



GDPR and Privacy Policy

CM Training recognises the importance of preserving the privacy of its trainees and clients, and the need to protect the security of personal information provided to CM Training in the conduct of its business. This privacy policy describes generally how we manage personal information and safeguard privacy.

The National Privacy Principles

CM Training is bound by the National Privacy Principles (NPPs) contained in the Privacy Act 1988 (Privacy Act). The NPPs establish minimum standards for the private sector in relation to the collection, handling, use, disclosure, management, access, correction and disposal of 'personal information' about natural persons. In summary, 'personal information' is information or an opinion relating to an individual which can be used to identify that individual.

Collection of Personal Information

The types of personal information we may collect and hold includes (but is not limited to):

- information provided to us when a trainee enrolls in a course CM Training procured or delivered course, including a student's name, age, address, occupation, education background, health details and contact details;
- information provided to us in the course of employment, including name, age, address, occupation, education background, health details and contact details;
- information about other people who come into contact with a member of the CM Training team.

We will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, telephone conversations and from third parties. We may also collect personal information from the use of our website. The only information we collect about people when they use our website is what a person chooses to tell us about themselves; for example, information provided in an email communication. However, please note that some of this information will



not be personal information because it will not necessarily reveal a person's identity.

Use and Disclosure of Personal Information

CM Training may use and disclose personal information for the primary purpose for which it was collected, for reasonably expected secondary purposes, and in other circumstances authorised by the Privacy Act. In general, we use and disclose personal information for the following purposes only:

- to conduct our business – that is, the provision of IT and business skills training;
- to communicate with a person; and
- to comply with our legal obligations.

We may disclose personal information to other members of the CM training team, to other companies or individuals who assist us in providing services or who perform functions on our behalf, courts, tribunals and regulatory authorities, and anyone else to whom a person authorises us to disclose it. We will take reasonable steps to ensure that anyone to whom we disclose personal information respects the confidentiality of the information and abides by the NPPs or equivalent privacy laws.

Government Disclosure Requirements

Personal information may be shared, as required by law, with relevant government authorities.. Personal information includes but is not limited to information concerning work, studies, ethnicity, gender, and living arrangements.

Access to Personal Information

Subject to the exceptions set out in the Privacy Act, a person can gain access to personal information that we hold about that person by emailing us. We will handle all requests for access to personal information in accordance with the NPPs. If for some reason we refuse to give access to such personal information, we will provide the person concerned with reasons for our refusal in accordance with the Privacy Act.

Management of Personal Information

In accordance with the Privacy Act, we take reasonable steps to protect the security of personal information held by us. This includes protecting



the information from misuse or loss and from unauthorised access, modification or disclosure, for example, by the use of physical security and restricted access to electronic records. Where we no longer require a person's personal information for a permitted purpose under the NPPs, we will take reasonable steps to destroy it.

CM Training endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. Generally, we will amend any personal information about a person held by us which is inaccurate, incomplete or out-of-date if the person requests us to do so. If we disagree with a person's view about the accuracy, completeness or currency of a record of personal information held by us, and the person asks us to associate with that record a statement that the person has a contrary view, we will take reasonable steps to do so.

Sensitive Information

Some personal information we collect is 'sensitive information'. Sensitive information includes personal information relating to a person's health, racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, or criminal record.

Sensitive information will be used or disclosed only for the primary purpose for which it was collected or a directly related secondary purpose, unless a person agrees otherwise, or where certain other limited circumstances apply (for example, where required by law).

GDPR

Introduction

The EU General Data Protection Regulation ('GDPR') came into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, GDPR has been designed to meet the requirements of the digital age.

GDPR imposes new obligations on organisations that control or process relevant personal data and introduces new rights and protections for EU data subjects.

Within this statement CourseMonster want to highlight to our customers the measures we have put in place to ensure compliance with GDPR where we process personal data on your behalf.



Our Commitment

CourseMonster places high importance on information security.

CM Training also ensures that the communication of Information Security, GDPR and other statutory requirements are covered through regular staff information security and data protection training and awareness campaigns.

CM Training is dedicated to safeguarding the personal information under our control and is committed to ensuring that we comply with GDPR to protect the personal information that we process, and to provide a compliant and consistent approach to information security and data protection while recognising our obligations within GDPR and the demands of the incoming UK Data Protection Bill.

GDPR Compliance

Our preparation and objectives for GDPR compliance have been summarised in this statement and includes the development of existing and implementation of new policies, procedures, controls and measures to ensure ongoing compliance.

Our internal Information Security and Data Protection staff have worked with external consultants and legal counsel to ensure that we meet the requirements of GDPR across our business.

CourseMonster will comply with GDPR as a processor and controller of data, depending on the area and engagement, and has been planning and developing a programme of works which deliver the requirements of the legislation. This has mandated working with our suppliers and partner organisations to ensure that they can also meet these obligations.

Our preparation includes:

- Data Audit - we understand the data, how any why we process it, retention, and where required, DPIA
- Lawful Basis for Processing - reviewed activities and confirmed the lawful basis
- Information Security - confirm our technical and organisational controls are appropriate
- Cookies and Privacy Notices- we have reviewed and updated our polices



- Data Subjects Rights - we have reviewed our processes to ensure that the data subject's rights are preserved including consent, subject access requests, right of erasure and correction
- Data Breaches - our incident management procedures have been enhanced to ensure we meet the reporting requirements
- Supplier Assessment - continue the process of supplier evaluation to confirm contractual and legal requirements are in place

If you have any questions surrounding CM Training GDPR compliance, please contact us via email at info@coursemonster.com