

Privacy Notice - Clients, Participants and Delegates (Processor) (Europe)

1. What is the purpose of this document?

Roffey Park is committed to protecting the privacy and security of personal information that it receives from clients, participants and/or delegates.

This privacy notice describes how we collect and use personal information about clients, participants and/or delegates.

Roffey Park Institute Ireland CLG is a "data processor". This means that we process personal information on the basis of instructions from the employers of clients, participants and/or delegates or directly from the client ("our Client").

This notice applies to current and previous clients, participants and/or delegates. We may update this notice at any time.

It is important that our Client ensures that clients, delegates and/or participants read this notice.

2. The kind of information we hold about clients, participants and/or delegates

Personal data, or personal information, means any information about an individual from which that person could be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

Depending on what services we have contracted to provide to our Client we may collect, store, and use the following personal information about clients, participants and/or delegates:

- Name.
- Date of birth.
- Personal contact details - address, email, telephone number and mobile number.
- Work contact details - address, email, telephone number and mobile number.
- Job title.
- CCTV footage and other information obtained through electronic means.
- Photographs and videos.
- Credit card details.
- Car registration.
- Passport details.

We will also collect, store and use the following "special categories" of more sensitive personal information about clients, participants and/or delegates:

- Information about any specific dietary requirements they or our Client tell us about.

3. How is your personal information collected?

We collect personal information about clients, participants and/or delegates through our contract with our Client. Much of the information we collect about our clients, participants and/or delegates will be provided by our Client whether this is you or provided by your employer.

4. How we will use information about clients, participants and/or delegates

We will only use personal information about clients, participants and/or delegates when the law allows us to. Most commonly, we will use personal information about clients, participants and/or delegates in the following circumstances:

- Where we need to perform the contract we have entered into with our Client.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and the clients, participants and/or delegates' interests and fundamental rights do not override those interests.

We may also use personal information about clients, participants and/or delegates in the following situations, which are likely to be rare:

- Where we need to protect the clients, participants and/or delegates interests (or someone else's interests).
- Where it is needed in the public interest.

5. Situations in which we will use personal information about clients, participants and/or delegates

We need some or all the categories of information in the list in paragraph 2 primarily to allow us to perform our contract with our Client, and to enable us to comply with legal obligations. In some cases, we may use personal information about clients, participants and/or delegates to pursue legitimate interests of our own or those of third parties, provided their interests **and** fundamental rights do not override our interests. The situations in which we may process personal information about clients, participants and/or delegates as follows:

- Managing our relationship with our Client (including to communicate with clients, participants and/or delegates, or our Client, provide services, and to create documentation produced during the relationship between us and our Client such as joining instructions, sign-in sheets, attendance sheets and name badges).
- To ensure that we keep up-to-date records about clients, participants and/or delegates e.g. contact details.
- For agreed marketing collateral.
- Administering the contract we have entered into with our Client (including accounting and auditing and any business continuity and disaster recovery planning).
- Storing a copy of a client contract.
- Participation in surveys.
- Participation in an audio recordings or transcripts.
- Event evaluation and feedback forms.
- Accommodation registration cards for onsite clients, participants or delegates.
- For onsite residential international clients, participants or delegates, passport details.
- Credit card details to process payment.
- Car registration for onsite security.
- Letters of attendance to enable a client or participant to obtain a visa to attend a programme.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of personal information about clients, participants and/or delegates.

6. If personal information about clients, participants and/or delegates is not provided

If our Client fails to provide certain personal information about clients, participants and/or delegates when requested, we may not be able to perform the contract we have entered into with our Client (such as providing services to our Client), or we may be prevented from complying with our legal obligations (such as to auditing of invoices).

7. Change of purpose

We will only use personal information about clients, participants and/or delegates for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information about clients, participants and/or delegates for an unrelated purpose, we will notify our Client and we will explain the legal basis which allows us to do so. Please note that we may process personal information about clients, participants and/or delegates without their knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information about clients, participants and/or delegates in the following circumstances:

- In limited circumstances, with their explicit written consent.
- Where we need to carry out our legal obligations or perform our contract with our Client and in line with our data protection policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect the interests of clients, participants and/or delegates (or someone else's interests) and they are not capable of giving their consent, or where they have already made the information public. We may also process such information about current and previous clients, participants and/or delegates in the course of legitimate business activities with the appropriate safeguards.

Our obligations as a company

We will use sensitive personal information relating to specific dietary requirements so that we can meet clients, participants and/or delegates needs if they are attending a programme or event at our residential site.

Do we need your consent?

Yes, we need explicit consent from clients, participants and/or delegates to process this sensitive personal information in these ways. Such consent will be sought from our Client and/or in our joining instructions.

9. Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about clients, participants and/or delegates using automated means, however we will notify our Client in writing if this position changes.

10. Data sharing

We may have to share data about clients, participants and/or delegates with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

If we do, clients, participants and/or delegates can expect a similar degree of protection in respect of their personal information.

Why might you share personal information about clients, participants and/or delegates with third parties?

We will share your personal information with third parties where required by law, where it is necessary to provide the services we have contracted with our Client to undertake or where we have another legitimate interest in doing so.

Which third-party service providers process personal information about clients, participants and/or delegates?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. Activities which may be carried out by the following third-party service providers: IT services.

How secure is information about clients, participants and/or delegates with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect personal information about clients, participants and/or delegates in line with our policies. We do not allow our third-party service providers to use personal information about clients, participants and/or delegates for their own purposes. We only permit them to process personal information about clients, participants and/or delegates for specified purposes and in accordance with our instructions.

We will share personal information about clients, participants and/or delegates with other entities in our group as part of our regular reporting activities on company performance, for system maintenance support and hosting of data.

11. International transfers

We may transfer your personal information to various jurisdictions to perform our obligations under this privacy notice and related agreements. The applicable data protection laws of those jurisdictions may differ from the data protection laws of your country and, in some cases, may not be as protective. Whenever we transfer your personal information outside your country of residence, we will ensure a similar degree of protection is afforded to it as the data protection laws of your country.

12. Data security

We have put in place measures to protect the security of personal information about clients, participants and/or delegates. Details of these measures are available upon request.

Third parties will only process personal information about clients, participants and/or delegates on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent personal information about clients, participants and/or delegates from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information about clients, participants and/or delegates to those employees, agents, freelancers and contractors and other third parties who have a business need to know. They will only process personal information about clients, participants and/or delegates on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify our Client and any applicable regulator of a suspected breach where we are legally required to do so.

13. How long will Roffey Park use personal information about clients, participants and/or delegates?

We will only retain personal information about clients, participants and/or delegates for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements or for the duration of our contract with you our Client. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of personal information about clients, participants and/or delegates, the purposes for which we process personal information about clients, participants and/or delegates and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise personal information about clients, participants and/or delegates so that it can no longer be associated with them, in which case we may use such information without further notice to them or our Client.

Once we consider a client, participant and/or delegate is no longer a client, participant or delegate we will retain and securely destroy their personal information in accordance with applicable laws and regulations. We retain participant and delegate names attending programmes and events for a period of 5 years in case of a request to verify attendance after which their personal information will be deleted.

14. Duty to inform us of changes

It is important that the personal information we hold about clients, participants and/or delegates is accurate and current. Our Client must keep us informed if personal information about clients, participants and/or delegates changes during your relationship with them.

15. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide our Client with a new privacy notice when we make any substantial updates. We may also notify our Client in other ways from time to time about the processing of personal information about clients, participants and/or delegates.

This notice may have been shared with clients, participants and/or delegates directly by us or via our Client's contact.

By participating in a service Roffey Park is providing, clients, participants and/or delegates acknowledge that they have received a copy of Roffey Park's Privacy Notice for Clients, Participants and Delegates (Processor) and have read and understood it.

If you have any questions about this privacy notice, please email dataprotection@roffeypark.com