

Privacy Policy

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Control Risks collects and processes your personal data through your use of our Site (as defined below), including any data you may provide through this website when you fill in the information about you on My profile or Self Registration page, or by corresponding with us by e-mail or otherwise. It includes information you provide when you register to use our Site, subscribe to our service, manage your preferences and alerts, enter the location of your assets, or conduct any research on the Site.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller/Processor

Control Risks Group Limited ("Control Risks") operates the website <https://client.controlrisks.com> ("CORE Site") and <https://www.trainingportal.no/mintra/p/controlrisks> ("eLearning Site", each the "Site") and organises its maintenance and the placing of its content. This privacy policy is issued on behalf of the Control Risks and references to "Control Risks", "we", "us" or "our" in this privacy policy, refers to Control Risks, its ultimate parent company, Control Risks International Limited, and may refer to one or more members of that group each of which is a separate legal entity. For a full list of such entities please contact CORE@controlrisks.com.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Where we make decisions about how personal data is handled, Control Risks is a controller. Where we process personal data that our clients' personnel input into our Sites and for which Control Risks does not make decisions about, Control Risks is a processor. We are a controller for the purposes of the CORE Site and we are a processor for the purposes of the eLearning Site.

In addition, the eLearning Site is developed and delivered by Mintra Training Portal Ltd ("Mintra"). We advise you to review Mintra's Privacy Policy at: <https://www.mintragroup.com/privacy-notice>.

Contact details

Our full details are:

Full name of legal entity: Control Risks Group Limited

Name or title of DPO: Sally McNair Scott

Email address: legal@ControlRisks.com

Postal address: Cottons Centre, Cottons Lane, London SE1 2QG

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

Any changes we make to our privacy policy in the future will be posted on this page and, where required, notified to you by e-mail. Please check back periodically to see any updates or changes to our privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our Site may, from time to time, contain links to and from other relevant websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

2. The data we collect about you

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- ▶ Identity Data includes first name, maiden name, last name, username or similar identifier, job title, location.
- ▶ Contact Data includes billing address, email address and telephone numbers.
- ▶ Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- ▶ Profile Data includes your username and password, your interests, preferences, feedback and survey responses.
- ▶ Usage Data includes information about how you use our website, services.
- ▶ Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We will collect and process the data in the following way:

Direct interactions. Information you give us. This is information about you that you give us by filling in the information about you on My profile or Self Registration page, or by corresponding with us by e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, manage your preferences and alerts, enter the location of your assets, or conduct any research on the Site, and when you report a problem with the Site. The information you give us may include your name, company details and address, job title/role, work e-mail address and work phone number.

Automated technologies or interactions. Information we collect about you. With regard to each of your visits to our site we will automatically collect the following information:

- ▶ technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- ▶ information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

Use of cookies (and technologies similar to cookies) on the Site

Google Analytics

Google Analytics collects first party cookies, as described above. The information collected using these cookies is sent to Google and is used to evaluate how the Site is being used. This enables Control Risks to compile statistical reports on how the Site is being used in order to help us deliver more meaningful content for visitors to the Site.

Control Risks does not collect (nor allow any third party to collect using the Site) personally identifiable information of visitors to the Site. We will not associate any data gathered with any personally identifying information. We will not link or seek to link any cookie information with any IP address or with the identity of a computer user. In short, our use of Google Analytics does not identify who you are, but it does track your movements on the Site.

A full list of cookies used by Google Analytics and explanations on how these work are available on Google's website

4. How we use your personal data

We will only use your personal data when the law allows us to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us at CORE@controlrisks.com.

Purposes for which we will use your personal data

We use information held about you for the following purposes:

Information you give to us. We will use this information:

- ▶ to provide you access to the Site and facilitate its use and to provide you with the information, products and services that you request from us;
- ▶ to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- ▶ to notify you about changes to the Site;
- ▶ to monitor quality and provide training ensure that content from the Site is presented in the most effective manner for you and for your computer.
- ▶ subject to your consent where required by applicable data protection laws to make suggestions and recommendations about services and events that may interest you.

Information we collect about you. We will use this information:

- ▶ to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- ▶ to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- ▶ to measure usage statistics;
- ▶ to provide training;
- ▶ as part of our efforts to keep our site safe and secure;
- ▶ to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- ▶ subject to your consent where required by applicable data protection laws, to make suggestions and recommendations about services and events that may interest you;
- ▶ where required by applicable data protection laws.

The Legal Basis for Processing your Personal Information

Sometimes Control Risks is required to have a lawful basis to process your personal data. The main grounds we rely upon are set out below:

- (a) Necessary for entering into, or performing, a contract – in order to perform obligations that we undertake in providing service(s) to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;
- (b) Necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
- (c) Necessary for the purposes of legitimate interests - either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our services and ensuring that our operations are conducted in an appropriate and efficient manner;
- (d) Consent – in some circumstances, we may ask for your consent to process your personal data in a particular way. To the extent that we are processing your personal information based on your consent, you will have the right to withdraw your consent at any time. You can do this by contacting us using the details in the Contact section below.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at: CORE@controlrisks.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data You agree that we have the right to share your personal information with:

- ▶ Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- ▶ Third parties that help us deliver the Sites or act on our behalf (our third-party service providers are not permitted to share or use personal information we make available to them for any purpose other than to provide services to us).
- ▶ The person providing for your access to our Services (e.g., your employer or our subscriber).
- ▶ Third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA) unless this is within the Control Risks Group or to third party service providers and we ensure a similar degree of protection is afforded to it by using agreements of which clauses have been approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Where we store your personal data

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. We will at all times comply with all applicable legislation, regulations, and other rules having equivalent force including legislation relating to personal data (the “Relevant Legislation”).

In relation to data protection, we will: (i) process such personal data in accordance with the terms of the Relevant Legislation; (ii) comply with the rights of the individuals to whom the provision of the services relate as set out in the Relevant Legislation; and (iii) transfer such personal data in accordance with the provisions of the Relevant Legislation.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access the Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Please be aware that the transmission of information via the internet is not completely secure. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data 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. However, you may always ask us to permanently erase your information and in certain circumstances you have a legal right to request such erasure. For eLearning, the person providing for your access to our services may set a different timeline.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including:

- ▶ Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- ▶ Request correction of your personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- ▶ Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- ▶ Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- ▶ Request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- ▶ Right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at CORE@controlrisks.com.

Content Standards

Access and use by you of the Site is subject to the terms and conditions agreed between Control Risks and the client (the “Terms and Conditions”). A copy of the Terms and Conditions is available on request from CORE@controlrisks.com. If you have been granted by a free trial, any use of the Site is subject to the terms of the disclaimer that has been sent to you by email.

By using the Site you agree to comply with the Terms and Conditions and, if you upload content to our site, you must comply with the following obligations (the “Content Standards”).

Instructions for how to upload content are available [here](#).

You must not:

1. upload any offensive or illegal content or any content subject to third party intellectual property rights or in respect of which a duty of confidentiality is owed to a third party;
2. misuse the Site or knowingly or through negligent or careless omission (including any deviation from good practice in information security standards) introduce to the Site or any content on the Site any virus, Trojan horse, worm, logic bomb or other malicious or harmful code or material;
3. carry out any penetration testing of the Site.