

CALL FOCUS PRIVACY STATEMENT

Introduction

This Privacy Statement relates to our privacy practices and policies in place for processing the data we collect from you, or that you provide to us. It sets out what personal data we collect and process about you in connection with the services and functions of Call Focus through our training programmes; where we obtain the data from; what we do with that data; how we comply with the data protection rules, who we transfer data to and how we deal with individuals' rights in relation to their personal data.

For the purpose of the Data Protection Acts, 1988, 2003 and 2018 (ROI) and Data Protection Act, 2018 (NI), hereafter referred to as the "Acts", the data controller is Call Focus (we/us/our). We are registered in Ireland and have our registered office at 91 Ballybawn Cottages, Enniskerry, Co. Wicklow, Ireland. Please contact us for more details at info@callfocus.ie.

Information we may collect from you and why?

Call Focus delivers mentoring, training and advisory services to a wide range of private companies and public sector organisations across many sectors and regions. Our programmes are customised to meet the specific needs of each organisation and industry sector.

Call Focus needs to collect and use data (information) to provide our training, mentoring and advisory services, to operate our business, to improve our offerings and to personalise your experiences. Therefore, we will ask you to provide certain personal data prior to providing our services – especially in the area of training. This includes:

- Attendee list - where you will share certain personal details about attendees background details – name of trainee, department/job role, age profile, length of time in role
- Training needs analysis (TNA) form - Attendees are be asked to complete a training needs analysis (TNA) form prior to training outlining their learning objectives, opinions and other comments.
- Attendee sheet and reaction to learning/ evaluation form - Upon completion of each days training, Call Focus asks trainees to sign the attendee sheet and complete a reaction to learning/ evaluation form.

The above details are invaluable to our continued efforts to provide tailored and relevant training programmes, to communicate with you, to enable us to enhance our training and operate our training effectively.

The purpose for collecting data

Call Focus takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. The purposes and reasons for processing your personal data are detailed below:

- To contact individuals and companies about various services they may have enquired about
- In the performance of a contract for providing mentoring, training and advisory services
- To customise our offerings and provide a high quality service which meets the needs of the organisation and individuals
- To contact attendees about various training programmes they have been registered to attend
- To share information with an employer having had staff attend a training / mentoring programme
- To contact individuals or organisations following completion of a training programme to evaluate the quality and impact of that training. This helps in the continuous development of our training courses, to assess the feedback and learnings of attendees and further develop our courses and services
- To enable Call Focus conduct risk assurance activities
- To share information with government departments and semi-state agencies for jointly run events where we are the data processor and obliged to do so– ie Skillnets, LEO's
- As part of our legal obligation for business accounting and tax purposes
- We may occasionally send you information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

Consent

In order to provide our services, we need to process data in line with this Privacy Statement. This includes the Attendee List, Training Needs Analysis (TNA) form and Reaction to Learning/ Evaluation Form. Therefore, you are giving us permission to process your personal data specifically for the purposes identified.

We need this data in order to provide our services. However, you may withdraw consent at any time by providing an unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify withdrawal of consent to the processing of personal data relating to you. If you have any queries relating to withdrawing your consent, please contact us info@callfocus.ie.

Withdrawal of consent shall be without effect to the lawfulness of processing based on consent before its withdrawal.

Our commitment to processing data

1. We process personal data fairly, lawfully and transparently. This obligation is inclusive of the fact that we have a valid legal basis for our processing of personal data (whether the consent of the person, or that the processing is necessary for our legitimate interests (as long as these interests do not outweigh the rights of data subjects) or some other legal basis set out under the Data Protection Act or (when applicable) the GDPR). We are transparent with individuals about our processing of their personal data.
2. We only collect personal data for specified, identified and legitimate purposes.
3. We only process the personal data that we have collected for the purposes which we have identified or for purposes that are compatible with the purposes that we have identified.
4. The personal data that we collect and process must be adequate, relevant and limited to what is necessary for the purposes.
5. The personal data that we collect and process must be accurate and (where necessary) kept up to-date.
6. We do not keep personal data any longer than is necessary, bearing the purpose for which we collected it. This includes that we keep personal data in a form, which permits identification of the data subject for no longer than is necessary.
7. We keep personal data safe and secure from unauthorised access, deletion, disclosure or other unauthorised uses. This includes not just keeping data safe and secure from persons outside our organisation, but also from people within our organisation who have no need to access or use the personal data. We are also careful when transferring personal data outside the European Economic Area ("EEA", being the EU plus Norway, Liechtenstein and Iceland), and make sure that we have a valid legal basis on which to transfer that data. Transfer can include using a cloud server that is located outside the EU or allowing people who are located outside the EEA access to personal data that is stored within the EEA.
8. We comply with data subjects' rights of information about, and (separately) access to, their personal data and with their other data protection rights, including rights to correct or erase their personal data, rights "to be forgotten", and (under the GDPR) rights to data portability.

Security of your personal data

We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself. We maintain data security by protecting the confidentiality, integrity and availability of the personal data.

How long will we keep your personal data?

Call Focus only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We will keep your details for a maximum of 6 years (unless previously agreed) after which time it will be destroyed.

Will we share your information with anyone else?

Your personal data may also be shared by us with when Call Focus is the "Processor" and has been contracted to carry out training or associated services on behalf of the "Controller".

Data in the form of a signed Attendee Sheet, a completed Reaction to Learning/ Evaluation Form may also be shared with employers where staff have given feedback as a result of training. Otherwise, we may pass your details to another agency but only if it is required by law, pursuant to our statutory functions, or if that agency is relevant to your enquiry. These agencies operate within the European Economic Union (EEA).

Your data protection rights

Under GDPR, You have several rights in relation to your personal data under applicable privacy and data protection law, which may be subject to certain limitations and restrictions. You have the right to find out what information we hold about you, and ask us not to use any of the information we collect. Individual rights include:

- The right to be informed of the personal data processing on your data
- The right of access or to receive a copy of your personal data
- The right to rectification of your data where it is incorrect or out of date
- The right to erasure of your data where there is no legal requirement to retain it
- The right to restrict processing of processing of data in certain scenarios, including when it is inaccurate
- The right to data portability a subset of your data to you or another provider
- The right to object to certain processing, such as marketing communications

Requesting your personal data

We will only process your personal information in compliance with their privacy notice and in according with the relevant data protection laws. If you have any questions about this policy or about our data protection compliance, please contact us at info@callfocus.ie

If you wish to wish to make a formal request for personal data we hold about you or to exercise your rights please contact us. If you wish to make a request for personal data you must make a formal request in writing as we will need proof of identification to verify your request.

We will respond to any valid requests within one month, unless it is particularly complicated or you have made repeated requests in which case we will respond, at the latest, within three months. We will inform you of any such extension within one month of receipt of your request, together with the reasons for the delay. You will not be charged a fee to exercise any of your rights unless your request is clearly unfounded, repetitive or excessive, in which case we will charge a reasonable fee in the circumstances or refuse to act on the request.

Your right to complain

In the event that you are dissatisfied with how CallFocus has fulfilled your data protection rights, please send full details of issue or complaint to info@callfocus.ie and we will endeavour to resolve the complaint as soon as possible. We require you to provide as much detail as possible about the issue along with a contact email address and telephone number in order to contact the user directly in the resolution of the complaint.

All complaints will be treated in the strictest confidence.

Should any user feel that their data protection rights have not been appropriately addressed, they have the right to complain to the Irish Data Protection Commission on:

- Data Protection Commission, Canal House, Station Road, Portarlington, Co. Laois, R32 AP23, Ireland
- info@dataprotection.ie

Further details on making a complaint to the Irish Data Protection Commission are available at: https://www.dataprotection.ie/documents/gdpr_forms/Raise_a_Concern_with_Us_Form.pdf

Changes to this Data Protection Notice

We reserve the right to change this Data Protection Notice from time to time at our sole discretion. If we make any changes, we will post those changes on our website and update the "Last Updated" date at the bottom of this Data Protection Notice. However, if we make material changes to this Data Protection Notice we will notify you by means of a prominent notice on the website prior to the change becoming effective. Please review the Data Protection Notice whenever you access or use this website.

This policy was last updated on 11th September 2018.