

PrivacyEngine Privacy Statement

Your privacy on the Internet is important to us. As the Internet offers the ability to collect certain types of information about users, we want you to understand the terms and conditions surrounding the capture, use and processing of any information we gather.

To that end, this privacy policy discloses what information we gather and how we use it. PrivacyEngine ("PE") is a Sytorus product (www.sytorus.com).

Sytorus complies with the requirements of the relevant European Data Protection legislation based on the jurisdiction of our main establishment in the Republic of Ireland, namely:

- The General Data Protection Regulation (2016/679)
- The Irish Data Protection Act (2018)
- The EC (Electronic Communications Regulation) Act 2011.

Personal Data Collected

Where personal data is provided by a PE user, the system collects the following pieces of personal information through the web site and the application:

- First name and surname of users
- Email addresses of users
- The company a user works with, and their Department or Business Unit
- Comments contained in interactive correspondence may contain personal information
- Company details which may include personal information of individuals, such as contact details of key staff
- Results of all training modules and exams completed
- Results of any questions answered
- Details on what policies users have viewed on completing training modules

Processing of Personal Data

Due to the nature of the services provided by PE, there is regular and active exchange of personal data between Sytorus and its Users. There are two different types of Users of PE, a Data Protection Officer ("DPO") user and a staff user.

PE processes personal information in the following ways:

- PE may email DPO users in providing the service, for example, in response to a question to a query posted
- PE will store information relating to queries until three months after that query is resolved to the satisfaction of the DPO
- PE will store information on use and completion of online training modules for as long as the company is a subscribed member.
- If the company ceases its subscription, the information will be anonymised and/or removed within one year of the termination of its subscription package
- PE processes credit card payments through a third party system. This process complies with the principles of the PCIDSS standard, and PE never stores credit card information at any time
- Information relating to queries and training modules will be aggregated, anonymised and analysed in order to improve the service provided. Sytorus may use aggregated information only in communications such as one-pagers, reports, briefing documents and publications
- Information relating to companies and individuals will never be distributed or shared with any third party except where required to complete the contractual service, for example, processing credit card payments, or where required to do so by law
- Personal Information gathered during the provision of these services will be stored in a secure manner on servers located within the European Economic Area (EEA)
- Updating and correcting users' personal information can be achieved directly through the PE interface

Access to Personal Data, and Individual Rights

- All individuals have the right to a copy of personal information we hold relating to them. This is achieved through a Subject Access Request (SAR)
- A SAR can be submitted by emailing hugh.jones@sytorus.com, indicating the scope of personal data required.
- In order to be valid, a SAR must be in writing (paper-based or e-mail will suffice) and the requestor may be required to provide adequate evidence of their identity, in order to avoid the inadvertent disclosure of another person's information
- We will respond to all SARs as quickly as possible, but in any event, within one month of receipt of the request
- Furthermore, Sytorus respects all of the rights of data subjects as articulated in the GDPR

Cookies

A cookie is a small, simple text file which is stored by your web browser (e.g. Google Chrome) on your computer or mobile device. Cookies allow us to tailor your web site experience for you. We may use a cookie file containing information that can identify the computer you are working from.

Sytorus uses Google Analytics and the analytics.js library to measure user interactions on the website. This JavaScript library uses a single cookie named `_ga` to store a unique client identifier (Client ID) which is a randomly generated number. Once the ID is generated it is stored in the cookie and is included with every hit / request sent to Google Analytics.

Visit <http://www.aboutcookies.org> for a guide on how to control and delete cookies on a wide range of web browsers and operating systems.

HotJar

This website uses the HotJar service to analyse the online behaviour and feedback of website users on a completely anonymous basis. Hotjar captures information such as mouse clicks, mouse movements, scrolling activity as well as non-personally identifiable information you type into online forms on the site (password fields and fields marked as “sensitive” are never recorded). We use this service to gather information that helps us to improve the user experience and the performance of this site. For more information see HotJar’s Privacy Policy at <https://www.hotjar.com/privacy>. You can choose to disable the HotJar service at <https://www.hotjar.com/opt-out>.

Changes to Policy

We reserve the right to change this policy at any time by notifying users of the existence of a revised policy. By continuing to use the Sytorus or PrivacyEngine Websites, you agree to be bound by the amended policy. We will inform you via a notice on the website when a policy is updated.

Please refer any questions in relation to this Policy, or to Sytorus’ processing of your personal data, to the Sytorus Chief Privacy Officer, hugh.jones@sytorus.com .