

PRIVACY POLICY

Policy Statement

This Privacy Policy ('Policy') sets out how CMC Partnership Global Ltd and CMC Partnership Consultancy Ltd ('we', 'us') use and protect any personal data that users ('you') provide, or that we collect from you in the course of our everyday business activities. Both organisations are committed to ensuring that your privacy is protected and appropriately managed.

We collect, use and disclose personal information (information by which an individual can be identified by) to perform our business activities and to provide customer services; primarily the provision of change management consultancy and training and the recruitment and selection of permanent staff, suppliers and products to deliver those services. Automated decision making or profiling is not carried out by either company.

By providing your personal information to us you agree that this Privacy Policy will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this policy.

This includes consent to us using and disclosing your personal sensitive information for the purpose for which it was collected, unless we subsequently receive your consent to use it for another purpose.

When you provide personal information in regard to a third party, e.g. providing emergency or referee details you agree that you have obtained the consent of the other person (third party) for us to collect, use and disclose their personal information in accordance with this Privacy Policy, and that you have made the other person aware of your actions and of this Privacy Policy.

If you do not agree with any part of this Privacy Policy you must not provide your personal information, or the personal information of others to us. Please note if you do not provide us with your personal information, or if you withdraw the original consent you provided under this policy, then this may affect our ability to provide services to you, or negatively impact the services we provide to you.

This policy may be updated from time to time. You should check this page from time to time to ensure you are happy with the changes we make.

This policy is effective from 21.11.2018.

An online version is available <http://www.cmcpartnership.com/privacy-policy>



Data Handling Practices as defined by this Privacy Policy

1. Personal data handling and the law

Personal information has the meaning given under your local data protection law. There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Privacy Policy. Where this occurs we will adjust our information handling practices in your jurisdiction to comply with these local data protection laws. This Privacy Policy outlines our information handling practices and managing your privacy in reference to the EU General Data Protection Regulations (GDPR) 25th May 2018.

We will only process your information where:

- You have given your consent to such processing by voluntarily providing us with your information, which you can withdraw at any time.
- The processing is necessary to provide our services to you.
- The processing is necessary for compliance with our legal obligations.
- The processing is necessary for our legitimate interests, or those of any third party recipients that receive your personal information

2. Information which we may collect from you

We typically process the following types of personal information:

- Contact name, email, address and phone number.
- Dietary requirements, special requests and /or health issues (if any) for those attending training events.
- Employment verification information, including criminal record checks.
- Learning and development records, including certifications.
- Information to support your employment with us and provision of benefits.

You may choose to share your personal data with us by making an online enquiry or purchase through our website/s, or by sending us an email, by completing a survey, or by providing your details by letter, by telephone, or by completing an internal form to support your employment or contractual status with the company. This may include subscribing to any of our services; requesting newsletters, obtaining downloads, registering for events and online webinars, contacting us through social media channels, accounting and administration (business to business) or applying for an opportunity in which you may be asked to provide your name, address, email and contact numbers, etc.

If you contact us we may keep a record of that correspondence and we may retain details of your visits to the website including, but not limited to, traffic data, location data, weblogs and other communication data and a record of the resources you access.



We may keep a record of your website preferences and interests, other information relevant to customer surveys, offers made by us and details of the transactions you complete through the website and the fulfilment of your orders.

3. Use of your information

We will use your personal information to contact you in response to your enquiry or application, or to support your continued employment/contractual arrangements with the company.

We will store your contact data so we can provide you with information in regard to other CMC products and services that you may be legitimately interested in. We may also contact you to ask you to complete surveys that we use for research purposes, although you do not have to respond to them. You have the option to unsubscribe from these communications at any time.

4. Location of your information

The data that we collect directly from you by email, hard copy, or through the use of our website www.cmcpartnership.com is stored in professional datacentres within the European Economic Area ('EEA').

Data collected through completion of web forms on www.cmcpartnership.sg is hosted and managed by our USA based sub-processor Hubspot.

Restricted Data Transfers from the EEA to the USA and vice versa

Minimal data transfer takes place but please be aware of the following:

- Your data may be transferred to a storage and processing destination outside the EEA if it appears from your records that you may be interested in our goods and services provided outside the EEA, e.g. training events in Asia. In this case your personal data (name, contact details and enquiry records) will be transferred and stored in a USA based datacentre managed by Hubspot who act as our contracted sub-processor for managing this service. Equally if you provide data to cmcpartnership.sg and you become interested in training and advisory events held outside Asia, your personal data may be transferred and shared with our UK based team and additionally hosted in the EEA.
- Your data will be transferred to and stored at a storage and processing destination outside the EEA if you have opted-in to receive our newsletters. In this case your contact email address will be transferred to MailChimp who act as our sub-processor using a USA based datacentre for managing this service.
- Your data (name and email address) will be shared with Prosci on your completed registration to attend a Prosci Change Management Training Event (see 5. Disclosure of your information). In this case your contact data will also be stored outside the EEA, within a USA based datacentre managed by Prosci.



- Employee and contractor personal data may be shared with third parties and transferred to their storage and sub-processing destinations to support customer delivery arrangements including business travel, etc.

Please be assured that these Sub-processors either hold Privacy Shield accreditation, or the company has contractual agreements in place which include EU data protection standard clauses. A list of sub processors used by us can be provided on [request](#).

5. Disclosure of your information

Where we have a legal basis to do we may disclose your personal information to:

- Prosci Inc. (when you register for Prosci® training) Please read their [Privacy Policy](#).
- Any member of our organisation, this includes employees of our global subsidiaries: CMC Partnership Asia pte and CMC Schweiz.
- Third party contractors and suppliers including but not restricted to benefit providers, travel providers, IT service and data hosting providers, parties supporting remote working on customer sites and external business advisors, such as lawyers, accountants and auditors.

In the event of sale, merger, de-merger or other reorganisation of the businesses, your personal data will be shared and processed in accordance with the legitimate interests of CMC and the relevant third parties. In all cases data sharing will only take place when appropriate contracts, including confidentiality and / or data transfer obligation (where required) are completed with the planned recipient/s of your data.

We will disclose your personal information if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of use, or to protect the rights, property, or safety of our companies, our customers, or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection and credit risk reduction, or to comply with UK Government regulations.

6. Controlling your personal information

We make every effort to maintain the accuracy and completeness of your personal information. However you can assist us by contacting us if there are changes to your personal information, or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from inaccurate, inauthentic, deficient, or incomplete personal information that you, or a person acting on your behalf provides to us.



If you believe that any information we are holding about you is incorrect or incomplete and require it to be amended, or if you would like a copy of the data we hold for you, or would like to request the removal of your information from our records, or require further information or would like to provide us with your feedback you may [contact us](#) at any time.

Please [email](#) or write to **CMC Partnership Data Protection** using the following address; **CMC Partnership (UK) Ltd, The Barn, Grace Dieu Court, Dingestow, Monmouth, NP25 4EB.**

You can at any time tell us not to send you marketing communications by [email](#), by using the contact information above, or by clicking on the unsubscribe link within the marketing emails you may receive from us.

ICO Registration

CMC Partnership Consultancy Ltd. is registered as a data controller with the ICO ZA469055
Nominated Data Protection Lead: Jane McIntosh.

CMC Partnership Global Ltd. is registered as a data controller with the ICO Z7927342.
Nominated Data Protection Lead: Daniel May

7. Security

We are committed to ensuring that your information is secure. We have reasonable security measures in place in order to protect your personal information from unauthorised access, use, alteration and disclosure.

Unfortunately the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk.

Once your information is received it is managed in line with recognised industry security good practice to safeguard it as best we can, but we cannot guarantee that the security measures we have in place will never be defeated or fail, or that such measures will always be sufficient or effective.

Please note:

- Your personal information will only be seen by those who have a legitimate reason for seeing it.
- Your data may be processed by staff operating outside the EEA who work for us, or for one of our suppliers.
- Our staff may be engaged in, amongst other things the downloading of your CV, fulfilment of your order and the provision of our services.
- By submitting your personal data you agree to this transfer, storing and processing.



- Third parties who are authorised to access, store and manage our data sets (which include your personal information records) are bound by confidentiality agreements.
- Our .com website is assessed as PCI compliant and validated by Trustwave.
- **We do not collect, access, store or process any payment information on our websites.** The processing of payment transactions is carried out in a third party secure Payment Gateway provided by Sage Pay Europe Limited.

8. Links to other websites and social media platforms

Our websites and other communications you receive from CMC Partnership may contain links to other websites of interest. If you use these links please be aware that we do not have any control over that other website and therefore we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites. Such sites are not governed by this privacy statement. Please exercise caution and look at the privacy statement applicable to the website in question.

Your interactions with Social Media platforms and us are governed by the privacy policy of the third party company providing them. CMC interacts with LinkedIn, YouTube, Vimeo and Twitter. Please refer to their privacy policies before you utilise their services.

9. IP addresses

When you access our website, use any of our mobile applications, or open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer and which are generally assigned when you access the internet. We may use IP addresses for system administration, investigation of security issues, and compiling data regarding use of our website, including the completion of web-forms and downloads, and / or mobile applications.

10. Cookies - what is a cookie?

A cookie is a small file which asks permission to be placed on your computer records. Most browsers are initially set up to accept HTTP cookies. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

11. How we use cookies

Cookies on the company's website www.cmcpartnership.com are used for a variety of different purposes, but generally speaking their use breaks down into the following categories:

Strictly Necessary Cookies:

These are required for the operation of the website. They include, for example, cookies that enable approved users to log into secure areas of the website.



Analytical/Performance Cookies:

We use Google Analytics to gain insight into how our website is used, analysing information on the most visited pages on our website, the geographical locations of our visitors, time spent on the website and the number of times a link has been clicked, amongst many other useful anonymous statistics. `_gat`, `_gid`, and `_ga` are enabled.

Functionality Cookies:

These improve the functional performance of our website and make it easier for you to use. For example, such cookies are used to remember that you have previously visited the website and asked to remain logged in to it if you have a user account.

Cookies are also used by www.cmcpartnership.com to protect the security of the site, for example by blocking multiple form submissions.

In order to give the best possible browsing experience, we use session cookies to temporarily store data. Session cookies are used to keep track of your activity as you move from page to page through the website. Our session cookies do not collect any personal/traceable data about you and are automatically deleted when you close your browser

Targeting Cookies:

- These record your visits to our website www.cmcpartnership.sg, identifying the webpages you have visited and the links you have followed.
- Targeting cookies are not enabled on www.cmcpartnership.com.

12. Removing & Managing Cookies

To ensure that you are in control of your privacy at all times, all web browsers give you the option to disable cookies. Most browsers are initially set up to accept HTTP cookies.

For more information about HTTP cookies and how to disable them the following links may be helpful, or you can use the “Help” option in your browser which should tell you how to stop accepting new cookies.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#)

Useful Links

If you would like to find out more about privacy, cookies and their use on the internet, you may find the following links useful:

- [Microsoft cookies guide](#)
- [All About Cookies](#)
- [The Information Commissioner's Office](#)

