

This Privacy Notice sets out the basis on which the Company will process any personal data collected or received from our business customers utilising the Training Centre. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Data Protection Officer: Our Senior Legal Advisor will assume the responsibilities of the Data Protection Officer. All correspondence should be addressed to DPO@sparrowsgroup.com

Scope: This Privacy Notice applies to Sparrows Offshore Group Limited ("Sparrows Group") ("The Company") and all subsidiary companies.

1 WHAT INFORMATION DO WE COLLECT?

The Company collects and processes a range of information about you which includes:

- **For Client Sponsored bookings:** the name and business contact details, including company address, job title, date of birth, email address and telephone number of the booker and contact details, including company address, job title, date of birth, email address and telephone number for the training course attendee.
- **For Self Sponsor bookings:** your contact details, including home address, date of birth, job title, email address and telephone number.
- Information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments;

Data is stored in a range of different places, including the Company's training database, marketing/ mailing lists, payment systems and the Sparrows Group and Training Booking email systems.

2 WHY DOES THE COMPANY PROCESS PERSONAL DATA?

Sparrows Group need to process data for the following purposes:

- To provide Training Services
- Conclude, perform and manage new and existing training enquiries and bookings
- Health and safety
- Legal and/or regulatory compliance

3 WHO HAS ACCESS TO DATA?

Your information will be shared internally with Sparrows Staff, if access to the data is necessary for performance of their roles and, where necessary, competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which Sparrows Group is subject to. In all circumstances the data will be subject to confidentiality arrangements.

We also share your data with third parties that process data on our behalf, in connection with training, the facilitation of payment, and audit purposes. These third parties include:

• accessplanit	• OPITO
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4 HOW DOES THE COMPANY PROTECT DATA?

The Company has implemented a number of operational controls and internal policies to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Data may be transferred outside of the European Economic Area to companies within the Sparrows Group, protected by appropriate transfer safeguards, which guarantee an adequate level of data protection wherever your data is physically kept.

Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions, ensuring the third party has implemented appropriate technical and organisational measures to ensure the security of data.

5 FOR HOW LONG DOES THE COMPANY KEEP DATA?

The Company will hold your data for the duration of the training course. The period for which your data is held after the training course will be determined by a retention policy set by the Company or as governed by legislation.

6 YOUR RIGHTS

As a data subject, you have a number of rights, you can:

- Access and obtain a copy of your data on request;
- Require The Company to change incorrect or incomplete data;
- Require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where The Company is relying on its legitimate interests as the legal ground for processing; and
- Ask The Company stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override The Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact our Data Protection Officer. All correspondence should be addressed to DPO@sparrowsgroup.com

If you believe that The Company has not complied with your data protection rights, you can complain to the Information Commissioner.

7 CHANGES TO PRIVACY NOTICE

We keep our Privacy Notice under regular review and, as such, it may change from time to time. This Privacy Notice was last updated on 24th January 2019.