

## **CORRODERE PRIVACY NOTICE**

This privacy notice is provided by Corrodere Limited whose registered office is at Peel House, Upper South View, Farnham, Surrey, GU9 7JN (**'we'**, **'our'** or **'us'**).

Please read this privacy notice carefully as it contains important information on how and why we collect, store, use and share any information relating to you (your **'personal data'**) in connection with your use of our website and our services. It also explains your rights in relation to your personal data and how to contact us or the Information Commissioner's Office in the event you have a complaint.

In this privacy notice, references to 'Controller', 'process' and 'processing' mean the same as the definitions specified in Article 4 of the UK GDPR.

### **About us and our responsibility for your personal data**

As part of our role in delivering globally accredited training in corrosion and coating for the global coatings industry, we collect, use and are responsible for certain personal data about you. When we do so, we are subject to the UK General Data Protection Regulation (**'UK GDPR'**). We are also subject to the EU General Data Protection Regulation ('EU GDPR') in relation to goods and services we offer to individuals in the European Economic Area ('EEA') and to any applicable national data protection laws in countries outside of the EEA. This privacy notice relates to our obligations under UK and EU GDPR.

Where we are a Controller of your personal data, we are the organisation legally responsible for deciding how and for what purposes it is used. We are registered as a Data Controller with the Information Commissioner's Office under registration number **ZA900753**.

We may not always be the Data Controller of your Personal Data. Where this is the case, we ensure that we comply with the instructions of the Data Controller and process your personal data in accordance with applicable laws and regulations.

### **Personal data that we collect about you.**

We may collect and use the following personal data about you, where applicable:

- your name, address and contact information, including email address, telephone number and company details;
- information to check and verify your identity including your eligibility to register and enrol on a course, e.g. date of birth or previous qualifications;
- your gender or preferred pronouns;
- details of your employer and job role;
- your account details, such as username and login details or any reference number or student/membership number assigned to you;
- details of any feedback or other information that you give to us, including via phone, email, post, social media or via our apps;
- your activities on, and use of, our website, including information about how you use our website and technology systems;
- photos which have been taken by us or on our behalf in which your image or other information which identifies you may feature;
- bank details, billing information, transaction and payment card or other payment method information (where applicable) when paying for our training courses or any other services we provide or administer for others.

For you to register as a Student with us, you will be required to provide certain personal data.

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case, we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on you.

We may obtain your personal data from:

- our website [www.corrodere.com](http://www.corrodere.com), including:
  - Corrodere Academy – the student portal through which registered members, (**'Students'**), interact with our training courses via the following websites:
    - [applicator.corrodere.com](http://applicator.corrodere.com),
    - [inspector.corrodere.com](http://inspector.corrodere.com); and
    - [specialist.corrodere.com](http://specialist.corrodere.com);
- a third party in connection with your participation in our training programme, including:
  - your employer or any party who is sponsoring or funding your training with us;
  - previous training providers or accreditation bodies to provide us with any required details of your prior qualifications or training;
  - our sales agents;
- any of our social media pages;
- our TTP Log Book app and Practical Results app (our **'Apps'**);
- when you contact us, either directly or via our third-party service providers (including via email, phone, post, social media or via our website or Apps), send us feedback and complete customer surveys;
- when you express interest in our services, either directly or via third party providers to whom you have given your consent, including registering for exhibitions or conferences which we are involved with; and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly from your device (e.g. your phone, laptop, tablet or any internet connected technology you use to view any part of our website) using the technologies explained in the section on **'Cookies and other tracking technologies'** below.

### How and why we use your Personal data

We may process your personal data for the following reasons:

- hosting, operating and maintaining the Corrodere Academy to offer training courses to students;
- registering, verifying or maintaining your registration at Corrodere Academy and your participation in our programme;
- issuing and renewing training certificates or CSCS cards;
- when you contact us with a query, complaint, request or for any other reason;
- when we are required to process the data provided to us by any other third party, including any publicly available registers or any data sources that we are required to obtain information from in order to verify your identity, address or contact information;
- sharing with any third party to whom we are required to share data for the purposes of fulfilling a contractual, legal or regulatory obligation to you or to them; and
- processing your personal data for our legitimate interests.

### Marketing

We may also use your personal data to send you updates or marketing material about our training courses (by email, text message, app notifications, telephone or post).

You have the right to opt out of receiving marketing communications at any time by contacting us (see the **'How to Contact Us'** section below); or using the **'unsubscribe link'** in emails or your app notification settings.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products or services in the future, or if there are changes in the law, regulation, or structure of our business.

We will never sell or share your personal data with other organisations for marketing purposes (beyond those involved in providing your training and related services).

### Our legal basis for processing your personal data

Under data protection law, we can only use your personal data if we have a legal reason to do so. The table below explains our legal grounds for processing your personal data.

A *legitimate interest* is when it is necessary for us to use your personal data for a business or commercial reason, so long as this does not override your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

What we use your personal data for	Our legal reasons
Creating and managing your account with us	To perform our contract with you or to take steps at your request before entering into a contract
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	As necessary to comply with our legal, regulatory and contractual obligations
Enforcing legal rights or defend or undertake legal proceedings	As necessary to comply with our legal and regulatory obligations, or for our legitimate interests, i.e. to protect our business, interests and rights.
Customising our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website	<ul style="list-style-type: none"> <li>• where your consent is gathered by the cookies on our website, see the section on ‘Cookies’ below.</li> <li>• where we are not required to obtain your consent and it is required for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you.</li> </ul>
Protecting the security of systems and data used to provide the services	As necessary to comply with our legal and regulatory obligations and to ensure the security of systems and data. Where we do this to a standard that goes beyond our legal obligations, our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.
Statistical analysis to help us understand our customer base	As necessary for our legitimate interests, i.e. to be as efficient as we can, to deliver the best service to you and to find ways of improving our data and services that would provide a benefit to our consumers.
Undertaking service improvements and developing new services to improve our offering.	As necessary for our legitimate interests, i.e. to be as efficient as we can, to deliver the best service to you and to find ways of improving our services that would provide a benefit to our consumers.
Marketing our services	For our legitimate interests, i.e. to promote our business. See ‘Marketing’ section above for further information.
The audit of our quality management system and financial records by externally accredited and trained auditors	For our legitimate interests, so as to maintain our accreditations and to maintain a high standard of training service provision.

To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary

Depending on the circumstances:

- to comply with our legal and regulatory obligations
- in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets

### Who we share your Personal data with

We routinely share personal data with:

- companies providing training to students, or trainers that a student is assigned to;
- trainers other than that which the student is assigned to, if the student so requests or consents;
- third parties we use to help deliver our products and services to you, e.g. payment service providers and identity verification database providers;
- other third parties we use to help us run our business, e.g., marketing agencies, CRM providers, website hosts and website analytics providers;
- auditors appointed by us or any party for whom we perform a contractual service; and
- other third parties engaged by us whom we are satisfied take appropriate measures to protect your Personal data and upon whom we impose contractual obligations to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations and any sharing will be necessary for the purpose of completing the audit;
- professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations; and
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.

### Transferring your Personal data outside of the UK and EEA

Some cloud services that we use may operate outside of the UK and EEA and we also work with companies, agents and trainers worldwide. Therefore, it may sometimes be necessary for us to transfer your personal data to countries outside the UK and EEA, whose laws may provide lower levels of data protection. In those cases, we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data and transfer your personal data only under the following legal mechanisms:

- in the case of transfers subject to UK data protection law, the UK government maintains a list of countries which ensure an adequate level of protection of personal data (known as an ‘**adequacy regulation**’). These are listed [on the ICO website](#). We rely on adequacy regulations for transfers to those countries and, in relation to transfers to the United States of America, only to commercial organisations who participate in the EU-US Data Privacy Framework;
- in the case of transfers subject to EEA data protection laws, the European Commission maintains a list of particular countries which ensure an adequate level of protection of personal data (known as an ‘**adequacy decision**’) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#);
- under approved standard data protection clauses, or
- where a specific exception applies under relevant data protection law.

## How long your Personal data will be kept

We will not keep your Personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data. For example, we keep information on prospective customers long enough to make our sales enquiry system effective. If you subscribed to a newsletter or updates list, you will remain on the list(s) you joined until you unsubscribe from that list. We keep records of students who have undertaken our training courses indefinitely for the purpose of verification and renewals. We retain backups of our data, which includes personal data, for a period of seven years from when it was last modified.

## Links to third parties

Throughout our website, we may link to other websites or platforms owned and operated by third parties, for the purposes of providing our services. Those third parties may also gather and process information about you when you use their website and platforms. They do so in accordance with their own privacy policies or notices, which you should make yourself aware of by looking on their website or contacting them directly.

## Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions and to understand and improve the way in which you use our website.

For further information on cookies, our use of them, when we will request your consent before placing them and how to disable them, please see our [Cookie Policy](#).

## Your rights

According to applicable data protection law, you have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data, known as a data subject access request
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: —at any time to your personal data being used for direct marketing —in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests (unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims).
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. However, we do not make any such decisions.

The right to withdraw consents	If you have provided us with consent to use your personal data you have a right to withdraw that consent easily at any time. You may withdraw consent by contacting us as set out below. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.
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For further information on each of those rights, you may find it helpful to refer to the [guidance from the UK's Information Commissioner](#) on your rights under the UK GDPR.

### Keeping your Personal data secure

We have put in place appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint, at:

Corrodere Limited,  
Peel House,  
Upper South View,  
Farnham,  
Surrey, GU9 7JN

Telephone number: 01252 732 236

Email: [info@corrodere.com](mailto:info@corrodere.com)

When contacting us please:

- provide enough information to identify yourself (*e.g. your full name, address and username*) and any additional identity information we may reasonably request from you, and
- where relevant, let us know which right(s) you want to exercise and the information to which your request relates.

### How to complain

Please contact us if you have any queries or concerns about our use of your personal data using the contact details given below. We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner in the UK and/or with the applicable regulator in the territory in which you reside. The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113 and they can provide the details for the regulator in your country of residence, if required.

### Changes to this notice

We may change this privacy notice from time to time. When we make significant changes, we will inform you, for example when you visit our website, when you log in through the student portal on Corrodere Academy, via our Apps, or via email.

**Policy updated:** 01<sup>st</sup> January 2025