



CARONI RIVER
GROUP

DATA PROTECTION POLICY AND PRIVACY POLICY



Website Data Protection Policy and Privacy Policy

www.caroniriver.com ("our website") is a Site owned and operated by Caroni River Group UK LLP ("Caroni River Group"). We are a limited liability partnership, registered in England and Wales with partnership number OC432235, whose registered office is at Crown House, 27 Old Gloucester Street, London, WC1N 3AX, trading as Caroni River Group ("we", "us", "our").

This is the Website Data Protection and Privacy Policy ("Policy") for Caroni River Group. Our data processing activities are governed by the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"). For the purpose of the GDPR, we are the 'Data Controller' of all Personal Data obtained by us as set out in this Policy, because we ultimately determine how your Personal Data will be handled by us or our service providers and contractors, who would be our 'Data Processors'. If we handle your Personal Data then you are a "Data Subject", which means you have certain rights under the GDPR in relation to how your Personal Data is processed, which are set out in this notice.

At Caroni River Group, we respect your privacy and this Policy, together with our [Website Terms of Use](#) which can be found here and our [Cookies Policy](#) which can be found here, governs how Caroni River Group collects, processes and uses your Personal Data (as defined below) when you use our website (as defined below). For the purposes of certain data protection and privacy laws Caroni River Group acts as a controller in respect of your Personal Data.

Caroni River Group and each Partner that provides courses through our website care about the confidentiality and security of your information. This Privacy Policy applies to information that we collect through our website when you interact with Caroni River Group, with any of our Partners, with other users, and generally with our website.

Your information is received and controlled by Caroni River Group according to this Policy when you sign up for a user account or otherwise use our website. Caroni River Group is solely and independently responsible for its own privacy practices, and we do not accept liability in relation to any Partner's privacy practices.

If you do not accept the terms of this Privacy Policy, then please do not access, browse, or register for our website or enroll in any courses. If you choose not to provide certain information required to provide you with various products and services offered on our website, then you may not be able to establish a user account or obtain those products or services.

Any version of this Privacy Policy in a language other than English is provided for convenience and you understand and agree that the English language version will prevail if there is any conflict.

This Policy was last updated August 2020 and may change from time to time and you should



review it periodically.

To contact us, please email getsupport@caroniriver.com

BY USING OUR WEBSITE, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY

DEFINITIONS

The following definitions shall apply to this Policy:

Partner is each individual, educational institution, registered company or other institution or entity that provides services, courses or programs through our website.

Personal Data is information that relates to an identified or identifiable person who could be identified, directly or indirectly based on the information, which is in the possession of, or is likely to come into the possession of, Caroni River Group and any other legal definition of what counts as Personal Data in the UK.

Verified Certificate is a virtual certificate that verifies that a learner has successfully completed a specific course or program. This certificated is printed with the learner full name, a unique traceable code, number of training hours and details of the course or program. The learner identity may be required to be verified by using a webcam and acceptable form of photo ID.

Website consists of all content and pages located within the www.caroniriver.com web domain and all mobile applications owned by us that link to this Policy.

TYPES OF PERSONAL DATA WE COLLECT IN RELATION TO YOU

Caroni River Group may collect and process standard internet log information and details of visitor behavior patterns, specifically the following categories of Personal Data about you from the sources identified as follows:

- **Website Data.** We may collect and process Personal Data about you when you browse our website. Website Data may include information submitted as part of completing online forms on our website including, but not limited to:
 - i. Your name.
 - ii. Your age.
 - iii. Your date of birth.
 - iv. Your citizenship.
 - v. Your e-mail address and contact information.
 - vi. Your internet protocol address or other online identifiers.
 - vii. Location data.
 - viii. Genetic identity factors.



- ix. Pseudonymous data.
- x. Technical information collected by cookies (see below) about the services and products that you use and how you use them.
- Identity Verification Information. To help us respond to requests for data access and/or deletion requests as required by applicable laws, as well as create and maintain a trusted environment, we may collect identity verification information from you, such as images of your government issued ID, passport, national ID card, or driving license, as permitted by applicable laws, or other authentication information.
- Communications Data. We may collect Personal Data that you provide when you contact us for any reason, such as to express an interest in obtaining additional information about our services, direct questions or concerns about our services to us, use a "Contact Us" online form or similar features, sign up for our newsletters, emails or attend an event, or download certain content. Such information may include contact information such as name, job title, company name, phone number, and email address.
- Reputation Data. We may collect Personal Data from you and from third parties in connection with performing diligence on our service providers and Partners. This data may include contact details, information concerning business practices, creditworthiness, reputation and business history, and job titles or roles.

Please note that if you do not provide certain Personal Data to us when requested (and where relevant, provide your consent) we may not be able to provide you with access to all areas of our website and associated services.

Please refer to our [Cookie Policy](#), which can be found here, which forms part of this Policy.

Your browser and other mechanisms may permit you to send do-not-track signals or other similar signals via your browser settings to express your preferences regarding online tracking. Due to the lack of any standard for how do-not-track should work on commercial websites, we do not currently respond to such signals. Third parties, such as our analytics providers, from time to time may collect Personal Data that relates to you on our website, over other websites. We cannot control third parties' responses to do-not-track signals or other such mechanisms. Third parties' use of Personal Data relating to you and responsiveness to do-not-track signals is governed by their respective privacy policies.

HOW WE USE YOUR PERSONAL DATA

Caroni River Group may collect, store, disclose and process information, including your Personal Data for the following purposes:

- to analyze and improve our services;
- for the management and administration of our business;
- for ongoing review and improvement of the information, content and services provided



on our website to ensure they are user friendly and to prevent any potential disruptions such as cyber-attacks;

- to enroll you in the courses and programs published on our website, to learn effectively in such courses and programs, and to purchase or obtain products and services on our website such as Verified Certificates, tutor support, technical papers, scientific and academic journal articles.
- to improve the delivery of online courses and programs on our website. This also includes personalizing courses, so your learning experience is tailored to your interests and needs, and assessing your performance and awarding certificates.
- to provide you with marketing communications and inform you about news and information relating to our products and services, including new courses and programs, product updates and general business news;
- to assess your application for Caroni River Group's products and services, where applicable;
- to understand your needs and interests and to respond to your enquiries;
- to provide you with the products and services for which you subscribe;
- to comply with and in order to assess compliance with applicable laws, rules and regulations (including tax reporting purposes pursuant to tax legislation), industry codes, voluntary codes we decide to adopt, or good practice, anywhere in the world and internal policies and procedures including the [Website Terms of Use](#);
- to confirm and verify your identity and to conduct due diligence, background and related checks;
- to analyze and report on our website traffic, marketing and usage trends;
- to allow you to use and access functionality provided by our website;
- to conduct analysis required to detect malicious data and understand how this may affect your IT system;
- for statistical monitoring and analysis of current attacks on devices and systems for the on-going adaption of the solutions provided to secure systems and devices against current attacks;
- to detect, investigate and prevent fraud and other crimes or malpractice.
- for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings);
- to obtain legal advice or to establish, exercise or defend legal rights;
- the administration and maintenance of databases storing Personal Data;
- to comply with our contractual obligations;
- for in-depth threat analysis; and
- for purposes otherwise set out in this Policy.

We are entitled to use your Personal Data for these purposes because of the following legal bases:



- **Performance of contract:** we might need to do so if we are in a contract with you or we are about to enter into a contract with you in order to perform our contractual obligations to you, for example, we might need to use your email address to communicate with you, which would count as processing your Personal Data.
- **Consent:** Caroni River Group has obtained your specific and informed consent (which may include written consent) unless an exemption provided under applicable law permits the use and disclosure of your Personal Data without your consent;
- **Compliance with a legal obligation:** we might need to process your Personal Data in order to comply with a common law or statutory obligation, such as disclosures for compliance with Her Majesty's Revenue and Customs ("HMRC") requirements, requirements relating to money laundering or other such disclosures Caroni River Group has legal or regulatory obligations that must be discharged, or may need to do so in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings.
- **Legitimate interest:** the use of your Personal Data is necessary for our legitimate business interests or the legitimate interests of a third party, including:
 - i. Allowing us to effectively and efficiently administer and manage our business;
 - ii. maintaining compliance with our internal policies and procedures;
 - iii. monitoring the use of our copyrighted materials;
 - iv. offering optimal, up-to-date security solutions for mobile devices and IT systems;
 - or
 - v. for internal research purposes.

If you are located in a jurisdiction which requires us to obtain your consent to collect, use, store, process and disclose your Personal Data, you understand that by accepting the terms of this Policy you expressly provide your consent to us collecting, using, storing, processing and disclosing your Personal Data as set out in this Policy.

DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES

Caroni River Group does not sell Personal Data to third parties; however, we may share or provide access to your Personal Data with our Partners and third party agents, service providers and contractors outside of Caroni River Group:

- for the purpose of the management and administration of our business;
- in order to facilitate the provision and improvement of services to you;
- for the purpose of the administration and maintenance of the databases storing Personal Data;
- to the extent required by law obligation, rule, regulations or our internal policies and procedures, including (without limitation) in order to comply with tax reporting requirements and other statutory reporting and disclosures to regulatory authorities), or to establish, exercise or defend its legal rights. This may include disclosure to



regulatory bodies or government agencies and in order to investigate unauthorized attempts to modify our website, install harmful files or cause damage to our business);

- if Caroni River Group is acquired by a third party, including in the unlikely event of a bankruptcy, in which case the Personal Data held by us about you will be accessible to, and may be acquired by, the third party buyer.

Caroni River Group may share anonymous or aggregated data with third parties such as service providers in order to facilitate our business operations.

LINKS TO OTHER WEBSITES

Our website may contain links to other party websites that are not governed by this Policy. Linked sites may have their own privacy notices or policies, which you should review. We are not responsible for the content of links or third party websites and your use of such third party websites is at your own risk.

TRANSFERS OF PERSONAL DATA

Caroni River Group operates globally, therefore we may also transfer your Personal Data to countries outside of the European Economic Area (“EEA”) to other people or companies for one of the legal bases for processing your Personal Data as indicated above. Accordingly, when you provide your Personal Data to us, you acknowledge and agree that we may disclose your Personal Data to recipients (including, but not limited to our Partners, third party agents, service providers, contractors and IT servers) located in jurisdictions other than your own.

Where we transfer your Personal Data, we will put in place safeguards in accordance with applicable law (including Articles 44 to 50 of the GDPR). These safeguards may include taking steps to check that for any country or international organization to which your Personal Data will be transferred offers an adequate level of protection to protect your Personal Data, as well as (if applicable) the use of standard contractual clauses in any contract with that third party for steps to be taken to keep your Personal Data secure.

To the extent that applicable data protection and privacy law do not allow or permit us to obtain your valid consent by virtue of providing this Policy to you, or otherwise rely on the other grounds set out in this Policy for disclosing your Personal Data outside of your jurisdiction under the data protection and privacy law of your jurisdiction, we will obtain your explicit consent through other means (if applicable) or, where relevant, ensure that the recipient is bound by data protection and privacy laws of its jurisdiction to provide a standard of protection to your Personal Data that is equivalent to that under the data protection and privacy laws of your jurisdiction.



In other circumstances, data protection and privacy laws may permit Caroni River Group to otherwise transfer your Personal Data outside your jurisdiction provided it is in compliance with such data protection and privacy laws.

HOW WE SAFEGUARD YOUR PERSONAL DATA

While we do our best to protect your Personal Data, we cannot guarantee the security of any information that you transmit to us and you are solely responsible for maintaining the secrecy of any passwords, enrolment keys or other account information.

We have implemented commercially reasonable controls and appropriate technical and organizational measures to protect Personal Data, as well as to maintain the security of our information and information systems in respect of Personal Data. Reasonable measures are taken to ensure physical access to Personal Data is limited to authorized employees.

Our employees are required to follow applicable laws and regulations, including in relation to data protection and privacy laws. Unauthorized use or disclosure of Personal Data and any confidential information by a Caroni River Group employee is prohibited and may result in disciplinary measures.

RETENTION AND DESTRUCTION OF PERSONAL DATA

Caroni River Group will retain your Personal Data for as long as your account is active, or for the length of the contract with you and for approximately 15 years afterward to deal with any post-contract issues, or as needed to provide you with services; to maintain a record of your transactions for financial reporting, audit, and compliance purposes; and to comply with our legal obligations, resolve disputes, enforce its agreements, and as otherwise permitted by applicable laws or regulations.

Depending on the requirements of the data protection law of your jurisdiction, Caroni River Group will take reasonable steps using appropriate technical methods in the circumstances to delete or destroy your Personal Data when we no longer have a legal basis to retain it or to ensure that the information is anonymized or irrecoverable.

YOUR RIGHTS AS A DATA SUBJECT

To the extent provided by the law of your jurisdiction, you may have legal rights in relation to your Personal Data. These rights may include:

- the right to be informed on for what purpose we are processing your Personal Data and what Personal Data we are processing.
- the right of access to the Personal Data about you and to be provided with copies of the Personal Data of you that we are processing as well as confirmation of the



processing we are doing. You can do this by sending a "subject access request" to the contact details noted above for our consideration.

- the right to refuse to provide any Personal Data and the right to object at any time to the processing of your Personal Data. Please note that such refusal or objection may prevent us from providing services to you.
- the right to request a rectification of the Personal Data that we hold on you if you think the Personal Data is inaccurate or incomplete, you can tell us and we will fix it for you.
- the right to request that Caroni River Group permanently delete the Personal Data we hold for you then you can ask us to do so. Please note that such a request may prevent us from providing services to you and there may be circumstances where we are legally entitled to retain Personal Data regardless of any such request.
- the right to withdraw your consent to the collection, processing, use and/or disclosure of your Personal Data (where your consent was provided for certain processing activities) at any time by contacting us. Please note, however, that this will not affect the lawfulness of any collection, processing, use or disclosure undertaken before your withdrawal and that we may still be entitled to process your Personal Data if it has another legitimate reason (other than consent) or a consent exception for doing so.
- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that Caroni River Group transmit that data to a third party where this is technically feasible. Please note that this right only applies to Personal Data that you have provided to Caroni River Group.
- in some circumstances, the right to request that Caroni River Group restrict or block its processing of your Personal Data. Please note that such a request may prevent us from providing services to you and there may be circumstances where we are legally entitled to retain Personal Data regardless of any such request.
- where applicable, the right to lodge a complaint with the data protection regulator in your jurisdiction if you think that any of your rights have been infringed by Caroni River Group.

You can enquire about your rights, which are applicable to you, or if you wish to exercise any of the rights, which are applicable to you, please contact us in the email address getsupport@caroniriver.com. You can also find out more information about your rights as Data Subject according to GDPR in <https://gdpr-info.eu/chapter-3/>.

CHILDREN

Our website is not structured to necessarily attract children and therefore, we do not knowingly intend to collect Personal Data from anyone we know to be under 18 years of age.

PROCESSING OF PERSONAL DATA FOR MARKETING PURPOSES



To the extent permitted by applicable law, we may contact you by mail, e-mail, SMS/text, telephone and other electronic means to provide information on products and services that we believe will be of interest, unless you object to receiving such information. If you do not want to receive such communications from us, please contact us on the details set out below or by using the opt-out facilities provided within the relevant marketing material.

Your option not to receive promotional and marketing material:

- i. shall not preclude us from corresponding with you, by email or otherwise, regarding your relationship with us (e.g., your account status and activity or our responses to questions or inquiries you pose to us);
- ii. shall not preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing your Personal Data for our internal business purposes; and
- iii. shall not preclude us from disclosing your Personal Data as described in this Policy for purposes other than sending you promotional and marketing materials.

If you have any questions or concerns about how we handle your Personal Data, or about this Policy, please email us to getsupport@caroniriver.com and we will use our best endeavors to promptly and effectively resolve privacy questions or concerns.