SGS ACADEMY PRIVACY NOTICE

We are committed to being transparent in the way we collect and use your personal data and how we protect it. In accordance with SGS Data Privacy Policy available at https://www.sgs.com/en-pt/privacy-at-sgs and Regulation (EU) 2016/679 of 27 April 2016 (hereinafter referred to as the "GDPR") and the Law no. 58/2019, of 8 August, SGS (the "Company" or the "data Controller") informs you about the processing it will carry out on your personal data ("Data")when you register to and/or purchase a training course on SGS Academy on line Platform (SGS Academy).

1. The Data Controller and its contact details

The Data Controller (Company) is the legal entity which is responsible for the Data collected from you. It determines how, when and why it collects and uses your Data. The Company will depend on who you are: a visitor of SGS Academy or an SGS Customer following the purchase of a course on SGS Academy.

For a visitor of SGS Academy, the data Controller is SGS Société Générale de Surveillance SA, 1 Place des Alpes 1201 Geneva, Switzerland.

For a customer or if you have created an account by registering to SGS Academy, the Data Controller is the SGS legal entity that manages your business relationship. It can be found on your invoice or purchase order or in the agreement you have entered into.

If you have any questions or comments about this Notice, please contact us at:

- By e-mail to 'privacy.pt@sgs.com; or
- Through the online privacy request form available at: https://www.sgs.com/en-pt/online-privacy-statement/privacy-request-form; or
- In writing at: Pólo Tecnológico de Lisboa, Rua Cesina Adães Bermudes, Lote 11, 1600-604 Lisboa, addressed to the Data Privacy Team.

2. The purposes, types of Data collected, legal basis and retention

We may collect, store and process your Data on SGS academy in different ways and for different purposes as follows:

Collection Framework	Types of Data collected	Purposes of processing/ legal basis and retention
Creating a user account	• name, surname • Email address • Log in ID and password • Company name (only if you register as an employee) • When you are required to fill out a registration or contact request form, some fields are mandatory and are highlighted with an asterisk. Failure to respond to these fields may prevent your account from being created	Legitimate interest: To allow you access and use SGS Academy platform in order to purchase a course when requested by you. Retention: Unless you have exercised any of your rights below, we will delete all the data you have provided us with for creating your account if you have not made a purchase for the past two years from your account creation date. Consent: To send you direct marketing communications if you have asked us to. Retention: two years from account creation date unless you have requested to unsubscribe from receiving direct marketing communications.

Subscribing to a course	• postal /billing address (invoicing) • phone number • transaction information (name and type of training, proof of purchase, purchase history) • payment information (tax identification number, bank transaction ID, number and name of the cardholder if online payment available on SGS Academy)	Performance of a contract in order to: • send you a quote estimate • process and follow up on your subscription • manage the payment of your subscription • manage any dispute relating to your subscription Retention: Unless you have exercised any of your rights below, we will keep your information for ten ears from your last purchase. We may keep certain personal data for compliance with applicable laws and regulations (e.g., for tax and audit purposes) and in accordance with our data retention rules. Where it is no longer required to retain data that can still identify you, we will either erase, anonymize or aggregate your information.
Providing you with a course	• Date of birth (only in the case of certifying courses) • Language • Qualification (only in the case of certifying courses) • Learning history (name of course, type of course and date of course taken) Additional personal data may be requested for the provision of a course, such data may not be stored on SGS Academy and will be subject to specific terms and conditions depending on the type of course provided	Performance of a contract in order to: • Provide you with the service requested • Provide you with access to your learning history for ten years • Manage any contact you have with us during the provision of a course • manage any dispute relating to the course provided Retention: Unless you have exercised any of your rights below, we will keep your information for ten years from your last purchase. We may keep certain personal data for compliance with applicable laws and regulations (e.g. for tax and audit purposes) and in accordance with our data retention rules. Where it is no longer required to retain data that can still identify you, we either erase, anonymize or aggregate your information.
Newsletter and commercial communication subscription	• name, surname, email address • company name (if you are using a professional email) • phone number	• To send you marketing communications and newsletters about our training services and courses based on your consent if you have asked us to or based on our legitimate interest in the course of our business relationship with our customers. Retention: two (2) years from account creation date or date of last purchase unless you have requested to unsubscribe. • Based on our legitimate interest, to keep your details on a suppression list

		if you have asked us not to send you direct marketing anymore.
On line browsing	information collected by cookies or similar technology as per SGS Academy cookie preferences available on SGS Academy (cookies are small text files stored on your device when you are on the internet).	The acceptance of cookies is not mandatory in the use of SGS Academy. You can change your cookie preferences at any time by clicking on the 'Cookie Preference section of SGS Academy. You may need to refresh your page for your settings to take effect. Retention: check SGS Academy Cookie Preferences which describes the duration of each cookie. By default, SGS will require visitors to re consent every 6 months from your last cookie preference choice or if you have deleted/cleared your browser cache, or every time we update our CMP.

3. Data Sharing and data transfers

The Data collected and stored in SGS Academy may be shared and transferred with:

a) SGS Affiliates.

- In order to deliver the training courses on-line or offline through streamlined processes, such as to i) to SGS trainers so that they can prepare the training taking into account the requests of each Customer, deliver the training depending on their respective expertise or to ii) SGS center of excellence or competence center to approve and issue the training course certificate.
- In order to manage our business relationship with our customers for the different purposes mentioned above.
- In order to manage and secure SGS Academy platform.

b) The following SGS third party service providers for the purposes mentioned below:

Third Party provider type	**Service type**	**Type of data shared / accessed**	**Location of data center or location of access**	**Security and Transfer mechanism**
Support provider	IT & data Support services	All data	Data access: Australia	Contractual security measures For EU transfers: SCCs
Hosting provider	Cloud hosting services	N/A unless instructed by SGS	Data center: Ireland	Contractual security measures For EU transfers: SCCs

All sharing of information is carried out consistent with the SGS Privacy Policy and we contract with third-party service providers that can provide the same level of data protection and information security that you can expect from SGS. We do not rent or sell any of your Data.

While sharing your Data, SGS may transfer it outside of the country where you reside. If we transfer your Data, we will make sure that it is protected by the following safeguards: the laws of the country to which your Data is transferred ensure an adequate level of data protection or the transfer is subject to data protection

clauses or any other transfer mechanism as required by applicable laws. You will find above the transfer mechanism we have in place with our external service providers who may process your Data on our behalf.

4. Data security

SGS is committed to protect the confidentiality and security of your personal data from unlawful access, alteration, and loss. We ensure that our infrastructures and our provider's one comply with SGS privacy and security policies. Access to such information is limited only to the persons who need to for business purposes. We do not sell your personal data to third parties.

5. Your rights

You may exercise the following rights by sending a written request to this effect to the Company whose contact details are indicated above. Please note that depending on the country where you are located, you may not be entitled to all rights mentioned below and that exercising your rights may result in SGS no longer being capable to provide you with our services:

- **Right to access and to correct.** You have the right to request a copy of the Data we hold about you. However, we need your help in doing this, so please contact us if you want to correct the Data that you have provided us with.
- **Right to object and to restrict.** You have the right at any time to object to the processing of your Data. Under certain circumstances, you also have the right to obtain the restriction/limitation of the processing of your Data.
- **Right to erasure or deletion.** If you no longer wish us to process your Data, you may contact us. We may however retain certain of your Data to continue offering you our services, to comply with applicable laws and regulations and in accordance with our data retention rules.
- **Right to withdraw your consent:** If you have consented to us processing your Data, you have the right to withdraw your consent at any time.
- **Right to data portability:** you have the right to request us to have your data transferred to a third to the extent that this is technically feasible.
- **Right to lodge a complaint.** We make our best to be transparent, protect your Data and offer you as much control as we can. If, however you deem that we did not do it in compliance with applicable privacy and data protection laws, you can contact us. You also have the right to lodge a complaint with the data protection supervisory authority in your country or in the country where your Data Controller is located.
- **Right to control Cookies and other technologies on our websites.** When you first visit our websites, you are asked to consent to the use of cookies and other technologies. You can manage your choice at any time. Please visit SGS Academy Cookies preferences available on SGS Academy.

6. Changes to this Notice

The most recent version of this Notice is on this page. We may modify this Notice at any time without notice, except if such modifications contain substantial changes that may affect individuals' rights under applicable privacy and data protection laws, in which case you will be notified of such changes at the beginning of this page.