

Privacy Policy | Integrity Insight & Integrity Academy

Integrity Insight B.V. (hereinafter: “Integrity”) respects the privacy of every natural person whose personal data it processes. Integrity processes personal data in the context of its services in the field of consultancy, interim and advisory services, as well as in the context of offering and facilitating e-learning under the name Integrity Academy.

In addition, Integrity processes personal data in the context of communication, relationship management, administration, invoicing, the use of digital learning environments, interactive sessions and other activities related to its business operations. In these processing activities, it acts in accordance with the General Data Protection Regulation (GDPR), the Dutch GDPR Implementation Act and other applicable laws and regulations.

This privacy statement explains which personal data Integrity processes, for which purposes these data are used, on which legal bases the processing is based, with which parties personal data may be shared, how long personal data are retained and which rights data subjects have.

1. Identity and Contact Details

Integrity Insight B.V. is a private limited liability company, established at Park Arenberg 64, 3731 ET in De Bilt, The Netherlands, and registered in the Dutch Chamber of Commerce under number 99555506.

Integrity acts as the controller within the meaning of the GDPR for the processing activities described in this privacy statement, unless explicitly stated otherwise.

For questions about this privacy statement or about the processing of personal data, contact can be made via: **info@AMLRtraining.com**.

Integrity has not appointed a Data Protection Officer, as it is not legally required to do so.

2. Whose Personal Data Integrity Processes

Integrity processes personal data of various categories of data subjects, depending on the nature of the relationship and the services provided.

This includes customers and potential customers, contact persons and employees of business clients, participants in training and users of e-learning, persons who contact Integrity via email, website or other communication channels, and persons who participate in consultation hours or other interactive sessions.

Personal data are often provided directly by the data subject, for example when registering for e-learning, when entering into an agreement, when participating in training or during other communication with Integrity.

Integrity may also obtain personal data via business clients, for example when a client registers employees for training or e-learning or when data are made available in the context of an assignment. In such cases, the data concern information necessary for the performance of the services.

3. Responsibility for the Processing of Personal Data

Integrity processes personal data primarily as an independent controller and independently determines the purposes and means of the processing.

In certain cases, particularly when facilitating e-learning for employees of business clients, it may process personal data on behalf of that client. In such cases, Integrity acts as a processor and the relevant client is responsible for the lawfulness of the processing, for having a valid legal basis and for informing data subjects.

If personal data are provided to third parties in the context of the services, such as platform providers or payment processors, this takes place only insofar as necessary for the performance of the agreement. Depending on the nature of the services, these parties act as processors or as independent controllers.

4. Legal Bases for Processing

Integrity processes personal data only if a valid legal basis exists.

Processing may be necessary for entering into and performing an agreement, such as consultancy, interim and advisory services and offering e-learning. Processing may also be necessary for taking pre-contractual measures, for example following a request or contact inquiry.

Integrity also processes personal data insofar as necessary to comply with legal obligations, including obligations relating to administration, taxation and retention requirements.

In addition, Integrity processes personal data based on legitimate interests. These interests include maintaining business relationships, improving and optimising services, managing accounts and digital systems, ensuring the security and continuity of

systems and being able to demonstrate agreements made and services performed. Integrity always makes a careful assessment between its interests and the interests and rights of data subjects.

If processing can only take place based on consent, Integrity will request such consent in advance. Data subjects have the right to withdraw their consent at any time.

5. Which Personal Data Integrity Processes

Depending on the nature of the relationship and the use of the services, this may include identification and contact details such as name, address, place of residence, email address and telephone number. Business details may also be processed, such as company name and job title.

Integrity also processes account details, login information and usage data, as well as data relating to participation in e-learning, such as progress, test results and certifications.

In addition, payment details, invoicing information, correspondence and communication data may be processed. Technical data may also be processed, such as IP addresses, device information and data relating to the use of digital platforms.

For business clients, personal data of employees may be processed in the context of account management, access to e-learning and reporting on progress.

Integrity generally does not process special categories of personal data, unless necessary and supported by a valid legal basis.

6. Purposes of Processing

Integrity processes personal data solely for purposes related to its services and business operations.

These purposes include entering into and performing agreements, registering users and creating accounts, providing access to e-learning, recording and analysing progress and test results and issuing certifications.

Integrity also processes personal data for answering questions and providing support, including via email or external communication tools such as WhatsApp. When using such tools, processing may occur via third-party infrastructure, which may be subject to separate privacy terms.

Personal data are also processed for organising consultation hours and other interactive sessions, for performing consultancy, interim and advisory services and for invoicing and administration.

If agreed, personal data may also be used for reporting to business clients on the progress of their employees.

Integrity further processes personal data for improving and securing systems and services and for complying with legal obligations.

7. Sources of Personal Data

Integrity obtains personal data directly from data subjects, for example through registration, communication or use of the services. Personal data may also be obtained via business clients, for example when employees are registered for e-learning or when data are provided in the context of an assignment.

8. With Whom Integrity Shares Personal Data

Integrity provides personal data to third parties only insofar as necessary for its services, business operations or compliance with legal obligations.

This may include providers of the e-learning platform (such as TalentLMS), payment processors (such as Stripe and PayPal), cloud and storage services (such as Microsoft 365/OneDrive), administrative systems (such as e-boekhouden.nl), engaged specialists and any external complaint handlers.

Where these parties process personal data on behalf of Integrity, Integrity ensures that appropriate contractual arrangements are made.

Where parties such as payment processors independently determine the purposes and means of processing, they act as independent controllers and their own privacy statements apply.

9. Systems and Communication Channels

Integrity uses various digital systems and communication channels, including email, cloud solutions, administrative systems, e-learning platforms and business communication tools such as WhatsApp.

The use of these systems may involve processing personal data via external service providers. Integrity limits such processing to what is necessary and takes appropriate measures to safeguard the protection of personal data.

Integrity does not apply automated decision-making that produces legal effects for data subjects or otherwise significantly affects them.

10. Transfers Outside the European Economic Area

Due to the use of international service providers, personal data may be processed outside the European Economic Area.

In such cases, Integrity ensures that transfers take place only if and insofar as the requirements of the GDPR are met. Where required, it uses an adequacy decision of the European Commission or other appropriate safeguards, such as standard contractual clauses approved by the European Commission.

11. Retention Periods

Integrity does not retain personal data longer than necessary for the purposes for which they are processed, unless a longer retention period is legally required.

Administrative and tax data are retained for the statutory period of seven years. Data relating to user accounts and e-learning are retained for the duration of access and a reasonable period thereafter, insofar as necessary for management, support, evidentiary purposes or completion of services.

Other data are retained as long as necessary for the performance of services or a legitimate interest.

When personal data are no longer needed, they are deleted or anonymised.

12. Security

Integrity takes appropriate technical and organisational measures to protect personal data against loss, unauthorised access and unlawful processing. It takes into account the state of the art, implementation costs, the nature and scope of the processing and the associated risks.

These measures aim to ensure an appropriate level of security and include access restrictions, authorisation management, secure systems and organisational procedures.

13. Rights of Data Subjects

Data subjects have the right to access their personal data and to request rectification, deletion or restriction of processing.

They also have the right to object to the processing of their personal data, particularly if the processing is based on a legitimate interest of Integrity.

Where processing is based on consent, data subjects have the right to withdraw their consent at any time.

Where legally applicable, data subjects also have the right to data portability.

Requests can be submitted via the email address mentioned in this privacy statement. Integrity will handle such requests within the statutory period.

Data subjects also have the right to lodge a complaint with the Dutch Data Protection Authority.

14. Website and Cookies

Insofar as personal data are processed via Integrity's websites, this is done in accordance with this privacy statement.

If cookies or similar technologies are used that require consent, Integrity will inform users separately and request consent where required.

15. Changes

Integrity reserves the right to amend this privacy statement, for example if legislation, case law or its services give cause to do so.

The most current version of the privacy statement will be made available via the relevant websites or other customary channels.