

# PRIVACY STATEMENT OMP ACADEMY CAMPUS

#### INTRODUCTION

This privacy statement explains how your personal data ("you" or "user") will be processed by **OM Partners NV** ("**OMP**" or "us") as part of your registration to and use of OMP's training services and the OMP Academy Campus-application ("**OMP Academy Campus**").

When OMP processes your personal data, OMP acts as **independent data controller**.

This privacy statement aims to enhance the transparency level around the OMP Academy Campus.

#### PERSONAL DATA THAT IS COLLECTED

OMP may collect the following personal data about you as part of the OMP Academy Campus:

First name, last name, gender, email address, job title and role, details about the company for which you are active, location details, phone number, invoicing details, IP address, company ID, language, user ID, login data, coaching and reporting lines, initial ID, (sub)function area, organization level and ID, date in service, date out service, completion rate, certifications, access data, subscription to courses, attendance, scoring rates, feedback from you to teachers and from teachers to you, credit or debit card number (or other payment account number), as well as applicable expiration dates and billing addresses.

#### PURPOSES FOR WHICH OMP COLLECTS AND PROCESSES YOUR PERSONAL DATA

OMP may collect and process your personal data for the following purposes:

- to complete and follow up on your subscription to the OMP Academy Campus including any ordering, payment, billing and communication in this regard;
- to provide you with access to OMP Academy Campus through your user account and process registration, authentication, suspension and revocation of your access rights and privileges;
- to comply with applicable legal or regulatory requirements;
- to comply with requests and communications from competent authorities;
- to provide you the requested training services, to award you a certificate for a course you have completed and to store your training history, including any communication with you in this regard;
- to provide you with user support if you need help using the OMP Academy Campus;
- for internal reporting purposes within the OMP organization;
- to collect and process feedback regarding the OMP Academy Campus;
- to conduct surveys about the OMP Academy Campus and training services you followed, including the processing of these results.

OMP will never rent or sell your personal information to any third party.

## LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

OMP may collect and process your personal data based on the following legal grounds:

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- for the performance of the agreement OMP has with you, your employer or with the company on which behalf you follow the training;
- when processing is necessary in order to protect your vital interests or of another natural person;
- when processing is necessary for compliance with a legal obligation to which OMP is subject;
- on the basis of legitimate interests (e.g. internal reporting, conduct surveys) as long as such interests are not outweighed by your interests.

#### HOW LONG WILL OMP KEEP MY PERSONAL DATA

The OMP Academy Campus does not hold your personal data any longer than is strictly necessary to realize the goals for which your personal data is needed.

## **DISCLOSING YOUR PERSONAL DATA TO OTHERS**

In connection with one or more of the purposes outlined above, OMP may disclose personal data about you to:

- any affiliated companies of OMP;
- third parties that provide services to OMP regarding the OMP Academy Campus, such as the third party cloud provider and its sub-processors;
- your employer or the company on which behalf you follow the training;
- competent authorities; and
- other third parties that reasonably require access to personal data relating to you for one or more of the purposes outlined in the section above.

Please note that some of the recipients of your personal data referenced above may be based in countries outside of the European Economic Area whose laws may not provide the same level of data protection. In such cases, OMP and its sub-processors will ensure that there are adequate safeguards in place to protect your personal data that comply with our legal obligations.

### PROTECTION OF PERSONAL DATA

The OMP Academy Campus takes protecting your personal data very serious and takes appropriate physical, electronic and managerial measures to prevent misuse, loss, unauthorised access, undesired disclosure and improper modifications.

# **HOW DO YOU EXERCISE YOUR RIGHTS**

In accordance with the applicable privacy legislation, you may have various rights in relation to your personal data. In particular, you may have the right to:

- access and receive a copy of your personal and other supplementary information;
- have inaccurate personal data rectified or completed if it is incomplete;
- have your personal data erased;
- request the restriction or suppression of your personal data;
- object to our processing of your personal data when the processing is not the result of our legal obligation to do so or the data does not have to be processed for the execution of the agreements described above;
- obtain the personal data that you have provided to us in a structured, current and machine-readable form (data portability).

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However, your rights are not absolute. There are cases where applicable laws or legal requirements limit these rights and allow or oblige us to refuse to meet your request, such as confidentiality obligations, the privacy rights of others or the protection of our legitimate business interests.

To exercise any of the above-mentioned your rights, please contact OMP at privacy@omp.com. If you are not satisfied with the way OMP has processed your personal data, or with the way OMP has handled your privacy question or request, you have the right to file a complaint with the Belgian Data Protection Authority: Data protection authority, Drukpersstraat 35, 1000 Brussels, https://www.gegevensbeschermingsautoriteit.be

## **CHANGES TO THIS PRIVACY STATEMENT**

OMP may modify or amend this privacy statement from time to time to reflect changes in regulations or laws and descriptions of changes to the OMP Academy Campus. You will be informed when we amend this privacy statement and the revision date at the bottom of this privacy statement will be amended. The amended privacy statement will apply from that revision date.

#### CONTACT

If you have any questions, complaints, or concerns about the way OMP processes your personal data, please contact OMP by email at privacy@omp.com.

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