

CHANGE PARTNERS OÜ

PRIVACY POLICY

Change Partners OÜ (hereinafter 'we') is a training provider and a member of the Union of Estonian Training and Consultancy Firms. We offer our clients intra-organisational training and consultancy solutions for personal and organisational development and boosting organisational efficiency and performance. We carry out studies and diagnostics and advise company management teams.

In this privacy policy, we explain how, when, and why we process your personal data, what values and general principles we follow when processing your personal data, and what your rights are in relation to your personal data.

1. Our values and general principles in the processing of personal data

We operate lawfully. We always have a legal basis for processing your personal data, and we only process your personal data on that basis. We process personal data in a manner that is fair, transparent, and understandable for the person whose data we are processing.

We adhere to the purpose. Before processing any personal data, we establish a legitimate purpose for doing so, and we only process the personal data for that purpose. Upon request, we will disclose our purpose for processing your personal data in a clear and understandable manner.

We collect minimal personal data. We only collect relevant and necessary personal data. We only collect personal data on the basis of the purpose for the processing of the personal data, meaning that we do not collect more personal data than is necessary.

We maintain the accuracy of collected personal data. Where necessary, we update and rectify personal data, if their accuracy is important for the purpose of the processing of the personal data.

We protect your personal data. We approach the processing of your personal data with care and we do our best to ensure that your personal data are secure. We implement various measures (physical, technical, organisational) to protect personal data against unauthorised or unlawful destruction, loss, alteration, disclosure, acquisition, and access.

We choose our partners carefully. We transmit personal data to authorised processors and partners with whom we have previously signed the corresponding agreements. We demand and expect our partners to process personal data carefully and ethically, and to keep personal data secure.

2. Our role as a processor of personal data

We process the personal data of our clients, our partners' representatives, persons that have contacted us via our website, and, on the basis of legitimate interest, potential clients who are not yet our clients (hereinafter 'you').

Our actual and potential clients include both legal persons and natural persons. Given that our training courses are provided to natural persons, this privacy policy also applies to natural persons taking part in our training courses as a representative of a client of ours who is a legal person.

In the processing of personal data, we act as a data processor. As a data processor, we process personal data in accordance with the written instructions of the data controller. As a data processor, we process your personal data in accordance with the written instructions arising from the data processing agreement signed with the client who is a legal person.

3. Method of obtaining personal data

We obtain personal data directly from you when you take part in our training courses or contact us via our website, by e-mail, or by phone, or when you participate in campaigns or events organised by us.

If you are a representative of a legal person who is our client, then we obtain your personal data when signing a training agreement with us or in the course of the performance of a training agreement. As a representative of a client who is a legal person, you may provide us with the personal data of your other representatives and/or staff receiving training.

4. Processed personal data

We process personal data primarily if the data are necessary for the signing and performance of a training agreement, to the minimum possible extent, and only if a clear legal basis exists.

The personal data we process include:

- (1) **personal details**, such as first name, surname, personal identification code, date of birth;
- (2) **contact details**, such as address, phone number, e-mail address;
- (3) **service-related information**, such as information related to the performance of an agreement and the use of a service, enquiries, complaints, payment history;
- (4) **information about satisfaction with a service**, such as answers to non-anonymous satisfaction surveys, service feedback, and references;
- (5) **information from preparatory surveys**, such as the results of pre-training studies and surveys;
- (6) **financial data**, such as credit data or information about liabilities or transactions;

- (7) **communication data**, such as data collected via e-mail, social media, websites, etc.

5. **Purpose and legal basis of the processing of personal data**

We process personal data for the following purposes and on the following legal bases:

No.	Purpose of the processing	Legal basis of the processing
1	Providing a service, negotiating of the terms of the provision of the service, incl. submitting a quote, post-service analysis and feedback	Performance of agreement
2	Exercising our rights and fulfilling our obligations arising from legislation, including accounting obligations	Performance of agreement and fulfilment of our legal obligations
3	Processing your enquiries and requests	Performance of agreement and fulfilment of our legal obligations
4	Sending messages to you	Our legitimate interest
5	Receiving and processing your enquiries, responding to your enquiries	Our legitimate interest
6	Organising campaigns	Your consent

6. **Your rights with regard to personal data**

The General Data Protection Regulation grants you extensive rights with regard to your personal data:

- (1) **right of access** – you have the right to know which personal data we store about you and how we process the data, including the right to know the purpose of the processing, the persons to whom we disclose your personal data, information about automated decision-making, and the right to receive copies of your personal data;
- (2) **right to rectification** – you have the right to have us rectify insufficient, incomplete, and incorrect personal data;
- (3) **right to withdraw consent** – if you have given us consent to the processing of your personal data, you have the right to withdraw that consent. Please note that withdrawing your consent has no effect on the lawfulness of any processing carried out on the basis of that consent before its withdrawal;

- (4) **right to erasure ('right to be forgotten')** – you have the right to have us erase your personal data (e.g., if you withdraw your consent to the processing of your personal data or if the personal data are no longer necessary for the purpose for which they were collected). We have the right refuse to erase your personal data, if the processing of the personal data is necessary for fulfilling a legal obligation, exercising the right to freedom of expression and information, establishing, exercising, or defending legal claims, or for reasons of public interest. We have the right to retain personal data, unless the person whom they concern or a related institution has requested the erasure of the data;
- (5) **right to restriction of processing** – in certain cases, you have the right to prohibit or restrict the processing of your personal data for a certain period of time (e.g., if you have objected to the processing of your personal data);
- (6) **right to object** – you have the right to object to our processing of your personal data, if your personal data are processed on the basis of our legitimate interest or public interest. You may object to the processing of your personal data for direct marketing purposes at any time and we will respond immediately;
- (7) **right to data portability** – if the processing of your personal data is based on your consent and the processing is automated, then you have the right to receive your personal data, which you have provided to us as a data controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller. You also have the right to have us transmit your personal data to another data controller, if this is technically feasible.

For more information about your rights, see chapter III of the General Data Protection Regulation.

If you wish to exercise any of your rights related to the processing of your personal data or if you have questions about the processing, please send us an e-mail at: info@changepartners.ee. We generally respond within one week and if our response requires the issue of personal data, we will first verify the identity of the requester.

If you unhappy with our response, you may contact the supervisory authority (www.aki.ee) at any time.

7. **What to do in the event of a personal data breach?**

Please notify us immediately of any personal data breach or risk thereof that you are aware of by sending an e-mail to info@changepartners.ee. We take personal data security very seriously and will respond immediately to any potential breach.

8. **What are 'cookies' and why do we use them?**

Our website uses 'cookies', which you will be asked to accept if you decide to use our website. 'Cookies' are small text files that are saved on your computer's hard drive when

you visit a website. Cookies enable us to improve our website services and make them more convenient for you.

We collect information about how you interact with our website. In addition, we may collect information about your computer or device, such as your IP address, web browser, and language settings. These data are used for statistical purposes to improve our website and show you customised content.

If you prefer your personal data not to be processed on our website, you may activate your web browser's private browsing function.

9. How long do we store personal data?

We store personal data for as long as it is necessary for achieving the objectives of our project or until the client requests us to erase the personal data.

For example, personal data that are processed for fulfilling a legal obligation are stored for as long as the respective legal obligation is valid (e.g., obligation under the Accounting Act: 7 years). Personal data relating to disputes are stored until the expiry of the claim.

10. Where is our current privacy policy published?

Our current privacy policy is published online at www.changepartners.ee. Please bear in mind that we may update our privacy policy from time to time.