

PRIVACY POLICY

RiskWize Limited trading as EssentialSkillz (“we”, “us”, “our”) are committed to protecting and respecting your privacy.

This privacy policy (“**Privacy Policy**”) and any other documents referred to herein, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.web2.workwize.com, or www.web3.workwize.com, (“**Site**”) or logging in to our courses section, entering personal information and taking one or more of our courses, (“**Services**”), you are accepting and consenting to the practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Site or login to use our Services.

DATA CONTROLLER

For the purposes of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, (“**GDPR**”), the Irish Data Protection Act 2018 and any applicable national implementing laws, regulations and secondary legislation relating to the processing of personal data (together “**Data Protection Law**”), the data controller is RiskWize Limited of Galway Technology Park, Parkmore, Galway, Ireland.

LEGAL BASIS FOR PROCESSING

We collect and use the personal data described below in order to provide you with access to our Site and Services in a reliable and secure manner. We also collect and use personal data:

- For our legitimate business needs.
- To fulfil our contractual obligations to you.
- To comply with our legal obligations.

To the extent we process your personal data for any other purposes, we ask for your consent in advance or require that our partners obtain such consent.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following information about you:

Information you give us. You may give us the following information when you fill in forms on our Site or correspond with us by phone, email or otherwise. This includes information you provide when you register to use our Services, subscribe to our Services, login to use Services, and when you report a problem with our Site or Services.

- **Interest in Services:** If you have an interest in obtaining information about our Services; request customer support; contact us; register to use our Site or Services; sign up for an event or webinar; or download content, we may require you to provide your contact information (your first name, surname, employee ID, company name, phone number, email address or username and password).
- **Surveys:** If you voluntarily submit certain information to our Services, such as filling out a survey about your experience or provide any feedback, we may collect the information you have provided including a digital signature.

Information we collect about you. If you interact with our Services, Sites or emails, we automatically collect information about your device and your usage of our Services, Sites or emails (such as Internet Protocol (IP) addresses or other identifiers, which may qualify as Personal Data. With regard to each of your visits to our Site or Services we may automatically collect the following information using common information-gathering tools,

such as cookies, web beacons, pixels, and similar technologies about your device, and your use of our Site and Services.

- **Technical information:** including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- **Information about your visit:** including the full Uniform Resource Locators (URL) clickstream to, through and from our Site and Services (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information from other online accounts:** where you have given us permission to collect data from within your settings or the privacy policies of these other online services: For example, this can be from the integrations and connections that you choose to install when using the Site or Services.

Information we receive from other sources. We may receive information about you from third parties (for example, your employer) where such information is provided in order to facilitate your registration and use of Services.

Information collected by third parties. We work closely with third parties (including, for example, business partners, sub-contractors in technical services, analytics providers) and may receive information about you from them.

- **Amazon Web Services:** to host the Workwize application
- **Google:** to provide analytics and allow us to chat/communicate with customers including via emails
- **Simplybook:** to allow users to schedule calls and training with our support team
- **LiveChatoo:** to provide integrated live-chat capability for users

COOKIES

We use cookies on our Site and in the Services to distinguish you from other users of our Site and Services. This helps us to provide you with a good experience when you browse our Site and also allows us to improve the Site and Services.

What are cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the Site. Cookies can be “persistent” or “session” cookies.

We use persistent cookies and session cookies.

Persistent Cookies

A persistent cookie is stored on a user’s device in between browser sessions which allows the preferences or actions of a user across the Site (or in some cases across different websites) to be remembered. We use persistent cookies to save your login information for future logins to the Site or Services.

Session Cookies

A session cookie allows the Site or Services to link your actions during a browser session. We use session cookies to enable certain features of the Site or Services, to better understand how you interact with the Site or Services and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site or Services and then close your browser.

Which cookies we use and why

The table below explains the cookies we use and why we use each of them.

For the purpose of authentication and system preferences persistence in browsers the system uses a number of application cookies both session and browser ones as typical for any web based application.

Name	Type	Expiry	Description
OLAS[ID]	Browser	365 days	Cookie to remember tenant ID (company ID)
WEB1/WEB2/WEB3	Session		Application session cookie to store information about logged in user
_ga	Browser	2 years	Google Analytics tracking service
_gat	Browser	60 seconds	Google Analytics tracking service
_gid	Browser	1 day	Google Analytics tracking service

AWSALB	Browser	7 days	AWS Load Balancer service
AWSALBCORS	Browser	7 days	AWS Load Balancer (CORS) service
SsoSAML	Session		Single Sign On service
SsoSAMLAuthToken	Session		Single Sign On service
lctpref	Browser	30 days	Live Chat (if enabled)
__utma/__utmb/__utmc/__utmz	Browser/Session	variable	Live Chat (if enabled)
CloudFront-Policy	Session		CDN content protection service
CloudFront-Key-Pair-Id	Session		CDN content protection service
CloudFront-Signature	Session		CDN content protection service

You can set up your browser options, to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or all functionality of the Services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

USES MADE OF THE INFORMATION

We use information held about you in the following ways.

Information you give to us. We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us;
- To provide you with the information, products and services that you request from us;
- To notify you about changes to our Site and Services;
- To ensure that content from our Site and Services is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- To administer our Site and Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To inform you about scheduled downtimes and new features;
- To improve our Site and Services to ensure that content is presented in the most effective manner for you and your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our Site and Services safe and secure;
- To monitor your use of the Sites and Services is in compliance with any legal agreements with have with you;

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We will not sell or rent your personal data to anyone.

DISCLOSURE OF YOUR INFORMATION

Information we share with third parties. We may share your information with selected third parties including:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you to provide services such as email communications, hosting services, backup services, including: Google, AWS, LiveChatoo, Simplybook.
- We may share anonymous and aggregated usage data and reports in the normal course of operating our business; for example, we may share information with other Site or Services users, our customers or publicly to show trends or benchmark the general use of our Site and Services.

Information we disclose to third parties. We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or a member of our group of companies or substantially all of their assets are acquired by a third party, in which case personal data held by them about their customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions, terms of use and/or any other legal agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

Our Services are global and your information (including personal data) may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer your information to countries outside of your country of residence, which may have data protection rules that are different from those of your country of residence.

The personal data that we collect from you may therefore be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**") or the UK. It may also be processed by staff operating outside the EEA or UK who work for us or for one of our suppliers or partners. Such staff or subcontractors may be engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the EEA or the UK.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("**Standard Contractual Clauses**").

Our Site and Services are accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site or Services from outside the EEA or the UK. This means that where you chose to post your data on our Site or within the Services, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA or the UK may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

PROTECTION OF YOUR INFORMATION

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site or Services, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or the Services. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

LINKS TO OTHER WEBSITES

Our Site and Services may, from time to time, contain links to and from the websites of our partner networks, affiliates, or third party content providers. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not

accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

YOUR RIGHTS

You have the following rights under Data Protection Law which can be exercised free of charge:

- The right to be informed - this means we must inform you how we are going to use your personal data. We do this through this Privacy Policy and by informing you how your data will be used each time we collect it.
- The right of access - you have the right to access your personal data (e.g. data that is about you) that we hold. This is called a Subject Access Request (SAR).
- The right to rectification - if you think the data we hold on you is incorrect, tell us so we can put it right.
- The right to erasure - you have the right to request that we delete your data. We will do so, provided that we do not have a compelling reason for keeping it
- The right to restrict processing - you can change your communication preferences (therefore restricting how we communicate with you).
- The right to data portability - you can obtain and reuse your personal data for your own purposes across different services.
- The right to object to data processing – you can formally object to any of our personal data processing activities.
- Rights in relation to automated decision making and profiling – this is not something we do.
- Right to withdraw your consent to us processing your personal data, at any time.

You can make a request in relation to any of the above rights by contacting us as set out at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of Data Protection Law.

DATA RETENTION

We retain personal data for as long as necessary for the relevant activity for which it was provided or collected. This will be for as long as we provide access to the Site or Services to you, your account with us remains open or any period set out in any relevant contract you have with us. However, we may keep some data after your account is closed or you cease using the Site or Services for the purposes set out below.

30 days after you have closed your account we usually delete personal data, however we may retain personal data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our legal agreements, or fulfil your request to “unsubscribe” from further messages from us.

We will retain de-personalised information after your account has been closed.

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other

users may have copied from the Site or Services. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

COMPLAINTS

If you have any complaints about our use of your personal data, please contact us as set out at the end of this Privacy Policy or contact your local data protection supervisory authority:

- For individuals located in the EU: The Irish Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.

For individuals located outside the EU: your local data protection supervisory authority in the country in which you are located.

AGE OF USERS

This Site and the Services are not intended for and shall not be used by anyone under the age of 16.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

This Privacy Policy was last updated on the 18th of August 2020 and this version replaces any other Privacy Policy previously applicable from this date.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

By post: EssentialSkillz, Galway Technology Park, Parkmore, Galway, Ireland.

By email: at support@essentialskillz.com or by writing to: EssentialSkillz, Galway Technology Park, Parkmore, Galway, Ireland.