

## **VINDA LT Private Statement Policy**

VINDA LT is a training and recruitment business services and which provides training courses services to its clients. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our training course, or we may collect them from another via web site. The Company must have a legal basis for processing your personal data. For the purposes of providing you with training and recruitment services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

### **1. Collection and use of personal data**

#### **a. Purpose of processing and legal basis**

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with training and recruitment courses services. The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

#### **b. Legitimate interest**

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- VINDA LT provides training and recruitment courses services to candidates and clients as part of our business. We process personal data in order to be able to provide these services. It is in the legitimate interests of all parties involved that the training business can process personal data.

#### **c. Recipient/s of data**

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Primarily we will share your information with our Accreditation body GWO organization or employment client. Unless you specify otherwise, we may also share your information with associated third parties such as our service providers where we feel this will help us to provide you with the best possible service. We may also share your data as required by law, regulatory bodies or for tax or audit purposes.

#### **d. Statutory/contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We will be unable to provide training course or recruitment services for you.

## **2. Overseas Transfers**

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with training and recruitment services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

## **3. Data retention**

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

The Conduct of Training course and recruitment Businesses our accreditation body or client, require us to keep candidate records for at least five years from

(a) the date of their creation or

(b) after the date on which we last provide you with training course services.

We must also keep your invoices, CV, current certificates, completion of training courses records, receipts, services agreements records for as long as is legally required by Local Tax Authority and associated social security and tax legislation.

Where the Company has obtained your consent to process your personal and sensitive personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data and sensitive personal data.

If we have no meaningful contact with you for a period of 5 years, your personal data will be deleted unless we are required to keep it by law, for a regulatory body or for tax or audit purposes.

## **4. Your rights**

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;



- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting us at [info@vinda.lt](mailto:info@vinda.lt)

## 5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact us at [info@vinda.lt](mailto:info@vinda.lt)

You also have the right to raise concerns with Information Commissioner's Office on **+370 607 41711** or at [info@vinda.lt](mailto:info@vinda.lt) , or any other relevant supervisory authority should your personal data be processed outside of the EU, if you believe that your data protection rights have not been adhered to.

Please call us on +370 607 41711 or e-mail us at [info@vinda.lt](mailto:info@vinda.lt) if you have any questions.

## VINDA LT

Offshore/Onshore Training Centre

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