

Privacy and Cookies Policy of;

RGMi Limited a company registered in Ireland under company registration number 783560 whose registered office is at 174 Walkinstown Road, Walkinstown, Dublin 12, D12 K6NT, Ireland.

This Privacy and Cookies Policy is effective from 1 June 2025.

RGMi Limited (we refer to ourselves as "**we**", "**us**" or "**our**" in this document). We are committed to ensuring that your privacy is protected. This Privacy Notice describes how we use the personal information that we collect from you, or that you provide, when you:

- visit any of our websites, portals or online learning environments (the "Website");
- use the educational services, testing, certification, products, and consultancy services (together the "Services") that we provide; or
- communicate with us.

About this Privacy and Cookies Policy

Data protection laws, all applicable data protection laws in relation to this Agreement, including the General Data Protection Regulation EU 2016/679 ("**GDPR**") and any national laws or regulations constituting a supplement, replacement or successor data protection regime to that governed by GDPR (including Ireland's Data Protection Act 2018). The RGMi Limited Privacy Policy and Cookies Policy document is incorporated into the General Terms and Conditions of sale.

In this Privacy and Cookies Policy, references to "you" means any person submitting any data to us or to this Website about themselves or about any other living individual in respect of any use of the Website or the products available through the Website (each being a "Product"). When you use different aspects of the Website, we may ask you to supply us with various information about you or anyone whom you represent. This Privacy and Cookies Policy sets out the way in which we may use such information.

We are committed to protecting and respecting your privacy. This Privacy and Cookies Policy (together with our "RGMi Limited General Terms & Conditions of Sale" and any other documents referred to in it) 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. For the purpose of the Data Protection Act 1998 - Ireland (the Act), the data controller is RGMi Limited.

If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy and Cookies Policy. This policy may change from time to time (see Changes to this Privacy and Cookies Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Information we collect

We collect personal information from you:

- through the use of forms, which may be on paper or on our Websites, such as when you login to access our Services, signup to receive our newsletters, register for information or commence a course of study;
- when you communicate with us for any reason, including by email, postal mail or telephone, and when you use our Services.

Information that we collect automatically

When you visit our Website(s), we may collect certain information automatically from your device. The information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website(s), including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website(s) is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website(s) to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading 'Cookies', below.

Information we obtain from third party sources

We may receive personal information about you from third party sources (such as your employer or other third party if they enrol you on a course or create an account on your behalf) but only where we believe that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. We collect only the minimum amount of information required from these third parties to enable us to provide the requested service. We only use the information we receive from these third parties as set out in this Privacy and Cookies Policy.

Use of your information

Our legal basis for collecting and using your information to reach out to you is in our legitimate interests and does not overwrite your data protection interests or fundamental rights and freedoms. Our legitimate interests in this case is to offer you content we believe is in line with the theme of our website and you would want to publish, this is why we need to process your data. For this purpose, other than retaining a learners notes and RGMi digital certificate details, we will hold your data for 12 months after engagement.

The information that we collect and store relating to you is primarily used to enable us to provide our Services to you. In addition, we may use the information for the following purposes:

- To provide you with information or Services you request from us;
- To provide information on other RGMi Limited products and Services which we feel may be of interest to you, in accordance with your communications and consent preferences;
- To meet our contractual commitments to you;
- To act on your behalf where third party involvement is available and appropriate – for example through a third party specialist training provider or certification/awarding body;
 - To respond to you over any queries you raise with us.
 - To enable you to have a password resent to you if you tell us or the Website(s) that you have forgotten it.
 - To record and track details of transactions you carry out through or via the Website(s) and of the fulfilment of your orders.
 - To monitor and analyse trends, usage and activities in connection with our Website(s) / Services; and
 - As necessary to prevent or detect crime.

We may also monitor or record telephone calls for training, customer service and quality assurance purposes, and to detect or prevent crime. These recordings will be retained for a maximum of 30 days.

In general, we will use any of the information we collect from you only for the purposes described in this Privacy and Cookies Policy or for purposes that we explain to you at the time we collect such information.

Storing and Retaining your personal data

The personal information you provided to us is stored within secure servers. We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Where we have given you (or where you have chosen) a password so that you can access certain parts of our sites and portals, you are responsible for keeping these passwords confidential.

Please note that the transmission of information via the internet (including email) is not completely secure and therefore, although we endeavour to protect the personal information you provide to us, we cannot guarantee the security of data sent to us electronically and the transmission of such data is therefore entirely at your own risk. We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business or statutory need to process your personal information, we will either delete or anonymise it.

Disclosing your information

We will disclose, where required, your personal information with:

- Third party service providers and partners who provide data processing services to us (for example, to support the delivery of Services), or who otherwise process personal information for purposes that are described in this Privacy Notice;
- Your employer, where they have instructed us or funded the goods or services provided to you. This may include progression, assessment, attainment or exam results as well as other personal data as and when required;
- Any product evaluation or feedback comments you provide may be shared with the purchasing organisation or course vendor;
- Any third party in connection with, or during negotiations of, any merger, sales of company assets, financing or acquisition of all or a portion of our business by another company;
- Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation (and we may not be able to inform you so as not to compromise any investigation or other proceedings), or otherwise to protect our rights or the rights of any third party; and to
- Any other person with your consent to the disclosure.

Third party links

You might find links to third party websites on our Website(s) or within documentation we provide.

If you access other websites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their own Privacy Notices which you should review.

We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Social Networking

The Website(s) may offer you the opportunity to share or follow information about us (or the Website or our Services) using third party social networking functionality (such as through "share this", "like" or "follow" buttons). We offer this functionality in order to generate interest in us, the Website and our Services among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about us with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly-available, including through Internet search engines.

Please note that we do not exercise, endorse, secure or control the policies or practices of any third party social network whose functionality you may access through the Website(s).

You should always carefully read the Privacy Notice of any social network through which you share information in order to understand their specific privacy and information usage practices.

International data transfers

RGMi Limited is organisation with global reach. In order to provide our Services to you, your personal data may be transferred to, stored in and processed in, countries outside of the EEA. It will be processed by entities and individuals operating outside of the EEA for the purposes of providing the Services to you.

These entities and individuals include subsidiaries and affiliates of RGMi Limited as well as various business partners and counterparties. Transfers of your personal data are legally permitted, amongst other mechanisms, under the Group's intra-group data sharing agreement and contractual agreements that include standard contractual clauses for controllers, and where relevant for processors. When we transfer, store, or process your data, we do so in accordance with this Privacy Notice and applicable law, including the implementation of appropriate and adequate safeguards in seeking to ensure that personal data is transferred to an adequate level of protection.

Lawful basis (EEA visitors only)

Our lawful bases for collecting and using personal information will depend on the personal information being collected and the specific context in which we collect it. However, we will normally collect personal information from you only:

- where we need the personal information to perform a contract with you (for example, to enrol you into a course or provide you with learning materials);
- where the processing is undertaken on the grounds of legitimate interest and is not overridden by your rights; or
- where we have your consent to do so.

In some cases, we may also have a legal obligation to collect personal information from you.

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the lawful bases on which we collect and use your personal information, please contact us using the contact details provided below.

Sale of personal data

We do not “sell” or “share” Personal Information as those terms are defined under The Irish Data Protection Act. 2018. To the extent Personal Information is shared with third parties, it is only provided to third party service providers/processors.

Data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided below.
- You have the right to **opt-out of marketing and telemarketing communications** we send you at any time. You can exercise this right by clicking on the "Manage your Marketing Preferences" link in the marketing e-mails we send you.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Cookies

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information. Cookies set by us are called "first party cookies". Cookies set by parties other than us are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the Website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognise your computer both when it visits the website in question and also when it visits certain other websites.

Why do we use cookies?

We use cookies to provide easier navigation around the sites and gather anonymous analytics information. In some cases, cookies are used to provide functionality within sessions, such as within portals or learning environments. Some cookies are required for technical reasons in order for our Websites to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Websites. For example, we may use Google Analytics (a third party cookie) within our Websites to monitor how visitors have landed on our Website, and how they consequently navigate it. This is done so that we can see aggregated (not individual) statistics about which content our users access most frequently.

We categorise cookies as follows:

- **Necessary** cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

- **Preference** cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- **Statistic** cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing** cookies are used by publishers and third party advertisers to track visitors across websites based on your browser and device, to build a profile of your interests and provide adverts that are more relevant and engaging. Disabling these cookies will not prevent or reduce advertising, just make it less relevant.
- **Unclassified** cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

From time to time we may have links to other services such as social media or video services on our Website. These third party services may set cookies on your device when you use them. Due to the nature of how cookies work, we cannot access these cookies nor control their use. Likewise, these third party services cannot access our session or analytics cookies.

How can you control cookies?

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission. You have the right, therefore, to choose whether or not to accept non-essential cookies and to set your own cookie preferences on your device.

RGMi Limited has implemented a cookie management tool on its websites that allows you to select which of the optional cookie classifications can be set. By choosing not to set some of these cookies certain features of the Website cannot be provided and you may not be able to enjoy the Website to its fullest. When cookie retention settings expire, you will be presented with the cookie management interface to refresh your selection. Where you wish to review the settings of the cookies on subsequent visits, you can clear the cookies from your browser and the management tool will reappear to allow you to review and select appropriate cookies. All web browsers are different and to learn how to change your cookie preferences, check the "Help" menu of your browser.

For more information about cookies, cookie management and how to control cookies within your browser, please see the allaboutcookies.org website.

Unless the user's browser has been configured so that it will refuse cookies, our Websites notify the user that the site makes use of cookies and allows the user to customise their browser to configure their preferences.

Updates to this Privacy and Cookies Policy

We may update this Privacy and Cookies Policy from time to time to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Notice regularly to stay informed about our use of cookies and related technologies.

The date at the top of this Notice indicates when it was last updated.

Contacting Us

If you have any questions about our use of cookies, please do not hesitate to contact us, via email at info@rgminstitute.com.