

## **BowTie Learning Website**

Please read this Privacy Policy carefully, as it governs how you use BowTie Learning Ltd. If you do not agree to this Privacy Policy, please do not use the BowTie Learning Ltd. Website.

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## **Purpose**

BowTie Learning Ltd. ("BowTie Learning Ltd.," "we," or "us") is committed to protecting your privacy, we take data protection and privacy very seriously. This Privacy Policy ("Policy") describes how BowTie Learning Ltd. collects, uses, shares and secures the personal information you provide when you visit the Websites owned and operated by BowTie Learning Ltd., and when you use our Service(s). It also describes your choices regarding use, access and correction of your personal information. The use of information collected through our Service(s) shall be limited to the purpose of providing the service for which you have engaged BowTie Learning Ltd. The capitalized terms used in this Policy but not defined herein shall have the same meaning as defined in our Terms of Service at ("Terms").

## **Use of your Personal Information and Other Data**

BowTie Learning Ltd. uses this Privacy Policy to govern the use of personal information you provide to us. We use your personal information solely to provide our services to you. We also use your Personal Identifiable Information (PII) together with other Personally Non-Identifiable Information (non – PII) to help us better understand our users and to improve the content and functionality of our site.

## Personal Identifiable Information

We may collect the following personal information from you in the following situations.

1. When you visit our website and voluntarily provide the following information via one of our contact forms, via a chat or phone session, or as part of a purchase of one of our courses or register on our site. We may collect the following types of information:

Contact Information, such as name, email address, mailing address, phone number, IP.

Information about your business, such as company name.

Billing Information, such as credit card number and billing address.

**(Note: All payment transactions are processed through secure payment gateway providers. We do not store any card information in our servers.)**

2. When you use our site to respond to our support system or respond to our surveys.  
*Contact Information*, such as name, email address, mailing address, IP address, geographic location, or phone number.  
*Unique Identifiers*, such as username, or password  
Name and e-mail address when you provide feedback from the Service(s)

Users may, however, visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

## Non-Personal Identifiable Data:

We capture some Non Identifiable data in our logs. The data in the logs includes

- Device type
- Browser type
- Language preference,
- Time zone,
- Screen size
- Referring / exit pages

## Use of Personal Information

We may use the personal information collected from within the Website or when you use the Service(s) to:

- Provide you with the Service(s).
- Send you communication from the Service(s).
- Assess the needs of your business to determine or suggest suitable products.
- Send you requested product or service information.
- Respond to customer service requests.
- Administer your account.
- Send you promotional and marketing communications.

- Personalised Advertisement
- Facilitate your transactions with other users when you use our Service(s).
- Perform statistical analyses of user behaviour and characteristics at an aggregate level in order to measure interest in and use of the various areas of the site.

When you provide us with personal information about your contacts we will only use this information for the specific reason for which it is provided.

### **Share**

If your subscription was provided by your employer or a BowTie Learning Ltd. Authorised training partner, we will share information, including personal information with them. We may transfer personal information to sub-contractors that help us provide our Service(s). Transfers to subsequent third parties are covered by the service agreements with our data-processors. We reserve the right to disclose your personal data as required by applicable law, in response to lawful requests by public authorities, including meeting national security or law enforcement requirements and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or other legal process served on us.

In the event BowTie Learning Ltd. goes through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, your user account and personal data will likely be among the assets transferred. You will be notified via email and via a prominent notice on our Websites of any such change in ownership or control. We may also disclose your personal information to any other third party with your prior consent.

### **Data from Third Parties**

We also obtain data from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time, but have included:

- Social networks when you grant permission to access your data on one or more networks.
- Existing or past learners who participate in our referral program.
- Service providers that help us determine a location based on your IP address in order to customize certain products to your location.
- Partners with which we offer co-branded services or engage in joint marketing activities, and
- Publicly-available sources such as open government databases or other data in the public domain.

We may receive Personal Information about you from other sources like postal mail, telephone or fax. We may add this information to the information we have already collected from you via the Site in order to improve the products and services we provide.

### Correction, Removal or Export of Personal Information

BowTieLearning Ltd. acknowledges that you have the right to access, edit and delete your personal information at any time. Upon request, we will provide you with reasonable access to the personal information we collect about you. You will have the opportunity to correct, update, modify or delete this information as follows:

- If you have independently signed up with BowTieLearning Ltd.  
You may access, update or export your Personal Information included in your online BowTieLearning Ltd. account at any time by logging into your account and going to your profile or by reaching out to us
- If you are using an enterprise-provided account (BowTieLearning Ltd. Authorised Training Partner or your Employer)

**Exceptions in Deletion:** If you request access to your personal information and discover that that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers or backup systems

**Exception in Data Portability:** There may be limits to the amount of information we can practically provide. For example, we may limit an individual's access to personal information where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy or where doing so would violate others' rights.

**Exception in Data Correction:** Even after updates to your Personal Information, we may maintain and store older versions of such information within our databases, access logs and other records in order to comply with other routine data audits.

### Cookies and Other Tracking Technologies

BowTieLearning Ltd. and our third-party partners, such as our advertising and analytics partners use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. The types of cookies used by BowTieLearning Ltd. includes

- *Essential Cookies:* These cookies are essential for the basic functionalities offered by the Site and Service(s). These class of cookies helps in keeping a user logged in to the Service(s) and remember relevant information when they return to the Service(s).
- *Insight Cookies:* These are used for tracking the user activities within the Service(s), which in turn helps us in improving your user experience.
- *Marketing Cookies:* These are used for providing you with customized and interest-based ads based on your browsing behaviour and other similar activities on our Websites

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser

is different, look at your browser's Help Menu to learn the correct way to modify your cookies. If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

### **Advertisement**

We partner with third parties to manage our advertising on other sites. Our third party partners may use technologies such as cookies to gather information about your activities on our Website and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by sending an email to [info@bowtielearning.com](mailto:info@bowtielearning.com).

### **Analytics & Web-beacons**

BowTieLearning Ltd. uses third party software for analytics. All metrics information collected from your usage of the Service(s) shall be transmitted to our analytics provider. This information is then used to evaluate how users use our platform, and to compile statistical reports on user activity for us. We further use the same statistical analytics tool to track or to collect your Personally Identifiable Information (PII). We will use this information in order to maintain, enhance, or add to the functionality of the Service(s) and to personalize the experience for you. Aggregated information and analysis may be made public where desired by BowTieLearning Ltd.

We and our third party advertising partners use technologies such as web beacons in analysing trends, administering the website, tracking users' movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

### **Do Not Track**

Currently, various browsers — including Internet Explorer, Firefox, and Safari — offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to Web sites' visited by the user about the user's browser DNT preference setting. BowTieLearning Ltd. does not currently commit to responding to browsers' DNT signals with respect to the Company's Web sites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. BowTieLearning Ltd. takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

### **Links to Third Party Sites**

Our Websites contain links to other websites that are not owned or controlled by BowTieLearning Ltd. Please be aware that we are not responsible for the privacy practices of such other websites or third parties. We encourage you to be aware when you leave our

Websites and to read the privacy policies of each and every website that collects personal information.

### **Public Forums**

Our Websites offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, reach out to us. In some cases, we may not be able to remove your personal information, in which case we will let you know that we are unable to do so and why. BowTie Learning Ltd. may provide bulletin boards, blogs, or community threads on the Company's Web sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. BowTie Learning Ltd. is not responsible for the personal information you choose to submit in these forums.

Remember that when you share information publicly, it may be indexable by search engines.

### **Single Sign-On & Other social Media Features**

Our Websites include social media features, such as the Facebook "Like" button, the "Share This" button or interactive mini-programs. Where we have your consent, these features may collect your IP address, which page you are visiting on our Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Websites. Your interactions with these features are governed by the privacy policy of the company providing them.

You can log in to our Websites using sign-in services by LinkedIn. The services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address.

### **Communications from the Websites**

We may use your email address to send our newsletters and/or marketing communications. If you no longer wish to receive these communications, you can opt out by following the instructions contained in the emails you receive or by contacting us at [info@bowtielearning.com](mailto:info@bowtielearning.com).

We will send you announcements related to the Service(s) on occasions when it is necessary to do so. For instance, if our Services) is temporarily suspended for maintenance, we might send you an email. Generally, you may not opt-out of communications which are not promotional in nature. If you do not wish to receive them, you may delete your Account.

### **Information Security**

Our Websites and Service(s) have industry standard security measures in place to protect against the loss, misuse, and alteration of the information under our control. When you provide us with sensitive information (such as credit card information or login credentials), we will encrypt that information via Secure Socket Layer (SSL).

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Websites or via the Service(s) and any transmission is at your own risk. Once we receive your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

- Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.
- We use regular Malware Scanning.
- Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.
- All payment transactions are processed through secure gateway providers and are not stored or processed on our servers

### **Testimonials**

We post customer testimonials/comments/reviews on our Websites which may contain personal information. Prior to posting the testimonial, we obtain the customer's consent to post their name along with their testimonial. If you want your testimonial removed, please reach out to us.

### **Children's Personal Information**

BowTie Learning Ltd. does not knowingly collect any personal information from children under the age of 16. If you are under the age of 16, please do not submit any personal information through our Websites or Service(s). We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide personal information through our Service(s) or Websites without their permission.

If you have reason to believe that a child under the age of 16 has provided personal information to us through our Websites or Service(s), please contact us and we will endeavour to delete that information and terminate the child's account from our databases.

### **Amendments**

BowTie Learning Ltd. has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site, revise the updated date at the bottom of this page and send you an email. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

Your continued use of this Websites or the Service(s) following the posting of any amendment, modification, or change to this Policy shall constitute your acceptance of the amendments to this Policy. You can choose to discontinue use of the Websites or Service(s), if you do not accept the terms of this Policy, or any modified version of this Policy.

### **Contacting BowTie Learning Ltd.**

If you have any questions about this privacy policy or your dealings with the BowTie Learning Ltd., you can reach out to us via email at [info@bowtielearning.com](mailto:info@bowtielearning.com).

You can also reach out to us through postal mail at:

BowTie Learning Ltd.  
35 Meadow Close  
Rathfarnham  
Dublin D16 HN27  
Ireland