

## PRIVACY NOTICE

### Introduction

Welcome to The Lean Six Sigma Company's privacy notice. The Lean Six Sigma Company is the trading name of TLSSC Limited. TLSSC Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

#### 1. Important information and who we are

**Purpose of this privacy notice:** This privacy notice aims to give you information on how TLSSC Limited collects and processes your personal data through your use of our website ([www.theleansixsigmacompany.co.uk](http://www.theleansixsigmacompany.co.uk)), including any data you may provide through this website when you sign up to our newsletter or purchase a product or service. This website is not intended for children and we do not knowingly collect data relating to children.

**Controller:** TLSSC Limited is the controller and responsible for your personal data (collectively referred to as "The Lean Six Sigma Company", "we", "us" or "our" in this privacy notice).

#### 2. The data we collect about you

*Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).*

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
  - apply for our products or services;
  - create an account to our access our courses or course materials or ;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
  - Technical Data – Analytics Providers, Advertising Networks and Search Information Providers
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data:

- To Register you as a new customer
- To enable you to use our online learning environment or access an online self-paced course
- To enable you to sit our digital exam(s)
- To enable you to receive your digital certification
- To process and deliver your order including:
  - Manage payments, fees and charges
  - Collect and recover money owed to us
- To manage our relationship with you which will include:
  - Notifying you about changes to our terms or privacy policy.
  - Asking you to leave a review or take a survey
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
- To use data analytics to improve our website, products/services, marketing, customer relationships and experience.
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## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you.

You may receive marketing communications from us if you have requested information from us or purchased services from us if you provided us with your details and, in each case, you have not opted out of receiving that marketing.

## Third party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## Opting out

You can ask us to stop sending you marketing messages at any time by checking the boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at [info@theleansixsigmacompany.co.uk](mailto:info@theleansixsigmacompany.co.uk) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information on how you can disable cookies please visit [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies)

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [www.theleansixsigmacompany.co.uk/cookies/](http://www.theleansixsigmacompany.co.uk/cookies/).

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in paragraph 4 above:

- Internal third parties such as group companies;
- External third parties such as :

- service providers acting as processors who provide IT and system administration services such as the University of Bedfordshire;
- professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK and the Netherlands;
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require the processing of activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Third-party links: This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

We share your personal data within the The Lean Six Sigma Company Group (TLSSC Group). This will involve transferring your data outside the UK to the Netherlands in which country the main offices of TLSSC Group are located.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us at [info@theleansixsigmacompany.co.uk](mailto:info@theleansixsigmacompany.co.uk) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in

place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, such as a right to access your personal data or to ask for a correction of your personal data by way of example. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

### Contact details

Our full details are:

Full name of legal entity: TLSSC Limited trading as The Learn Six Sigma Company UK

Name or title of data privacy manager: Geert Brokking

Email address: [geert@theleansixsigmacompany.com](mailto:geert@theleansixsigmacompany.com)

Postal address: 35 Ballards Lane, London N3 1XW

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

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