

MAC's PRIVACY POLICY

Market Abuse Centre (MAC) has developed a privacy policy which meets the EU regulation GDPR. MAC's Privacy Policy sets out how MAC uses and protects any information provided by its clientele and/or learners, either by visiting our website (www.MarketAbuseCentre.com), or by off-taking our learning services.

MAC is committed to ensure that the privacy of its clientele and learners is protected. Should MAC ask client/learner to provide certain information by which one can be identified, then one can be assured that it will only be used in accordance with this Privacy Policy, unless explicitly stated otherwise.

MAC may change this policy from time to time by updating this document; periodic reviews by clientele/learners are therefore suggested. The latest version of this Privacy Policy will be posted on MAC's website. If MAC materially changes the ways in which it uses or shares personal information previously collected from clientele/learners through our services, MAC will notify learners through our services, by email, or other communication.

MAC collects personal data from the moment one leaves personal details on MAC's website (www.MarketAbuseCentre.com), one registers for the off-take of an MAC learning service, or one registers in another way (e.g. via telephone, e-mail or a form (subscription, contact details)).

THE INFORMATION MAC COLLECTS

MAC collects the following data:

- **Information from learners**
 - (Account) registration: when one registers for an educational programme (online or onsite) (e.g. learning platform), MAC asks for one's personal contact information, namely full name and email address (e.g. required for account creation and maintenance).
 - MAC also records the programmes one has followed and the corresponding progress/activity (this is used to verify whether someone has been certified, as well as for reporting client about proceedings).
 - Next, MAC records correspondence and forms, such as emails, list of course participants/attendees, evaluation forms, contact forms, exam (answers, results) and certificates.
 - MAC collects messages, images, video, audio, and files submitted by learners to its company app (for mobile devices), and the related communities (chatrooms).
- **Information from clients**
 - From clients MAC collects the following information: company name, VAT number, address, contact person, email address contact person, telephone number, staff (learner) information.
 - MAC also records correspondence and forms, such as emails, offers, orders, invoices, contact forms, learner lists, reports (activity / progress learners).
- **Payment Information**
 - When client adds its financial account information to one's account, that information is directed to MAC's third-party payment processor. MAC does not store client financial account information in its systems.
 - MAC stores client/learner data depending on the applicable statutory retention periods, one's privacy rights and the legitimate interest in the context of MAC's

business operations and services. In the meantime MAC will keep the provided information until one requires MAC to delete it.

▪ Cookies

Only third-party cookies are used on MAC's website, to improve the service, i.e. Google Analytics and Youtube video player. These functions use anonymised cookies: more technical details about their behaviour are in the following description.

Google Analytics

- Our website uses a cookie from the US company Google as part of its Google Analytics service. We use this service in order to monitor anonymous how our visitors use our website. Google may provide this information to third parties if Google is legally required to do so or if the third party is responsible for processing the information on the behalf of Google. MAC has no influence on such provision. We have not given permission to Google to use the analytics information provided for any other Google services. The information collected by Google is made as anonymous as possible. The information is stored on Google servers in the United States. Google adheres to the Safe Harbor principles and has joined the American Department of Commerce's Safe Harbor programme. Among other issues, this guarantees a sufficient level of protection for the processing of any personal data present.
- More information: <https://policies.google.com/privacy>
- To opt-out of being tracked by Google Analytics across all websites: <https://tools.google.com/dlpage/gaoptout>

gtag.js and analytics.js set the following cookies:

Cookie Name	Expiration Time	Description
_ga	2 years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gid	24 hours	Registers a unique ID that is used to generate statistical data on how the visitor uses the website in an anonymous form.
_gat	1 minute	Used by Google Analytics to throttle request rate to limit the collection of data on high traffic sites.

Youtube

- On our website we embed Youtube video's from our official Youtube channel. The Youtube videos have privacy-enhanced mode enabled. This mode may only set cookies once one click on the Youtube video player. Youtube will not store personally-identifiable cookie information. As cookies are set by Youtube, we have no direct control over this usage.
- More information: [Youtube's embedding videos information page](#) and [Youtube's privacy policy](#)

DATA PROTECTION RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

If one is a resident of the EEA, one has the following data protection rights:

- If one wishes to access, correct, update, or request deletion of one's personal information, one can do so at any time by emailing MAC via MAC@MarketAbuseCentre.com.
- In addition, one can object to the processing of personal information, ask MAC to restrict the processing of one's personal information, or request portability of one's personal information.
One can do so at any time by emailing MAC via MAC@MarketAbuseCentre.com.
- One has the right to opt-out of marketing communications which MAC emails at any time. One can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails. To opt-out of other forms of marketing, one is advised to contact MAC via MAC@MarketAbuseCentre.com.
- Similarly, if MAC has collected and processed one's personal information with one's consent, then one can withdraw this consent at any time. Withdrawing this consent will not affect the lawfulness of any processing MAC conducted prior to the withdrawal, nor will it affect the processing of one's personal information conducted in reliance on lawful processing grounds other than consent.
- One has the right to complain to a data protection authority about MAC's data collection and use of personal information. For more information, it is advised to contact the relevant local data protection authority.

MAC responds to all requests it receives from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Upon such a desire, one is expected to send an email to MAC@MarketAbuseCentre.com.

HOW MAC USES INFORMATION

MAC requires personal data specifically to certify learners upon passing an exam (or providing a proof of participation upon request, after having attended a classroom training without examination).

MAC requires personal data in general for the following reasons:

- Internal record keeping;
- Use the information to improve products, services and communication;
- Prevent fraud;
- Develop new products, services, features, and functionality;
- Communicate with clientele/learners to provide them with updates and other information relating to MAC's services, as well as for marketing and promotional purposes;
- Send messages and push notifications;
- Informing employer (MAC client) about the progress of their staff (MAC's learners).
- Display content submitted by the Learner in the company app (for mobile devices) to other Learners in the related communities (chatrooms).

MAC will not sell or distribute personal data to third parties unless it has one's written permission or is required to do so by law.

SUBCONTRACTOR

MAC has stored her data with subcontractors (data storage processors, salary processor). In these cases, MAC has entered a processor's agreement with the relevant subcontractors. In accordance with the GDPR, these subcontractors have also taken the necessary legal measures to prevent security incidents and data leaks. In the exceptional case of a security breach and / or data breach, MAC will act in accordance with the GDPR.

However, MAC may share your personal data with other MAC entities, its clients, its subcontractors (e.g. data storage processors) that provide services on behalf of MAC that are relevant to the processing process and in cases in which MAC is legally obliged to do so.

If one like to receive more information about MAC's subcontractors, then please don't hesitate to contact MAC via MAC@MarketAbuseCentre.com.

THIRD-PARTY SERVICES

One may access other third-party services through the services, for example by clicking on links to those third-party services from within the services (for example payment transfers). MAC is not responsible for the privacy policies and/or practices of these third-party services, and it encourages learners/clients to carefully review their privacy policies.

SECURITY

MAC is committed to protecting personal information. To do so, it employs security measures designed to protect information from unauthorized access, use, or disclosure. The measures MAC uses are designed to provide a level of security appropriate to the risk of processing one's personal information. However, it must be noted that the Internet cannot be guaranteed to be 100% secure.

ACCEPTANCE

Upon provision of personal data to MAC, one accepts MAC's Privacy Policy.

CONTACT

If one has any questions or concerns about this Privacy Policy, please feel free to email MAC at MAC@MarketAbuseCentre.com.