

Privacy Notice

Introduction

Welcome to the Strategic Results Management Ltd. Privacy Notice.

Strategic Results Management Ltd, trading as “Discovering”, 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.

Please use the Glossary to understand the meaning of some of the terms used in this Privacy Notice.

1 Important information and who we are

1.1 Purpose of this Privacy Notice

- (a) This Privacy Notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website as part of our Online Application Process, by signing up for our newsletter or other marketing material, by submitting a query or by using other online services;
- (b) This website is not intended for consumers.
- (c) It is important that you read this Privacy Notice together with any other Privacy Notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

1.2 Controller

- (a) This Privacy Notice is issued on behalf of Strategic Results Management Ltd, trading as “Discovering”, having its registered office at 110 Amiens Street, Dublin, Ireland D01 F6N2. Our company registration number is 221367. Strategic Results Management Ltd, trading as “Discovering”, is the controller for the purposes of this Privacy Notice and responsible for this website.
- (b) If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact info@discovering.ie.
 - (A) You have the right to make a complaint at any time to the Office of the Data Protection Commission (“ODPC”), the Irish supervisory authority for data protection issues at info@dataprotection.ie. We would,

however, appreciate the chance to deal with your concerns before you approach the ODPC so please contact us in the first instance.

1.3 **Changes to the Privacy Notice and your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.4 **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.

2 **The data we collect about you**

2.1 **Types of Data**

- (a) 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).
- (b) We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - (i) **Identity Data** includes first name, last name, username or similar identifier, title and date of birth.
 - (ii) **Contact Data** includes billing address, email address and telephone numbers.
 - (iii) **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
 - (iv) **Profile Data** includes your username and password, service purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - (v) **Usage Data** includes information about how you use our website.
 - (vi) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (c) 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).
- (d) You are subject to the Privacy Policy of any products and services utilised by the user provided by us as part of the facilitation of programs and our services. We recommend that you read all Privacy Policy's for the products and services we use. If you have any questions on the products and services we use, or would like further information on this, please contact info@discovering.ie

2.2 **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 and as a result, your application may be cancelled until further essential information is provided.

3 **How is your personal data collected?**

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

3.1 **Direct interactions.** You may give us your Identity, Contact and Financial Data filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:

- (a) create an account on our website or with our facilitators;
- (b) engage in the Online Application Process;
- (c) subscribe to our publications;
- (d) request marketing material to be sent to you;
- (e) enter a promotion or survey;
- (f) give us some feedback; or
- (g) submit a query through the Contact form.

3.2 **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. Please see our cookie policy for further details.

4 **How we use your personal data**

4.1 **Lawful basis**

- (a) 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:
 - (i) we need to perform the contract we are about to enter into or have entered into with you;
 - (ii) it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
 - (iii) where we need to comply with a legal or regulatory obligation.
- (b) Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at info@discovering.ie

4.2 Purposes for which we will use your personal data

- (a) We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at info@discovering.ie if you need details about the specific legal ground we are relying on to process your personal data.

4.3 General marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms set out in paragraphs 4.4 – 4.7.

4.4 Marketing Communications from us

- (a) We may use your Identity, Contact and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).
- (b) You will receive marketing communications from us if you have requested information from us, received a product or service from us, or if you provided us with your details and have not opted out of receiving that marketing.

4.5 Opting out

- (a) You can ask us or previously authorised third parties to stop sending you marketing messages at any time by contacting us at info@discovering.ie.
- (b) Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase of a service.

4.6 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access 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 our Cookie Policy.

4.7 Change of purpose

- (a) 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at info@discovering.ie.
- (b) 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.
- (c) 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.

5 Disclosures of your personal data

- 5.1 We may have to share your personal data with:

- (a) the parties set out below for the purposes set out in the table in paragraph 4 above:
 - (i) Internal Third Parties as set out in the Glossary;
 - (ii) External Third Parties as set out in the Glossary;
- (b) third parties to whom we 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 or newly acquired businesses may use your personal data in the same way as set out in this Privacy Notice.

5.2 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.

5.3 We do not share your data with any of our affiliated partners, program providers or any other products and services that we use as part of our service to you. In cases where we facilitate your use of a product or service, you are subject to the privacy policy and terms of use of that service provider. Any contract facilitated by us is between you and the product/service provider and thus any personal data or information you provide is held by that provider. We are not liable for the use of this data for any purposes and we do not collect or hold this data.

5.4 Any products/services provided by Inscape Publishing LLC are subject to the Privacy Policy and Terms of Use of Wiley Inc. You can read their privacy policy [here](#). If you would like further information on the products and services we use, please contact info@discovering.ie.

6 Data security

6.1 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.

6.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority or other regulator of a breach where we are legally required to do so.

7 Data retention

7.1 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.

7.2 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.

7.3 By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six years after they cease being customers for tax and other legal purposes.

7.4 In some circumstances you can ask us to delete your data: see below for further information.

8 Your legal rights

8.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Specifically, you may:

- (a) **Request access:** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) **Request correction:** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) **Request erasure:** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **Object to processing:** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have a compelling legitimate ground to process your information which overrides your rights and freedoms.
- (e) **Request restriction of processing:** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) **Request the transfer:** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) **Withdraw consent at any time:** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain offerings to you. We will advise you if this is the case at the time you withdraw your consent.

8.2 If you wish to exercise any of the rights set out above, please contact us at info@discovering.ie.

- 8.3 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.

9 Glossary

9.1 Lawful Basis

- (a) **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best offering and the best and most secure experience; we make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests; we do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law); you can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at info@discovering.ie.
- (b) **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- (c) **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

9.2 Third Parties

- (a) **External Third Parties**
- (i) service providers who provide products and services to you, facilitated by us, and to which you are subject to their own Privacy Policy and Terms of Use: Wiley.
- (ii) professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services; and
- (iii) the Revenue Commissioners in Ireland, regulators and other authorities acting as processors or joint controllers based in Ireland who require reporting of processing activities in certain circumstances.

10 Changes to Privacy Policy

We reserve the right to change our Privacy Policy at any time. If we make changes, we will post them and will indicate on this page the policy's new effective date. Please check this page from time to time to take notice of any changes we make, as they are binding on you.

Effective Date 21st June 2016