

TRAINING AND WEBINAR PRIVACY NOTICE

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1. Introduction

- 1.1 BDO IT Consulting Ltd (hereinafter referred to as “BDO”, “we”, “us”, or “our”) is committed to safeguarding the privacy of our training/webinar participants.
- 1.2 This Training/Webinar Privacy Notice informs you how we, **BDO IT Consulting Ltd** (hereafter “**BDO ITC**”, “**we**”, “**us**”), collect and use your personal data during our different processing in accordance with data protection laws, including the Data Protection Act 2017 (hereafter referred to as the “**DPA**”) and the European Union General Data Protection Regulation 2016 (hereafter referred to as the “**GDPR**”) where applicable.

2. Personal data we may collect about you

- 2.1 The type of personal data we collect, and process will depend on the purpose for which it is collected. We will only collect and process data that we need for that purpose.
- 2.2 We may collect your personal data in the following ways:
- (a) When you give it to us **directly** for e.g. when you enrol in our training/webinar when you fill in Google, Microsoft or Zoom registration forms, when you email us or contact us via phone.
 - (b) When it is available **publicly** for e.g. depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as LinkedIn).
- 2.3 The types of personal data that are collected and processed may include:

Categories of Personal Data	Details
Contact details	First name, surname, physical address, email address, office phone, cell phone.
Identification details	National Identity Card
Individual details	Gender (male/female), age, employment details

3. Purpose for using your personal data

- 3.1 **BDO ITC** will only use your personal data for the purposes for which it was collected or agreed with you. We will not use your personal data for any automated individual decision making which will have a significant impact on you.

3.2 We have set out below the different purposes for processing your personal data:

- For conducting trainings, webinars, including sending email notifications to you when you register for our training/webinar and managing our relationship with you;
- For processing feedback forms such as satisfaction surveys, and for quality assurance;
- For maintaining back-ups of our databases;
- For replying to any requests, complaints, comments, or enquiries you submit to us regarding our training/webinar;
- For record-keeping;
- For confirming and verifying your identity when you request to access, rectify, restrict, or delete the information we hold on you;
- For marketing our services which may be of interest to you, including other training and webinars.

3.3 In addition to the above-mentioned specific purposes for which we may process your personal data, we may also process any of your personal data where such processing is necessary for compliance with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

4. Legal basis of processing personal data

4.1 **BDO ITC** processes your personal data based on one or more of the following legal bases:

- **Contractual Necessity:** Processing is necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract.
- **Legal Obligations:** Processing is necessary to comply with our legal obligations.
- **Legitimate interests:** Processing is necessary for our legitimate interests or the legitimate interests of a third party provided that such interests are not overridden by your rights and interests.
- **Consent:** Processing is based on your explicit consent which you can withdraw at any time.

4.2 **BDO ITC** adheres to provisions stipulated in the **DPA** and **GDPR** and processes special categories of personal data on the following grounds, where:

- the processing is based on your consent;
- the processing is necessary for the establishment, exercise, or defence of a legal claim;
- the purpose of carrying out the obligations and exercising specific rights of the controller or of the data subject; or

- protecting the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.

5. Disclosure of personal data

- 5.1 In general, we do not share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so.
- 5.2 **BDO** may share your personal data with its Affiliates (*Affiliates may include companies within the same group, our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us*) for the purposes listed above. When we share your data, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data.
- 5.3 We may also be required to disclose your personal data to other third parties such as lawyers, bankers, consultants, auditors as well as public and government authorities, as required by applicable laws and regulations, for national security and/or law enforcement purposes.
- 5.4 In the event we share personal data with third parties, we will require our affiliates, service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed.

6. Security of your personal data

- 6.1 We have put in place appropriate security measures to prevent your personal data from being subject to any accidental or unlawful destruction, loss, alteration, and any unauthorised disclosure or access.
- 6.2 We have also put in place procedures to deal with any suspected data security breach and will notify you and the Data Protection Office of a suspected breach where we are legally required to do so.

7. Your data protection rights

- 7.1 Under the **GDPR** and the **DPA**, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.
 - **Right of Access:** You have the right to request access to the personal data we hold about you. This includes the right to obtain confirmation of whether we process your personal data and to receive a copy of that information.
 - **Right to Rectification:** If you believe that the personal data, we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.

- **Right to Erasure:** In certain circumstances, you may have the right to request the erasure of your personal data. This includes situations where your personal information is no longer necessary for the purposes for which it was collected, or you withdraw your consent and there is no other legal basis for processing.
- **Right to Restriction of Processing:** You have the right to request the restriction of processing of your personal data under certain conditions. This means we will temporarily suspend the processing of your personal data, such as when you contest its accuracy or when you object to the processing.
- **Right to Data Portability:** You may have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller.
- **Right to Object:** You have the right to object to the processing of your personal data for certain reasons, such as direct marketing or legitimate interests. If you exercise this right, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.
- **Right to Withdraw Consent:** If we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

Note:

- (a) If you wish to exercise any of the rights set out above, please contact our **DPO** (refer to Section 12.1).
- (b) We try to respond to all requests within one month. However, it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

8. Retention of your personal data

- 8.1 Where we collect and or process your personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose unless we have to keep it for legitimate business or legal reasons. To the extent permitted or required by law, we may delete your personal data at any time. The maximum time we will keep your personal data is 5 years.

9. Your responsibilities

- 9.1 You are responsible for the data you provide or make available to us, and you must ensure it is honest, truthful, accurate and not misleading in any way. You must ensure that the data provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party, does not contain malicious code and is not otherwise legally actionable.

10. International transfers

- 10.1 We have developed global data security practices designed to ensure that your personal data is appropriately protected. Your personal data may be transferred, accessed, and stored globally as necessary for the uses and disclosures stated above in accordance with this notice.
- 10.2 Where such international transfer is to a country that provides a lower level of protection, we take steps to ensure the security and confidentiality of your personal information in accordance with applicable data protection laws, including using the European Commission's approved Standard Contractual Clauses, and for transfers to other BDO Member Firms, we use the BDO Global Privacy Policy, namely BDO's Binding Corporate Rules for Controllers and Processors. If you wish to see a copy of the relevant mechanism that we use to transfer your personal information, please contact the **DPO** as per section 12.1.

11. Complaints

- 11.1 If you have any complaints regarding our compliance with this notice, you should contact the **Data Protection Officer** at:
- By email, at dpoitc@bdo.mu; or
By post, to 10, Frère Felix de Valois St, Port Louis, Mauritius.
- 11.2 We will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of your personal data in accordance with this notice.
- 11.3 If you believe that we have not handled your request properly, then you have the right to complain to the Data Protection Office in Mauritius.

12. General

- 12.1 We may update this notice from time to time to reflect best practices in data management, security, and control and to ensure compliance with any changes or amendments made to the DPA and any laws or regulations thereof. The latest version is available on BDO Mauritius's website.