



**Privacy and Cookie Policy**  
**GCP Central B.V.**  
**for myGCP and GCP Central websites**  
(version 3.0, last update on July 22, 2019)



This Privacy Policy explains how and for what purpose we use your personal information collected through our websites myGCP and gcpcentral.com. Please read this Policy very carefully. By using the site and submitting your Personal data, you agree to the terms of this Privacy Policy.

## 1. The Information that we collect and process

Some of our website's functionality can be used without submission of any of your personal information, however, for features or services related to the training, submission of personal information is required. We gather the following information about users through the site:

**Non-Personal Information.** If you do not use these specific features or services on the website, then the only information we collect will be "Non-Personal Information" (i.e., information that cannot be used to identify you). Non-Personal Information includes information such as the web pages that you have viewed. When users come to our website, we may track, collect and aggregate Non-Personal Information indicating, among other things, which pages of our website were visited, the order in which they were visited, when they were visited, and which hyperlinks were "clicked." We also collect information from the URLs from which you linked to our website. Collecting such information may involve logging the IP address, operating system and browser software used by each user of the website. Although such information is not Personally Identifiable Information, we may be able to determine from an IP address a user's Internet Service Provider and the geographic location of his or her point of connectivity.

**Personally Identifiable Information.** To access certain features and benefits on our website, you may need to submit "Personally Identifiable Information" (i.e., information that can be used to identify you). Personally Identifiable Information can include information such as your name and email address, among other things. You are responsible for ensuring the accuracy of the Personally Identifiable Information you submit to GCP Central B.V. Inaccurate information may affect your ability to use the website, the information you will receive when using the website, and our ability to contact you. For example, your email address should be kept current because that is one of the primary manners in which we communicate with you.

We collect Personally Identifiable Information that you will provide to us when you sign-up for email updates or our training, participate in our public forums, send us email messages, and/or participate in our training or other services on our website.

**Updates:** GCP Central B.V. may offer you the ability to receive training updates either via email or by posting on the website only accessible to registered users. When registration is complete you are automatically subscribed to these services, you may be required to provide us with Personally Identifiable Information such as your name and email address.

**Participation in trainings:** From time to time, GCP Central B.V., may offer you the opportunity to participate in a training on or through the website. If you desire to participate in a training, you will be asked to provide us with certain information necessary to conduct such a training. This information may include, among other things, your name and email address.

**Communications with GCP Central:** We may receive Personally Identifiable Information when you send us an email message or otherwise contact us.

**Third Party Websites:** We may receive Personally Identifiable Information when you access or log-in to a third-party website, e.g. LinkedIn, Facebook and Twitter, and access our websites. This may include the text and/or images of your Personally Identifiable Information available from the third-party website. We may collect user data for conversion tracking.

**Newsletters:** You may receive Personally and serving ads targeted to the users' interests. You can opt-out of interest-based advertising through methods that the third-party websites may specify. GCP Central B.V. also uses the Google AdWords remarketing service to advertise on third party websites to previous visitors to our website. Third-party vendors, use cookies to serve ads based on someone's past visits to the GCP Central B.V. website. Any data collected will be used in accordance with our own Privacy Policy and Google's Privacy Policy.

**Cookies and web beacons.** We also use or may use cookies and web beacons to help us determine and identify repeat visitors, the type of content and websites to which a user of our website links, the length of time each user spends at any area of our website and the specific functionalities that users choose to use. Essentially, cookies are a User's identification card for the GCP Central B.V. servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our website and related functionalities. Cookies and web beacons allow GCP Central B.V. to serve you better and more efficiently and to personalize your experience at our website. Cookies and web beacons are not used to retain Personally Identifiable Information. From time to time we may also use additional typical methods of collecting data.

You should be able to control how and whether cookies will be accepted by your web browser. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. If you reject our cookies, many functions and conveniences of the website will not work properly.



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## 2. How and why we use the information

Please take some time to familiarize yourself with the different ways GCP Central B.V. uses the information that we gather:

**Non-Personal Information:** We use Non-Personal Information in aggregate form to build higher quality, more useful services by performing, but not limited to, statistical analyses of the collective characteristics, behavior of our users, and by measuring demographics and interests regarding specific areas of our website. We may also use it for other business or scientific purposes.

**Personally Identifiable Information:** We may use the Personally Identifiable Information that you provide for:

- \* Acceptance of your order, and financial/customer administration: to provide you with the specific training and/or services you select;
- \* Relationship management, customer service and to respond to your questions;
- \* Monitoring training compliance in management dashboards and reports;
- \* Product and service development and research;
- \* Determination of the (general) commercial strategy;
- \* Training updates or maintenance messages, and to send you notifications of content updates;
- \* Registration of Continuing Education and Training points at third party websites (such as PE-online)
- \* To inform you via e-mail about interesting news related to scientific research, training offered by GCP Central, events, our products, promotions and other similar products or services of GCP CENTRAL.
- \* The detection of (attempted) unlawful and / or criminal acts against GCP CENTRAL, its customers and employees, as well as for participation in warning systems used to prevent fraud and to control credit risks;

In addition to the other uses set forth in this Privacy Policy, we may disclose and otherwise use Personally Identifiable Information as described below.

**Updates:** We use Personally Identifiable Information collected when you sign-up for our various email or update services to send you the messages regarding the website or an online training. We may also archive this information and/or use it for future communications with you.

**Participation in Courses:** We use the Personally Identifiable Information that we collect from you when you participate in a training through the website for processing purposes, including but not limited to tracking attendance, progress and completion of a training.

We may also share your Personally Identifiable Information and your performance in each training with the trainer(s) who is teaching the training or other individuals designated by the trainer(s) to assist with the creation, modification or operation of the training. Also, we may archive this information and/or use it for future communications with you.

**Management dashboards/reports:** We use the Personally Identifiable Information that we collect from you when you participate in a training through the website for management information purposes, including but not limited to tracking attendance, progress and completion of a training. We may also share your Personally Identifiable Information and your performance in each training with line managers, contact persons and other responsible persons in your organization such as, but not limited to, research/BROK coordinators for them to fulfill their responsibilities within the organization.

**Communications with GCP Central B.V.:** When you send us an email message or otherwise contact us, we may use the information provided by you to respond to your communication and/or as described in this Privacy Policy. We may also archive this information and/or use it for future communications with you.

GCP Central B.V. does not sell email addresses or other general information that you provide in the registration process to other parties. GCP Central B.V. may use third parties to process data, including Personally Identifiable Information that GCP Central B.V. obtains via its website. GCP Central B.V. only provides data to third parties if this is required for the execution of its agreement with you, or to comply with a legal obligation. With companies that process your Personally Identifiable Information on our behalf, we conclude a so-called processor agreement to ensure the same level of security and confidentiality of your Personally Identifiable Information.

GCP Central B.V. processes your Personally Identifiable Information based on the following legal principles:

- as a data subject you have given your (explicit if necessary) consent for the processing;
- as a data subject you have the right to change or withdraw your consent at any time;
- processing the Personally Identifiable Information is required for the execution of a contract that you are party to, or for complying with a legal obligation.

We do not store your Personally Identifiable Information any longer than strictly necessary to achieve said goals. It is possible that



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the information is shared internally. Our employees are, like us, obliged to respect the confidentiality of your Personally Identifiable Information.

### 3. What do you consent to by using our website?

Please understand that by submitting any Personally Identifiable Information to us, you will consent and agree that we may collect, process, use and disclose such Personally Identifiable Information in accordance with this Privacy Policy, the terms of use under the Agreement, and as permitted or required by Dutch Law

You provide consent to GCP Central B.V. to process your personal information for the training and to transfer your personal data to third parties that play a crucial role in the educational process, like organizations that organize the face-to-face part of the training (in the event of the Blended training), accreditation authorities, examination authorities, professional registers (for the registration of you having successfully completed the training).

If you do not agree with these terms, then please do not provide any Personally Identifiable Information to us. If you will refuse or withdraw your consent or if you choose not to provide us with any required Personally Identifiable Information, we may not be able to provide you with the services that can be offered on our website.

### 4. External Links

For your convenience, we may provide links to websites operated by organizations other than GCP Central B.V. ("Third Party Websites") that we believe may be of interest to you. We do not disclose your Personally Identifiable Information to these Third-Party websites without obtaining your consent. We do not endorse and are not responsible for the privacy practices of these Third-Party websites. If you choose to click on a link to one of these Third-Party websites, you should review the privacy policy posted on the other website to understand how that Third-Party website collects and uses your Personally Identifiable Information.

### 5. Confidentiality & Security of Personally Identifiable Information

We consider the confidentiality and security of your information to be of the utmost importance. We will use commercially reasonable efforts to keep your Personally Identifiable Information private and will not share it with third parties, except as otherwise provided in this Privacy Policy, or unless we have good faith belief that such disclosure is necessary in special cases, such as a physical threat to you or others. We do not guarantee the security of Personally Identifiable Information, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted.

GCP Central B.V. may disclose your personally identifiable information if it believes in good faith that it is required to do so to comply with applicable law, a subpoena or other legal process. GCP Central B.V. may also disclose this information if it has reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating this Agreement or to protect the safety of users and the public. If you have the impression that your Personally Identifiable Information is not protected properly or there are indications of misuse, please contact us. Please find our contact details below.

### 6. Changing Our Privacy Policy

GCP Central B.V. reserves the right to review and change the Private Policy from time to time. Any change, update, or modification will be effective immediately upon posting on our website. We will notify you of any material change to this Privacy Policy by posting a notice on our websites for a reasonable period following such update, and by changing the effective date (located at the bottom of this page). Be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

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