

Privacy Policy

1. General

1.1 This privacy policy describes how Promote International AB, company registration no. 556573-2962, (“Promote”, “we” or “us”) processes personal data.

1.2 Promote provides a web-based platform for training initiatives, consultancy services and courses about training design (the “Service”).

1.3 The service is provided to Promote’s customers (“Customers”). When providing the service, Promote will be processing personal data. Unless otherwise specified, Promote is the data controller for the processing of personal data which takes place in accordance with this Privacy Policy.

1.4 Promote also processes personal data as data processor for customers who use the Service. In these cases, the customer is the data controller for this processing. In this privacy policy, it is clearly stated if Promote performs processing as a data processor. For questions relating to the processing of personal data performed by Promote as data processor, please contact us or the Customer who is the data controller for the processing.

1.5 Promote will only collect and process personal data in accordance with the Data Protection Regulation (EU 2016/679). This privacy policy also describes a data subject’s rights and opportunities to e.g. request records.

1.6 The latest version of the privacy policy can be found on Promote’s website. Collection of personal data

2.1 Promote processes the following data as data controller:

(a) Personal data relating to those of a Customer’s users who use the service:

- name
- company name
- e-mail
- phone number
- title
- profile image
- links to social media
- self presentations
- comments

(b) If a person at a Customer contacts Promote by e-mail, telephone, or through the Service, Promote collects name, phone number and e-mail address, depending on the contact form, as well as other personal information necessary to assist the person contacting Promote.

(c) Personal data relating to contacts at potential customers:

- name
- e-mail
- phone number
- title

(d) Promote International is the accrediting body of the Brinkerhoff Certification for High Performance Learning Journeys certification program. To authenticate achievements, Promote International will keep a permanent record of certification along with personal details (name, email address, organization).

(e) All live on-line sessions of the Brinkerhoff Certification for High Performance Learning Journeys will be recorded. Recordings will be published on the corresponding Promote program. The recordings will be deleted after a maximum of two (2) years.

2.2 During visits to the Promote Website or use of the Service, Promote also collects additional data, namely:

- (a) traffic data, location data, weblogs and other communication data as well as IP address, device type, operating system and browser used by the visitor
- (b) the personal information which visitors themselves leave via live chat

3. How Promote processes personal data

3.1 Promote processes personal data to provide and improve the Service, and fulfil our commitments to you. Promote processes personal data for the following purposes and based on the following legal grounds.

Purpose of the processing	Legal basis for the processing	Categories of personal data	Storage period
In order to provide the Service.	In order to fulfil Promote’s contractual obligations.	The categories listed in section:2.1 (a).	Three years from when a customer stops using the service.
To be able to inform about Promote and the Service.	Other legitimate interests.	The categories listed in section:2.1 (a) and 2.2 (b).	1 year from when the potential customer was contacted, unless the recipient does not object to further communication.
To ensure that content is presented to users of the Service effectively, and to improve the Service.	Other legitimate interests.	The categories listed in section2.2.	1 year from user session.
To issue invoices and process payments for the use of the Service.	In order to fulfil Promote’s contractual obligations and comply with applicable law.	The categories listed in section:2.1 (a).	Until the claim is paid, then for up to seven years in accordance with Swedish accounting rules.
To comply with applicable legislation	In order to comply with applicable legislation.	The categories listed in section 2.1 (a) + (b)	In accordance with the law (for seven years, according

such as the Act on Accounting.			to Swedish accounting rules).
To authenticate Brinkerhoff Certification for High Performance Learning Journeys certification	Other legitimate interests.	The categories listed in section 2.1 (d)	Until user revokes the certification.

4. Disclosure of personal data

4.1 Promote may transfer or share data with other parties processing data on Promote’s behalf, in order for Promote to be able to provide the Service. Promote uses the following subcontractors or categories of subcontractors.

Subcontractor (name of service)	Country/region where the service is provided	Mechanism for transfer to third countries	Type of service
Linode	Germany	Not transferred	Hosting service server
Amazon	Germany	Not transferred	Backup hosting
Freshworks	EU	Standard Contractual Clauses (SCC)	CRM, digital marketing system
Visma SPCS AB	EU	Not transferred	Invoicing system
Wistia Incorporated	USA	Standard Contractual Clauses (SCC)	Video hosting service

4.2 Promote only cooperates with companies that process personal data within the EU/EEA or companies that maintain the same level of protection as in the EU/EEA.

4.3 Promote discloses necessary personal data to authorities such as the police, tax authorities or other agencies if Promote is required to do so by law. An example of legal disclosure is disclosure with the aim of combatting money laundering and financing terrorism.

5. Processing of personal data as a data processor

5.1 Promote processes personal data about a Customer’s employees. Such processing is carried out by Promote as a data processor for the respective Customer, who is the data controller. Promote processes personal data about a customer’s employees in accordance with the data controlling Customer’s instructions, as well as the applicable data processing agreement between Promote and the data controlling Customer.

5.2 For more information about which personal data Promote processes as data processor for a Customer, we recommend that you read the relevant Customer’s information about their handling of personal data, or contact the data controlling Customer.

6. Rights of data subjects

6.1 Right to records. Once per calendar year and at no cost to you, you have the right to receive records of your personal data which we store and process. Your request must be submitted to us in writing and bear your signature.

6.2 Right of rectification. You have the right to correct inaccurate or incomplete information about yourself. You can correct inaccurate or incomplete information through the Service. You can also contact us if you need help with this.

6.3 Data portability. For personal information you have provided to us, you have the right to request a transfer to another provider. Contact us if you need help with this.

6.4 Deactivating and deleting user account (the right to be forgotten). You have the right to object to our processing of your personal data. The consequence of this may be that you can no longer use the Service. If you want to delete your account, please contact us using the contact details below.

6.5 Marketing communications. You can always opt out of receiving marketing communications from Promote by clicking “unsubscribe” in e-mail and SMS communications sent by Promote. Data subjects are always welcome to contact Promote for help to opt out of Promote communications.

7. Security

7.1 Security is important to Promote, and we take adequate technical and organisational security measures to ensure that personal data cannot be misused, lost or accessed by unauthorised persons in connection with Promote’s processing of personal data in accordance with this privacy policy.

8. Changes to this data protection policy

8.1 Promote reserves the right to make changes to this privacy policy.

8.2 Any changes to this privacy policy will be published on our website. Please visit our website regularly to stay informed of any changes.

9. Contact

9.1 For more information about Promote’s personal data management, or if you have questions, you are welcome to contact Promote on:

Promote International AB
info@promoteint.com
Tel: +46 8-58638800

9.2 If you are unhappy with how we process your personal information, you can contact the Swedish Data Protection Agency, +46 8 657 61 00, datainspektionen@datainspektion.se, Box 8114, 104 20 Stockholm.

10. Effective date

This privacy policy applies from 2018-05-25 and until replaced by an updated version.