



PRIVACY NOTICE TO TRAINING PARTICIPANTS

www.dietsmann.com

SMART MAINTENANCE SOLUTIONS FOR CONTINUOUS PRODUCTION PLANT


Dietsmann
Maintaining Energy

I. INTRODUCTION

This Privacy Notice explains how Dietsmann Corporate Holdings Ltd. and its subsidiaries (collectively and individually hereinafter: “DIETSMANN”, “we” or “us”) process personal data relating to persons outside DIETSMANN who register for, attend, participate in or otherwise interact with professional training courses organised, delivered, hosted or facilitated by DIETSMANN.

This Privacy Notice applies to external training participants, including employees, representatives or contractors of DIETSMANN clients, suppliers, business partners or other third parties. It describes which personal data DIETSMANN may process, the purposes and legal grounds for processing, how personal data may be shared, how long it may be retained, and the rights available to individuals under applicable data protection laws. This Privacy Notice does not cover the links within the Dietsmann website linking to other websites. Those sites are not governed by this Privacy Notice and, if you have questions about how a site uses your information, you should check that site’s privacy notice. This Privacy Notice may be updated from time to time. The most recent version will be made available on DIETSMANN’s website.

II. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA

DIETSMANN acts as controller of the personal data processed for the organisation, administration and delivery of professional training courses, unless another entity determines the purposes and means of the processing. Where DIETSMANN processes personal data on behalf of another organisation, such as a client or business partner requiring its personnel to attend training, DIETSMANN may act as processor in accordance with the applicable contractual arrangements.

DIETSMANN’s Privacy Team is responsible for overseeing this Privacy Notice and may be contacted as indicated in Section VIII below.

III. ON WHICH LEGAL GROUNDS AND FOR WHAT PURPOSES MAY DIETSMANN PROCESS YOUR PERSONAL DATA

III.1. LEGAL GROUNDS

DIETSMANN processes personal data only where it has a lawful basis to do so. Depending on the circumstances, the relevant legal grounds may include: performance of a contract or taking steps prior to entering into a contract; compliance with legal or regulatory obligations; DIETSMANN’s legitimate interests in organising, delivering, evidencing and improving professional training and maintaining safe and secure training environments; protection of vital interests where necessary; and consent where required, for example for certain optional uses of photographs, video or audio recordings, testimonials or marketing communications.

III.2. PURPOSES

DIETSMANN may process personal data of external training participants for the following purposes: managing registrations and participant identity; communicating practical information before, during and after training; providing access to training premises, online sessions, materials, systems or platforms; delivering training courses and related services; recording attendance, participation, completion, assessment results and certificates; reporting attendance or completion information to the participant's employer, client, sponsor or other organisation where appropriate; ensuring health, safety, security and access control; administering feedback, surveys, complaints or incident reports; maintaining internal records and evidence of compliance; managing trainers, training providers and IT service providers; improving training content and delivery; and complying with applicable legal, regulatory, contractual, audit, insurance or dispute-resolution requirements.

III.3. PERSONAL DATA

The personal data processed may include identification and contact details, such as name, social security number and/or other government-issued identification number, personal/professional email address, telephone number, employer or organisation, job title, department, work location and signature; registration and logistical information, such as course selected, training dates, dietary or accessibility information where voluntarily provided and necessary for the training arrangements; attendance and training records, such as presence, participation, completion status, assessment results, certificates, badges, training history and feedback; communication data, such as emails or messages exchanged with DIETSMANN in relation to the training; technical data, such as user IDs, login information, IP address, device or platform usage data where online tools are used; and, where applicable, photographs, video or audio recordings, transcripts or images captured during training sessions or related events.

DIETSMANN does not intend to collect special categories of personal data from training participants, unless such data is necessary for a specific purpose, such as health, safety, accessibility or emergency arrangements, or where the participant voluntarily provides such information. In such cases, DIETSMANN will process the information only where permitted by applicable law and subject to appropriate safeguards.

IV. PHOTOGRAPHS, RECORDINGS AND ONLINE TRAINING TOOLS

Certain training sessions may be delivered through online platforms or may involve photographs, audio/video recordings, screenshots, transcripts or similar materials. Where a session is recorded or where photographs or recordings may be used beyond the immediate delivery or administration of the training, DIETSMANN will inform participants in advance. Where required by applicable law, DIETSMANN will request consent or provide an appropriate opportunity to object, taking into account the purpose of the recording and the reasonable expectations of participants.

Participants should avoid disclosing unnecessary personal or confidential information during recorded sessions. Recordings, transcripts or related materials will be accessed only by persons who need them for the relevant training, administrative, compliance or evidentiary purpose.

V. WHO HAS ACCESS TO YOUR PERSONAL DATA

V.1 ACCESS TO YOUR PERSONAL DATA WITHIN DIETSMANN

Within DIETSMANN, personal data may be accessed only by authorised personnel who need the information for the purposes described in this Privacy Notice, including training coordinators, trainers, legal, compliance, human resources, health and safety, security, IT, finance and management personnel where relevant.

Personal data may also be shared within the DIETSMANN group where this is necessary for training administration, operational, compliance, reporting, security or recordkeeping purposes. DIETSMANN takes organisational, contractual and legal measures designed to ensure that personal data is processed only for permitted purposes and protected by appropriate safeguards.

V.2. ACCESS TO YOUR PERSONAL DATA BY THIRD PARTIES

DIETSMANN may disclose personal data to authorised third parties where necessary for the purposes described in this Privacy Notice, including external trainers, training providers, learning management system providers, IT and hosting providers, travel or venue providers where relevant, certificate or badge issuers, auditors, insurers, legal or professional advisers, public authorities where required by law, and the participant's employer, client, sponsor or other relevant organisation where attendance, completion, certification or incident information must be reported. DIETSMANN will comply with applicable laws and regulations in disclosing personal data to third parties and commits itself to ensuring that the personal data is adequately protected and is processed solely for the permitted purposes. Where personal data is transferred outside the country in which it was collected, including DIETSMANN will take appropriate measures in accordance with applicable data protection laws, such as relying on adequacy decisions, standard contractual clauses or other lawful transfer mechanisms.

VI. HOW IS YOUR PERSONAL DATA SECURED

DIETSMANN is committed to the protection of your personal data and has taken adequate measures to ensure the confidentiality and security of your personal data. DIETSMANN has implemented appropriate technical, physical and organizational measures to protect personal data from unauthorized or unlawful disclosure, access, loss, damage or alteration.

In the event of a data breach, if personal data has been exposed to risk DIETSMANN will notify the relevant authorities and the relevant individuals, subject to and in accordance with the provisions of applicable data protection laws and regulations.

VII. HOW LONG DOES DIETSMANN RETAIN YOUR PERSONAL DATA

DIETSMANN retains personal data only for as long as necessary for the purposes for which it was collected, unless a longer retention period is permitted or required by applicable law, contractual obligations, audit requirements, insurance requirements or the establishment, exercise or defence of legal claims. Registration and logistical information will generally be retained for the period necessary to manage the training and related administration. Attendance, completion, assessment and certification records may be retained for longer where needed to evidence training, compliance or contractual performance. Photographs, recordings, transcripts and feedback will be retained only for as long as necessary for the specific purpose for which they were collected or produced. Where possible, DIETSMANN may anonymise information so that it can no longer be associated with an identifiable individual.

VIII. YOUR RIGHTS

To exercise your rights or ask questions about the processing of your personal data, please contact DIETSMANN using the contact details below. DIETSMANN may need to verify your identity before responding to certain requests.

Subject to applicable law, you may have the right to request access to your personal data, correction of inaccurate or incomplete personal data, deletion of personal data, restriction of processing, objection to processing, portability of personal data, and withdrawal of consent where processing is based on consent. You may also have the right to lodge a complaint with a competent data protection authority.

Should you have any questions or comments regarding this Privacy Notice or the processing of your personal data, please contact us at privacy@dietsmann.com.