Table of contents

Privacy Notice under the EU GDPR for clients, employees, suppliers and potential interested parties 2
General Data Protection Regulation 2
The Business 2
Privacy Notice 3
  Accepting this Privacy Notice 3
Individuals Rights 4
  Personal Information Collected 5
What we do with the information we gather 7
Data Retention 8
Security Disclosure 8
International Data Transfers 9
Data Erasure 9
  When does the Right to Erasure apply? 9
  When does the Right to Erasure not apply? 9
  Data Deletion 10
Cookies and other tracking technologies 11
Links to other websites 11
Controlling your personal information 11
Changes to our Privacy Policy 12
Privacy Notice under the EU GDPR for clients, consultants, employees, suppliers and potential interested parties

General Data Protection Regulation

The EU General Data Protection Regulation (GDPR) is a significant piece of European privacy legislation, replacing the 1995 EU Data Protection Directive (European Directive 95/46/EC). It aims to support the rights that individuals have on data about themselves which is collected and stored by organisations. It also aims to detect, identify and mitigate against data breaches or leaks for all companies in the EU, as well as enforcing reporting on these issues. This regulation aims to create one uniform policy across the EU, regardless of whether the UK is part of the European Union. Any business that deals with EU nationals and business alongside their data must comply with the legislation.

Art of Work Solutions Ltd aims to comply with the applicable GDPR regulations as a data processor and controller. Working alongside its employees, clients and suppliers it will comply when the GDPR legislation takes effect on 25th May 2018.

Art of Work Solutions Ltd uses Third Party suppliers and software to process, control and manage data. These systems have been audited in line with GDPR commitments and outlined below. In the context of this statement, data subject refers to the person or entity submitting data and can include employees, clients and other individuals or organisations that Art of Work Solutions Ltd works with.

The Business

Art of Work Solutions Ltd are predominantly a management consultancy company who specialise in the provision of services to high risk industries such as Manufacturing, Oil and Gas, Construction and Aviation. Art of Work Solutions Ltd provides a variety of services including assessment of risk, culture profiling, training and educational lectures and management advice. For a full range and up to date list of our services please visit our website.

Art of Work Solutions Ltd advertise events publicly and people submit their information freely. Data collection and processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract. The Contract a data subject enters will entail Art of Work Solutions Ltd Terms and Conditions which is made available to them in both the signed contract and by request. By submitting data, the data subject agrees that this data can be processed and stored. Art of Work Solutions Ltd would obtain consent to process and store personal data including but not limited to; name, email and mobile number. This data is necessary to ensure effective business engagements with Art of Work Solutions Ltd and other
reasons for communication. Art of Work Solutions Ltd reserve the right to contact data subjects who have submitted this data both upon submission and in the future to ensure data is accurate.

Privacy Notice

This privacy policy sets out how Art of Work Solutions Ltd uses and protects any information that you give Art of Work Solutions Ltd when you use our website and transfer data to our employees or consultants.

Art of Work Solutions Ltd is committed to protecting the private information of our employees, clients and suppliers. To ensure that your personal data remains secure we are communicating our privacy policy and guidelines to all Art of Work Solutions Ltd employees and consultants to enforce privacy safeguards within the business.

This Privacy Policy describes our privacy practices regarding the collection, use and worldwide transfer of personal information collected through our website, as well as personal information gathered by Art of Work Solutions Ltd in relation to the procurement of event tickets.

Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement.

Art of Work Solutions Ltd is a subsidiary of Art of Work Pty Ltd and therefore Art of Work Solutions Ltd is not the sole collector of information, however Art of Work Solutions Ltd is committed to protecting the privacy of your personal data collected by them. In this statement we announce our company (and website’s) policies regarding the collection, use and transfer of your personal data, the security methods that Art of Work Solutions Ltd use to protect such data and your rights under the General Data Protection Regulation (GDPR).

By using our website and procuring event tickets, you state your agreement to the terms and conditions set out within this Policy. If the terms set forth within this Privacy Policy are not acceptable for you for any reason, please do not use our website or procure event tickets.

Accepting this Privacy Notice

Art of Work Solutions Ltd will process your personal data in accordance with this Privacy Notice, unless this conflicts with applicable law, whereby applicable law will prevail.

Upon submission of your personal data, you agree that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
Please note this Privacy Notice does not form part of any contract of employment offered to employees and consultants hired by Art of Work Solutions Ltd.

Individuals Rights

Art of Work Solutions Ltd treats all Personal Information in a manner consistent with the requirements of the General Data Protection Regulation (GDPR). Art of Work Solutions Ltd take reasonable steps to ensure personal data is accurate, up to date and complete for the purposes for which it is collected and used. Art of Work Solutions Ltd have measures to ensure that our processing of personal data complies with this Privacy Notice and applicable law.

As a data subject, you have the right to request access to the personal data Art of Work Solutions Ltd have collected about you. This could be for the purpose of reviewing, modifying, or requesting deletion of the data. You also have the right to request a copy of the personal data Art of Work Solutions Ltd have collected about you. This Privacy statement confirms that Art of Work Solutions Ltd ensures that all of our employees, clients and suppliers have the following rights with regards to the data that we hold on them;

1. The right to be informed;
2. The right of access;
3. The right to rectification;
4. The right to erase;
5. The right to restrict processing;
6. The right to data portability;
7. The right to object;
8. Rights in relation to automated decision making and profiling.

If you would like to make a request to access, review, or correct the personal data we have collected about you, or to discuss how we process your personal data, please contact us at serviceuk@artofwork.solutions. Likewise, if you would like your data processing limited in anyway or delayed, please also contact serviceuk@artofwork.solutions where all queries will be dealt with in a timely way. To understand more about our Data Erasure, read our Data Erasure section for further details.

To help protect your privacy and security, Art of Work Solutions Ltd will take reasonable steps to verify your identity before granting you access to your personal data. Art of Work Solutions Ltd will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law.

Depending upon the circumstances and the request, Art of Work Solutions Ltd may not be permitted to provide access to personal data or otherwise fully comply with your request; for example, where producing your information may reveal the identity of someone else. Data subjects have the right to know from the data controller as to whether or not personal data concerning them is being processed, where and for what purpose, free of charge. However, Art of Work Solutions Ltd reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law should the request be deemed repetitive or excessive.
Likewise, Art of Work Solutions Ltd reserve the right to deny your requests where, in Art of Work Solutions Ltd’s discretion, they may be unfounded, excessive, or otherwise unacceptable under applicable law.

Personal Information Collected

Art of Work Solutions Ltd is a Management Consultancy and as such we collect a variety of personal data necessary to provide such services in a secure and confidential database accessible only by Art of Work Solutions Ltd.

Personal information collected by Art of Work Solutions Ltd is collected from both publicly available sources such as, but not limited to; third party event ticket sales providers, LinkedIn, submissions of information to our website directly and from telephone conversations and meetings with clients, employees and suppliers where the information was directly disclosed to our employees or consultants. Art of Work Solutions Ltd is required to collect personal information such as name, contact information and position in order to communicate services appropriate for them.

It is important to differentiate between the non-sensitive data required for ticket procurement which is collected from clients, employees and suppliers directly, and the sensitive data which is not requested unless we are legally required to do so at a later stage of the contract delivery. Data that is deemed non-sensitive includes personally identifiable information such as: name, professional experience and contact information. By choosing to enter your personal information on our website and by sending this to our employees or consultants directly, you indicate your acceptance and willingness to disclose this information to Art of Work Solutions Ltd and to be considered, when appropriate, for one of Art of Work Solutions Ltd confidential mandates.

Art of Work Solutions Ltd recommends that you do not provide data deemed as sensitive data through our website or event ticket sales providers; however, we do not forbid the collecting of such data. Your choice to provide such data to Art of Work Solutions Ltd remains a personal decision. This data is not required by Art of Work Solutions Ltd for eligibility of our services and events, and data deemed sensitive could be, but is not limited to, information related to race or ethnicity, political views, religion and/or similar beliefs, trade union memberships, physical and/or mental health impairments, sexual preference, or criminal record. If, for any reason, you do wish to provide such information deemed as sensitive data, Art of Work Solutions Ltd accepts your explicit consent to use that information in the methods described throughout this Privacy Policy.

It is rare that data deemed as sensitive data will be requested.
What we do with the information we gather

In most standard situations, we provide personal information regarding clients, employees and suppliers via our secure masterclass portals with the purpose to create a network for those who have received Art of Work Solutions Ltd’s services. Below is a list of various ways in which we may use and/or disclose supplied non-sensitive personal information that was transmitted to Art of Work Solutions Ltd;

1) Art of Work Solutions Ltd may use personal information collected regarding potential clients to identify professional opportunities that we deem relevant and of interest for the client. We then use this personal information to contact the client with available solutions.

2) The information obtained by Art of Work Solutions Ltd in regard to our clients, including business contact information is kept and used as part of the provision of our network collaboration feature on the secure masterclass portals.

3) Other situations that could involve use of personal information could include but are not limited to: updating of data; responding to inquiries; other communications; modification, improvement, refinement and validation of intellectual property and technology; accounts and records; responding to complaints and other inquiries; personal data can also be used for proposals, engagement letters, presentations, research surveys, white papers, advertising, marketing and public relations.

Art of Work Solutions Ltd remains responsible for how the personal information we collect will be used. In some situations, Art of Work Solutions Ltd reserves the right to work with suppliers who provide services that may include, but are not limited to; database hosting, server hosting, website hosting, IT consulting services, payroll services, attorneys, accountants, and other administrative and back-office services and security services. As part of providing those services, such third parties will be provided with access to personal information only when deemed absolutely necessary in order to carry out standard business practices for the services of Art of Work Solutions Ltd. Art of Work Solutions Ltd carefully screens and selects all of our suppliers based on their own security and personal data processes and policies and strict policies are put in place to secure all of our data held.

Art of Work Solutions Ltd may also analyse your personal data or aggregated/pseudonymized data to improve our business processes and augment our ability to attract suitable clients. Art of Work Solutions Ltd will also use your data for business intelligence purposes regarding the markets we operate in. This concerns using title and location to analyse current markets and opportunities.

Art of Work Solutions Ltd reserves the right to disclose or transfer any and all personal information that we collect in connection with the provision of our services in the event of a sale of our company, a merger, or consolidation involving Art of Work Solutions Ltd.
Data Retention

Art of Work Solutions Ltd have variable data retention policies depending upon the date of personal data and whether both parties continue to do business together. If you accept a proposal/contract by Art of Work Solutions Ltd, any relevant personal data collected will become part of your personnel records and will be retained for 7 years and/or in accordance with specific country requirements.

If a proposal/contract by Art of Work Solutions Ltd is not accepted, Art of Work Solutions Ltd may nevertheless continue to retain and use your personal data for a period of 5 years (which may vary depending on the country) for system administration purposes, to consider you for potential future services, and to perform research.

Security Disclosure

Art of Work Solutions Ltd collects personal data on its employees, clients and suppliers for the sole purpose of efficiently providing our services. We only collect the minimum personal data required from employees, clients and suppliers in order to provide a requested service and in order to maintain an effective relationship with our clients.

We are committed to ensuring that your information is secure. In order to prevent your Personal Data against unauthorised access, accidental loss, improper use and disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. However, the internet itself is not completely secure and although we will do our best to protect your Personal Data the transmission of your data to us is done so at your own risk.

Art of Work Solutions Ltd will not sell, resell, lease or license your Personal Data to any third parties.

Your Personal Data will be stored on secure servers and databases with our carefully selected service providers. Third Party providers and suppliers have agreements and policies to ensure the security of personal data. Alongside this, only authorised personnel from third parties can access data and this may be limited in part depending upon security permissions. Moreover, their own employees are signed into non-disclosure and confidentiality agreements and are trained in maintaining compliance.

Nevertheless, despite these precautions and measures taken to protect data security, Art of Work Solutions Ltd cannot guarantee that unauthorised persons will not obtain access to your personal information.
International Data Transfers

We may transfer your Personal Data to countries outside the EEA where the level of protection may not be as comprehensive as it is within the EEA.

Your personal data may be accessed by employees, consultants, clients and suppliers working in different countries within Art of Work Pty Ltd organisation. Individuals performing administrative functions and IT personnel within Art of Work Pty Ltd may also have a limited access to your personal data in order to perform their jobs.

Art of Work Solutions Ltd has legal and contractual mechanisms to ensure adequate protection of personal data that may be processed by Art of Work Solutions Ltd partners and suppliers.

Data Erasure

GDPR introduces the right to erasure which is alternatively known as the right to be forgotten, under Article 17. This gives individuals the right to request that their personal data be erased, where, there is no compelling reason for its continued processing. The Right to Erasure requires a complete removal of a personal data, therefore archiving personal data will not meet the erasure requirements under the GDPR.

When does the Right to Erasure apply?

The Right to Erasure does not provide an absolute ‘right to be forgotten’. Data subjects have a right to be forgotten and prevent further data processing in specific circumstances:

- The personal data is no longer necessary in relation to the purpose for which it was originally collected or processed;
- When the data subject withdraws consent;
- When the data subject’s personal data was unlawfully processed;
- The personal data needs to be erased to comply with legal obligations;
- The data subject objects to their data being processed and there is no overriding legitimate interest to continue processing the data.

When does the Right to Erasure not apply?

There are circumstances where data subjects no longer have the ‘right to be forgotten’. Data subjects can have data processed on them in the following circumstances:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation for the performance of a public interest task or exercise of official authority;
- for public health purposes in the public interest;
archiving purposes in the public interest, scientific research historical research or statistical purposes; or
the exercise or defence of legal claims.

Art of Work Solutions Ltd will comply with all requests for data requests when it is a feasible request, however some circumstances may prevent Art of Work Solutions Ltd from fully complying or not deleting all data.

This is split in between two types of data subjects:

- **Employees**
- **Clients and Suppliers**

**Employees**

Where Employees are concerned their personal data is stored on an online HR system and on company hard drives. This data is necessary to comply with legal obligations relating to company finances and employment. This data would be kept for a maximum of 7 years to comply with legal obligations. When an Employee has left the business, their online account is thereby terminated with immediate effect after their last working day. This data is hard-deleted and cannot be retrieved. Data is also stored on the company hard drives and this would be hard erased after 7 years.

**Clients and Suppliers**

Clients and suppliers’ personal data is stored on an online database and on company hard drives. The data is necessary to comply with legal obligations relating to company finances. This data would be kept for a maximum of 7 years to comply with legal obligations.

Art of Work Solutions Ltd has a policy to hard delete personal data after 7 years. Data retention is to fulfil legal and financial obligations. There will be extraneous circumstances where data can be deleted beforehand which includes:

- If we have not done business with you for over 7 years (client)
- If you were employed with the business over 7 years ago
- If we do not need your data/ no longer needs to be processed
- If data did not have explicit consent (prior to the legislation)

**Data Deletion**

Art of Work Solutions Ltd aims to keep data on file for a period of 7 years unless otherwise stipulated. Data would be hard erased after this time unless the subject of the data requests otherwise or has been engaged with during this time and data on them is necessary for archiving purposes in the public interest. Consent would be obtained from data subjects in order to keep information on them. Subjects of data have the right to be forgotten and erased from records upon request, provided, it no longer needs to be processed for business or financial reasons. Subjects must make their request by phone, email or letter stipulating what data they
would like erased and this will be processed within 48 hours. We would send confirmation of this either by email or letter.

Cookies and other tracking technologies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Art of Work Solutions Ltd do not use cookies on their website. However, Art of Work Solutions Ltd use anonymised tracking for the purpose of analytics and personalised tracking to provide individuals with a customized online experience.

Links to other websites

Our website and masterclass portals may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

We may use your personal information to send you promotional information of which we think you may find interesting, if you tell us that you wish this to happen. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by emailing us at serviceuk@artofwork.solutions.

Our marketing emails will have an unsubscribe link at the bottom of correspondence. By clicking unsubscribe this will unsubscribe you from our marketing emails. To unsubscribe completely or to query what data we have please email serviceuk@artofwork.solutions.

If at any time you’d like to withdraw your consent to Art of Work Solutions Ltd holding your data, or if you believe that any information we are holding on you is incorrect or incomplete, or should you wish to report an alleged data breach under the General Data Protection Regulation (GDPR), or If you would like to directly contact our Data Protection Officer at Art of Work Solutions Ltd, please do so by emailing serviceuk@artofwork.solutions.

All persons under the General Data Protection Regulation (GDPR) are entitled to contact the supervisory authority in order to lodge a concern you may have with any of Art of Work Solutions Ltd data processing activities.
You may request details of personal information which we hold about you under the General Data Protection Regulation (GDPR). If you would like a copy of the information held on you, please email serviceuk@artofwork.solutions.

All complaints, requests for information access or removal will be acknowledged within seven working days and we will endeavour to resolve all queries within thirty days.

Changes to our Privacy Policy

Art of Work Solutions Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. Please check our website regularly to keep up-to-date.

This policy is effective from 25 May 2018.