DATA PROTECTION STATEMENT FOR CHRIS MEE GROUP (CMG)

Last Updated: 29th of November 2021

1. ABOUT US

This Data Protection Statement applies to the following companies in the Chris Mee Group of companies:

Chris Mee & Associates Limited, Euro Business Park, Little Island, Cork T45 DK25

Mary Daly Hospitality Services Limited, Island Cross, Little Island, Cork, T45 TY31

Carbon Action Consultants (UK) Limited, Tallis House, 2 Tallis Street, London, EC4Y 0AB

References to "We", "Us" the "Company" and "CMG" shall apply to the company in the group that is processing your Personal Data.

CMG is a leading provider of Health and Safety, Energy and Environmental services. Our services include Consultancy, Training and Recruitment. We deliver these services to a very large range of clients from multinationals to SMEs. At CMG our unique selling points are practical solutions, partnership arrangements with our clients and quality of delivery in all cases.

In order to provide our services, we need to process Personal Data. We are committed to protecting the rights personal data of individuals in accordance with data protection legislation including the General Data Protection Regulation in Europe (the "**GDPR**").

We have a separate Data Protection statement for our recruitment business and for internal recruitment of staff.

2. <u>CONTACT DETAILS</u>

If you have any questions about this Data Protection Statement or the way in which your Personal Data is being used by us, please contact:

The Data Protection Lead CMG Euro Business Park, Little Island, Cork T45 DK25

Email:dataprotection@cmse.ieTelephone:021-4978100

3. THE PURPOSE OF THIS DATA PROTECTION STATEMENT

This Data Protection Statement applies to Personal Data. The definition of Personal Data is as follows:

"**Personal Data**" means any information relating to an identified or identifiable natural person ('**data subject**'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This Data Protection Statement describes our approach to data protection and sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be used by us where we are controllers of that Personal Data for the purposes of the GDPR. Please read this Data Protection Statement carefully to understand our views and practices regarding the Personal Data we collect, as controllers under the GDPR, and how we will treat it.

4. WHO THIS DATA PROTECTION STATEMENT APPLIES TO

This Data Protection Statement provides specific information relating to the following individuals whose Personal Data we process:

- (i) business contact data including our customers, suppliers, partners, shareholders, investors and business prospects "**Business Contacts**"; and
- (ii) users/guests of our Website "Website Users".

Personal Data of employees of the Company is dealt with in a separate internal Data Protection notice.

5. SOURCES OF PERSONAL DATA

BUSINESS CONTACT PERSONAL DATA

We collect Business Contact Personal Data from our business contacts including – customers, suppliers, partners, shareholders, board members, and business prospects.

We source Business Contact Personal Data in order to serve the business relationship. We will only ever source Personal Data that is necessary and in a way that would be generally expected.

We receive Personal Data about Business Contacts from a variety of sources, as follows:

- the Personal Data is often provided by the Business Contact as part of the business relationship;
- the Personal Data may be collected from public sources like LinkedIn;
- the Personal Data may be collected indirectly from another person within the company of the Business Contact;
- the Personal Data may be collected through our website;
- the Personal Data may be collected indirectly from a website or from a third party.

WEB DATA

We may collect Website User Personal Data from all visitors to our website in order to improve our services and develop the Website.

For more details please refer to our Cookie Notice.

6. CATEGORIES OF PERSONAL DATA

We process the following categories of Personal Data. For each category we have included an example of the type of Personal Data that may be part of that category:

Personal Data Category	Description
Identification Data	may include a person's name, photograph, PPSN, date of birth, driver's license and passport information.
Contact Data	may include a person's email address, phone number, postal address, other communication details (e.g. Social Media links)
Communication Data	may include phone calls, texts, email correspondence and hard copy correspondence.
Ecommerce Data	may include Contact Data, Communication Data, order history, account number, job position, invoice details, registration information.
Education Data	may include previous learning and courses history, information about their skills and experience and role data.
Marketing Data	may include Identification Data and Contact Data and any preferences in receiving marketing from us and your communication preferences.
Financial Data	may include Identification Data, Contact Data and payment related information or bank account details and financial data received as part of the services that we provide.
Web Data	may include Personal Data provided on any forms on our website and, to the extent that it includes Personal Data, information on the type of device you're using, its IP address, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

7. OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA

We process all Personal Data lawfully and in accordance with the requirements of the law. The GDPR sets out the legal grounds for processing Personal Data.

When the Company processes Personal Data it is generally on one of the following legal basis:

CONTRACT

We will process Personal Data where necessary to perform our obligations relating to or in accordance with any contract that we may have with you or to take steps at your request prior to entering into that contract;

CONSENT

For certain processing activities we may rely on your consent.

Where we are unable to collect consent for a particular processing activity, we will only process the Personal Data if we have another lawful basis for doing so.

You can withdraw consent provided by you at any time by contacting us at <u>dataprotection@cmse.ie</u>.

LEGITIMATE INTEREST

At times we will need to process your Personal Data to pursue our legitimate business interests, for example for administrative purposes, to collect debts owing to us, to provide information to you, to expand our business opportunities, to operate, evaluate, maintain, develop and improve our websites and services or to maintain their security and protect intellectual property rights.

We will not process your Personal Data on a legitimate interest basis where the impact of the processing on your interests or fundamental rights and freedoms outweigh our legitimate interests. You may object to any processing we undertake on this basis. If you do not want us to process your Personal Data on the basis of our legitimate interests, contact us at <u>dataprotection@cmse.ie</u> and we will review our processing activities.

LEGAL OBLIGATION

If we have a legal obligation to process Personal Data, such as the payment of taxes, we will process Personal Data on this legal ground.

8. OUR PROCESSING ACTIVITIES

We use your Personal Data to provide you with our services and to assist us in the operation of our Company. Under data protection law, we must ensure that the purpose of processing is clear.

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.

Purpose of Processing	Categories of Personal Data	Lawful Basis
 Service Delivery activities to contact you about payments to and from you for customer relationship management and support to send notifications about changes/updates to our products and services to fulfil registration requirements for courses to fulfil our legal and contractual obligations Marketing & Promotion activities to respond to any requests from you to send newsletters and other information that maybe of interest to contact you as part of our business relationship or for lead generation and general administration to inform you of events or webinars that might be of interest to deliver and organise our conferences, seminars, events 	 Identification Data Contact Data Communications Data Education Data Marketing Data Contact Data Web Data 	 Contract Legitimate Interest Consent Legitimate Interest
 Website Delivery to respond to web forms completed by you to promote our products and services 	Web Data	ConsentLegitimate Interest

 to improve and administer the Website; and for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes to ensure the safety and security of our website and our services. Ecommerce Services to allow you to order products on the ecommerce section of the website to process and deliver your orders to process payments for products ordered to allow you to see previous orders to promote products that may be of interest to you to ensure the security of the ecommerce service 	 Ecommerce Data Web Data Marketing Data Contact Data Financial Data 	 Legitimate Interest Contract
 Administration of Customer Relationship to manage/respond to a complaint/appeal to notify you of updates to this Data Protection	 Identification Data Contact Data Communication	 Contract Legitimate
Statement	Data Financial Data Education Data	Interest
 Managing payments and administration of	 Identification Data Contact Data Communication	 Contract Legitimate
<u>contract</u> to process payments to and from our business to manage and administer our contracts	Data Financial Data	Interest
 Management of Corporate Affairs to take minutes at board meetings to contact shareholders/investors to enter into partnerships and other	 Identification Data Contact Data Communication	 Contract Legitimate
commercial relations to undertake appropriate due diligence	Data Financial Data	Interest Legal Obligation

9. DISCLOSURE OF PERSONAL DATA

In certain circumstances, we may disclose Personal Data to third parties as follows:

- to business partners and subcontractors for the performance of any contract relating to our services, including email, Skype, Communication Platforms, Customer Relationship Management system, web developers, payment processors, data aggregators, hosting service providers, external consultants, auditors, IT consultants and lawyers;
- to accreditation bodies governing the courses provided including Solas, QQI, PHECC, IOSH, NEBOSH, FSPA
- to analytics and search engine providers that assist us in the improvement and optimisation of the Website;
- to the HSE (or any health authority) to facilitate any pandemic contact tracing activity;

- if we or substantially all of our company is merged with another company or acquired by a third party, in which case Personal Data held by us will be one of the transferred assets;
- to other companies in the CMG group of companies for the purposes of administration, marketing, recruitment and provision of our services;
- if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation (including tax, audit or other authorities), or in order to enforce or apply any contracts that we have;
- to protect our rights, property, or safety, or that of our Business Contacts or others. This may
 include exchanging Personal Data with other companies and organisations for the purpose of
 fraud protection. When we engage another organisation to perform services for us, we may
 provide them with information including Personal Data, in connection with the performance of
 those functions. We do not allow third parties to use Personal Data except for the purpose of
 providing these services.

10. SECURITY MEASURES

We will take all steps reasonably necessary to ensure that all Personal Data is treated securely in accordance with this Data Protection Statement and the relevant law, including the GDPR.

In particular, we have put in place appropriate technical and organisational procedures to safeguard and secure the Personal Data we process.

We monitor for and do everything we can to prevent security breaches of the Personal Data that we process.

Once we have received your Personal Data, we will use strict procedures and security features for the purpose of preventing unauthorised access and ensuring that only those who need to have access to your Personal Data can access it.

We also use secure connections to protect Personal Data during its transmission.

If you think that there has been any loss or unauthorised access to Personal Data of any individual, please let us know immediately.

11. TRANSFERS OUTSIDE THE EEA

In order to provide our products and services we may need to transfer Personal Data outside the European Economic Area (EEA). We ensure that any transfer of Personal Data outside the EEA is undertaken using legally compliant transfer mechanisms and in accordance with the GDPR.

If we transfer Personal Data outside of the EEA, we generally rely on the Standard Contractual Clauses under Article 46.2 of the GDPR adopted by the EU Commission. We may also rely on some of the other legally compliant transfer mechanisms provided under the GDPR.

12. COOKIES

Cookies are small text files placed on your computer or mobile device by websites that you visit, and they help us improve the products and services that we offer you. They are used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies may allow a website to remember your activity over a period of time. Cookies are optional and you do not have to accept them.

Further information on the cookies we use on the website and the purpose behind their respective uses are set out in our Cookie Notice.

13. THIRD PARTY WEBSITES

Our Website may contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy settings, and these are not endorsed by us. We do not accept any responsibility or liability for these third-party websites. Please undertake the appropriate due diligence before submitting any Personal Data to these websites.

14. RETENTION

In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate business interests. We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims.

Further information about our retention practices are set out below:

Purpose of Processing	Categories of Personal Data	Retention Period
Service Delivery Activities	 Identification Data Contact Data Communications Data 	7 years for evidence of contract delivery. Training records are retained for 2 years.
Marketing and Promotion Activities	 Error! Reference source not found. Error! Reference source not found. Error! Reference source not found. 	12 months in the case where no meaningful engagement or earlier in the case you unsubscribe.
Website Delivery	• Error! Reference source not found.	12 months
Ecommerce Services	Ecommerce DataWeb Data	7 years
Managing Payments and administration of the contract	Personal Data Categ Identification Data Contact Data Communication Data	7 years

Ecommerce Data	may include Contact Data, (
	history, account number, jo registration information.
Education Data	may include previous learn information about their skill data.
Marketing Data	may include Identification Dat preferences in receiving ma communication preferences.
Financial Data	may include Identification payment related information financial data received as pa provide.
Web Data	may include Personal Data pr website and, to the extent the information on the type of address, operating system, re page views and website na information about the timing your service use.
15. OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA	
We process all Personal Data lawfully and in accordance with the requirements of the law. The GDPR sets out the legal grounds for processing Personal Data.	
When the Company processes Personal Data it is generally on one of the following legal basis:	
<u>CONTRACT</u>	

<u>CONSENT</u>	
For certain processing	
activities we may rely on	
your consent.	
Where we are unable to	
collect consent for a	
particular processing	
activity, we will only process	
the Personal Data if we have	
another lawful basis for	
doing so.	
doing so.	
You can withdraw consent	
provided by you at any time	
by contacting us at	
dataprotection@cmse.ie.	
LEGITIMATE INTEREST	
At times we will need to	
process your Personal Data	
to pursue our legitimate	
business interests, for	
example for administrative	
purposes, to collect debts	
owing to us, to provide	
information to you, to	
expand our business	
opportunities, to operate,	
evaluate, maintain, develop	
and improve our websites	
and services or to maintain	
their security and protect	
intellectual property rights.	
We will not process your	
Personal Data on a	
legitimate interest basis	
where the impact of the	
processing on your interests	
or fundamental rights and	
freedoms outweigh our	
legitimate interests.	
You may object to any	
processing we undertake on	
this basis. If you do not want	
us to process your Personal	
Data on the basis of our	
legitimate interests, contact	
us at	
dataprotection@cmse.ie	

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	and we will review our processing activities.				
	LEGAL OBLIGATION				
	If we have a legal obligation to process Personal Data, such as the payment of taxes, we will process Personal Data on this legal ground.				
	16. OUR PROCESSING ACTIVITIES				
	We use your Personal Data to provide you with our services and to assist us in the operation of our Company. Under data protection law, we must ensure that the purpose of processing is clear.				
	We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.				
	Purpose of Processing		Categories of P Data	ersonal	Lawfu
	 Service Delivery activities to contact you about pryou for customer relationsh support to send notifications aborour products and service to fulfil registration requisited to fulfil our legal and condition 	ip management and ut changes/updates to s irements for courses	 Identification Contact Data Communicat Data Education Data 	ions	• Cc • Le In
	 to respond to any reques to respond to any reques to send newsletters and one maybe of interest to contact you as parelationship or for lead gradministration 	<u>rities</u> sts from you other information that art of our business	 Marketing Data Contact Data Web Data 		 Co Le In

 to inform you of events or webinars that might be of interest to deliver and organise our conferences, seminars, events 	
Website Delivery• to respond to web forms completed by you• to promote our products and services• to improve and administer the Website; and• for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes• to ensure the safety and security of our website and our services.Ecommerce Services• to allow you to order products on the ecommerce section of the website• to process and deliver your orders• to allow you to see previous ordered• to allow you to see previous orders• to promote products that may be of interest to you• to ensure the security of the ecommerce	 Web Data Ecommerce Da Web Data Marketing Data Contact Data Financial Data
service Administration of Customer Relationship • to manage/respond to a complaint/appeal • to notify you of updates to this Data Protection Statement	 Identification C Contact Data Communication Data Financial Data Education Data
 Managing payments and administration of contract to process payments to and from our business to manage and administer our contracts 	 Identification C Contact Data Communication Data Financial Data
 Management of Corporate Affairs to take minutes at board meetings to contact shareholders/investors to enter into partnerships and other commercial relations to undertake appropriate due diligence 	 Identification C Contact Data Communication Data Financial Data
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Management of Corporate	•	7 years unless required to retain
Affairs	Personal Data Categ	indefinitely
	Identification Data	
	Contact Data	
	Communication Data	
	Ecommerce Data	
	Education Data	
	Marketing Data	
	Financial Data	
	Web Data	
	17. OUR LEGAL BASIS FOR	
	PROCESSING PERSONAL	
	DATA	
	We process all Personal	
	Data lawfully and in	
	accordance with the	
	requirements of the law.	
	The GDPR sets out the legal	
	grounds for processing	
	Personal Data.	
	When the Company	
	processes Personal Data it is	
	generally on one of the	
	following legal basis:	
	CONTRACT	
	<u>CONTRACT</u>	

	We will process Personal	
	Data where necessary to	
	, perform our obligations	
	relating to or in accordance	
	with any contract that we	
	-	
	may have with you or to take	
	steps at your request prior	
	to entering into that	
	contract;	
	<u>CONSENT</u>	
	For certain processing	
	activities we may rely on	
	your consent.	
	,	
	Where we are unable to	
	particular processing	
	activity, we will only process	
	the Personal Data if we have	
	another lawful basis for	
	doing so.	
	You can withdraw consent	
	provided by you at any time	
	by contacting us at	
	dataprotection@cmse.ie.	
	LEGITIMATE INTEREST	
	At times we will need to	
	process your Personal Data	
	to pursue our legitimate	
	business interests, for	
	example for administrative	
	purposes, to collect debts	
	owing to us, to provide	
	information to you, to	
	expand our business	
	opportunities, to operate,	
	evaluate, maintain, develop	
	and improve our websites	
	-	
	and services or to maintain	
	their security and protect	
	intellectual property rights.	
	Ma will not process your	
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	Personal Data on a	
	legitimate interest basis	
	where the impact of the	
	processing on your interests	
	or fundamental rights and	
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freedoms outweigh our legitimate interests. You may object to any				
processing we undertake on this basis. If you do not want us to process your Personal				
Data on the basis of our legitimate interests, contact us at dataprotection@cmse.ie and we will review our processing activities				
processing activities.				
If we have a legal obligation to process Personal Data, such as the payment of taxes, we will process Personal Data on this legal ground.				
18. OUR PROCESSING ACTIVITIES				
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Purpose of Processing		Categories of Po Data	ersonal	Lawfu
 Service Delivery activities to contact you about p you for customer relationsh support to send notifications abo our products and service 	hip management and ut changes/updates to	 Identification Contact Data Communicat Data Education Da 	ions	 Cc Le Int

 to fulfil registration requirements for courses to fulfil our legal and contractual obligations Marketing & Promotion activities to respond to any requests from you to send newsletters and other information that maybe of interest to contact you as part of our business relationship or for lead generation and general administration to inform you of events or webinars that might be of interest to deliver and organise our conferences, seminars, events 	 Marketing Data Contact Data Web Data
 Website Delivery to respond to web forms completed by you to promote our products and services to improve and administer the Website; and for internal operations, including support, troubleshooting, data research, statistical and survey purposes to ensure the safety and security of our website and our services. Ecommerce Services to process and deliver your orders to process payments for products ordered to allow you to see previous orders to promote products that may be of interest to you to ensure the security of the ecommerce security of the ecommerce 	 Web Data Ecommerce Da Web Data Marketing Data Contact Data Financial Data
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Managing payments and administration of contract • to process payments to and from our business • to manage and administer our contracts Management of Corporate Affairs	 Identification C Contact Data Communication Data Financial Data Identification C
 to take minutes at board meetings to contact shareholders/investors 	 Contact Data Communication Data

 to enter into partnership commercial relations to undertake appropriate 	• Financial Data
 Error! Reference source not found. Communication Data Error! Reference source not found. 	

In certain cases, we may retain Personal Data for longer than specified here if required under relevant laws or in the event of any legal claim.

19. YOUR RIGHTS

You have various rights relating to how your Personal Data is used.

Right of access to the Personal Data we hold on you

You have the right to ask for all the Personal Data we have about you. When we receive a request from you in writing, we must give you access to everything we've recorded about you as well as details of the processing, the categories of Personal Data concerned and the recipients of the Personal Data.

We will provide the first copy of your Personal Data free of charge, but we may charge you a reasonable fee for any additional copies.

We cannot give you access to a copy of your Personal Data in some limited cases including where this might adversely affect the rights and freedoms of others.

Right of rectification of Personal Data

You should let us know if there is something inaccurate in your Personal Data.

We may not always be able to change or remove that Personal Data, but we will correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Right of erasure of Personal Data (right to be forgotten)

In some circumstances you can ask for your Personal Data to be deleted, for example, where:

- your Personal Data is no longer needed for the reason that it was collected in the first place
- you have removed your consent for us to use your Personal Data (where there is no other lawful basis for us to use it)
- there is no lawful basis for the use of your Personal Data
- deleting the Personal Data is a legal requirement

Where your Personal Data has been shared with others, we will do what we can to make sure those using your Personal Data comply with your request for erasure.

Please note that we can't delete your Personal Data where:

- we are required to have it by law
- it is used for freedom of expression
- it is used for public health purposes
- it is used for scientific or historical research or statistical purposes where deleting the Personal Data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

Right to restrict what we use your Personal Data for

You have the right to ask us to restrict what we use your Personal Data for where:

- you have identified inaccurate Personal Data, and have told us of it
- where we have no legal reason to use the Personal Data, but you want us to restrict what we use it for rather than erase the Personal Data altogether

When Personal Data is restricted it can't be used other than to securely store the Personal Data and with your consent to handle legal claims and protect others, or where it's for important public interests.

Right to have your Personal Data moved to another provider (data portability)

You have the right to ask for your Personal Data to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your Personal Data with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

Right to object

You have the right to object to processing of your Personal Data which is based on public interest or legitimate interest processing. We will no longer process the Personal Data unless we can demonstrate a compelling ground for the processing.

Right not to be subject to automated decision-making

You have the right not to be subject to a decision based solely on automated processing. This right shall not apply where the processing is necessary for a contract with you, or the processing is undertaken with your explicit consent or the processing is authorised by law.

You can make a complaint

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

20. AMENDMENTS TO THIS DATA PROTECTION STATEMENT

We will post any changes on the Website and when doing so will change the effective date at the top of this Data Protection Statement. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services.

In some cases, we may provide you with additional notice of changes to this Data Protection Statement, such as via email. We will always provide you with any notice in advance of the changes taking effect where we consider the changes to be material.

Thank you for reading our Data Protection Statement. Please contact us if you have any questions. If we are unable to resolve your concerns, you have the right to contact the supervisory authority in

the country where you live or work, or where you consider that the data protection rules have been breached

Contact Details for the relevant Supervisory Authorities are set out below for your information:

Country	Supervisory Authority	Contact Details
Ireland	Data Protection Commission	Online Form: https://forms.dataprotection.ie/contact Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland Tel: +353 578 684 800 or +353 761 104 800
UK	Information Commissioners Office	Contact Information:https://ico.org.uk/global/contact-us/Live Chat:ico.org.uk/livechatHelpline:0303 123 1113