
PRIVACY POLICY

BACKGROUND:

CoachDevelopTransform (CDT) is a specialised subsidiary of Career Decisions Ireland Ltd.

CDT/Career Decisions Ireland Ltd. understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.coachdeveloptransform.com and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of www.coachdeveloptransform.com. If you do not accept and agree with this Privacy Policy, please stop using www.coachdeveloptransform.com immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Cookie”	means a small text file placed on your computer or device by www.coachdeveloptransform.com when you visit certain parts of www.coachdeveloptransform.com and/or when you use certain features of this site. Details of the Cookies used by www.coachdeveloptransform.com are set out in section 13, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via www.coachdeveloptransform.com . This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).
“We/Us/Our”	Means Career Decisions Ireland Ltd. (CoachDevelopTransform is a specialised subsidiary of Career Decisions Ireland), a limited company registered in Ireland under company number 442022.

2. Information About Us

- 2.1 CoachDevelopTransform (CDT) is owned and operated by Career Decisions Ireland, a limited company registered in Ireland under company number 442022.

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of www.coachdeveloptransform.com. www.coachdeveloptransform.com may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. **Your Rights**

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification of any personal data We hold about you if it is inaccurate or incomplete (please contact Us using the details in section 14);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 14 and we will do Our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the Ireland's supervisory authority, the Data Protection Commissioner's Office.
- 4.3 For further information about your rights, please contact the Data Protection Commissioner's Office or your local Citizens Information Centre.

5. **What Data Do We Collect?**

Depending upon your use of www.coachdeveloptransform.com, We may collect some or all of the following personal data (please also see section 13 on our use of Cookies and similar technologies)

- 5.1 Name
- 5.2 Business/company name
- 5.3 Contact information such as email addresses and telephone numbers
- 5.4 IP address
- 5.5 Web browser type and version
- 5.6 Operating system

6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under GDPR at all times. For more details on security see section 7, below.
- 6.2 CDT/Career Decisions Ireland is committed to ensuring that all employees, associates, contractors and data processors comply with the Data Protection Acts regarding:
- The processing and confidentiality of any personal data held by Career Decisions Ireland Ltd., and
 - The privacy rights of individuals under the legislation.
- 6.3 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, We may use your data for the following purposes:
- 6.3.1 Providing and managing your access to www.coachdeveloptransform.com
- 6.3.2 Personalising and tailoring your experience on www.coachdeveloptransform.com
- 6.3.3 Replying to emails from you
- 6.3.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the link within the mailing or by e-mailing admin@careeerdecisions.ie)
- 6.3.5 Market research
- 6.3.6 Analysing your use of www.coachdeveloptransform.com and gathering feedback to enable Us to continually improve www.coachdeveloptransform.com and your user experience
- 6.4 With your permission or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message and/or post with information, news and details on our range of services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under GDPR and, where relevant the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.5 You have the right to withdraw your consent to us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

Until such time that you unsubscribe from our mailings

How and Where Do We Store Your Data?

- 6.7 We only keep your personal data for as long as we need to in order to use it

as described above in section 6, and/or for as long as we have your permission to keep it.

6.7.1 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using www.coachdeveloptransform.com and submitting information to us. If we do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within Ireland and under the GDPR.

6.8 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through www.coachdeveloptransform.com.

7. Do We Share Your Data?

7.1 We may sometimes contract with third parties to supply products and services to you on our behalf. These may include search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

7.2 We may compile statistics about the use of www.coachdeveloptransform.com including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

7.3 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within Ireland and under the GDPR.

8. What Happens If Our Business Changes Hands?

8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

8.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

9. **How Can You Control Your Data?**

- 9.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via www.coachdeveloptransform.com, you may be given options to restrict our use of your data. In particular, We aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

10. **Your Right to Withhold Information**

- 10.1 You may access www.coachdeveloptransform.com without providing any data at all.
- 10.2 You may restrict our use of Cookies. For more information, see section 13

11. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us for more details at admin@careerdecisions.ie, or using the contact details below in section 14.

12. **Our Use of Cookies**

- 12.1 www.coachdeveloptransform.com may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by Us. We use Cookies to facilitate and improve your experience of www.coachdeveloptransform.com and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using www.coachdeveloptransform.com you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on www.coachdeveloptransform.com for Analytical purposes. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily

- 12.2 For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of www.coachdeveloptransform.com and your use and experience of www.coachdeveloptransform.com will not be impaired by refusing consent to them.
- 12.3 All Cookies used by and on www.coachdeveloptransform.com are used in accordance with current Cookie Law.
- 12.4 Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling www.coachdeveloptransform.com to provide the best possible experience and service to you. You may, if you

wish, deny consent to the placing of Cookies; however certain features of www.coachdeveloptransform.com may not function fully or as intended

12.5 Certain features of www.coachdeveloptransform.com depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.10, but please be aware that www.coachdeveloptransform.com may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.]

12.6 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Essential Cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, and to use online forms.	Yes

12.7 www.coachdeveloptransform.com uses analytics services provided by Google Analytics and Communigator. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how is used. This, in turn, enables Us to improve www.coachdeveloptransform.com and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of www.coachdeveloptransform.com, it does enable Us to continually improve www.coachdeveloptransform.com, making it a better and more useful experience for you.

12.8 The analytics services used by www.coachdeveloptransform.com uses Cookies to gather the required information.

12.9 The analytics services used by www.coachdeveloptransform.com uses the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
Google Analytics	Third	Google Analytics	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily

12.10 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

12.11 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access www.coachdeveloptransform.com more quickly and efficiently including, but not limited to, login and personalisation settings.

12.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

13. **Contacting Us**

If you have any questions about www.coachdeveloptransform.com or this Privacy Policy, please contact Us by email at admin@careerdecisions.ie. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

14. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on www.coachdeveloptransform.com and you will be deemed to have accepted the terms of the Privacy Policy on your first use of www.coachdeveloptransform.com following the alterations. We recommend that you check this page regularly to keep up-to-date.