



Courses 123 & Start My Course

Privacy Policy

Table of Contents

Introduction	2
Processing of personal data	3
Summary of information use	3
How you provide information	4
Information received from other sources	5
Marketing	5
Analytics	5
Automated decision making	5
Other processing	5
Data recipients	6
Retention period	6
Data storage	7
Security measures	7
Your rights	8
Cookies	8
Age of users	8
Changes to this policy	9
Contact us	10
How to complain	10

Introduction

Thank you for your interest in our website and our online services. RiskWize Limited trading as EssentialSkillz (and the subsidiary EssentialSkillz Limited) ("**we**", "**us**", "**our**") are committed to protecting and respecting your privacy. Protecting visitors data and using it only in the way our visitors expect from us is our highest priority. Thus, the following policy is designed to inform you about the processing of your personal data and your rights regarding this processing according to the General Data Protection Regulation ("GDPR") and other data protection laws.

By visiting www.courses123.com & www.startmycourse.com ("**Site**") or by entering personal information and taking one or you are accepting and consenting to the practices described in this Privacy Policy.

- In some instances, Riskwize LTD T/A EssentialSkillz (and the subsidiary EssentialSkillz Limited) is the Data Controller according to the GDPR and therefore responsible for the data processing explained herein as it relates to individuals browsing the website and making purchases as an individual data subject.
- In certain circumstances we act as Data Processors on behalf of organisations purchasing content for batches of individuals (eg their own employees).

Our website (courses123.com & startmycourse.com) contains links to other websites. Our privacy policy applies only to our website(s), so if you click on a link to another website, you should read their privacy policy.

Summary of the websites

Courses123.com is the ecommerce website that we use to advertise and sell our elearning content. This website also contains a dashboard whereby you can view an overview of your purchases. Individuals can use Courses123 to purchase elearning content for personal use, or organisations can use Courses123 to purchase and distribute content to their employees (contractors, interns and so on).

Startmycourse.com is the website used by individuals to launch and complete courses.

Processing of personal data

We collect and process personal information to provide you access to our site, services and products in a timely, efficient and secure way. Further, we collect data:

- when necessary to carry out instructions or fulfil contractual obligations
- to comply with legal requests
- for legitimate business needs
- when given express or implied consent

Various data about your visit to our website and/or use of our online services will be recorded automatically. For example: your IP address, date and time, browser type, browser plugins, operation system, location, pages accessed, your clickstreams through the site, products viewed, page response times, error logs, length of visit, page interactions and similar. We have a legitimate interest to collect this type of data to optimise and improve our website as well as our online services.

Additionally, your personal data is processed if you provide it to us on your own account, eg as part of completing a registration form, a survey, an online application, or for online purchase (performance of a contract). You may also provide us with information during your time as our customer.

Note: If you are an individual completing elearning content, your name and relevant completion details will be processed (for example to generate a completion certificate). You might provide this to us as an individual or this may be provided to us by an organisation (typically your employer).

Summary of information use

The information gathered is used to:

- register you to our newsletter or mailing lists
- provide information about our products and services
- register you and your company as our customer
- fulfil our obligations under contracts entered into and/or to provide our services/products
- administer our relationship with you, for example, billing, collecting, accounting
- comply with and record legal obligations
- exercise or defend our legal rights
- comply with court orders
- improve our website, products, and services
- keep our website, products, and services secure
- record content completion and generate certificates

Note: If you are completing a course, we **only** process your details to record completion details or allow you access to your course.

How you provide information

Examples of the specific ways you submit information to us through our website:

- **Registering for a newsletter, email updates, or similar:** If you wish, you can subscribe for our newsletter on our website by filling out the registration form provided on the website or on the relevant pop-up. We also provide opt-in to newsletters and marketing checkboxes in various places across our websites. The personal data that are collected will be processed for sending newsletters or marketing to your email address. Your personal data will be processed until you unsubscribe from the newsletter by clicking the link provided in each newsletter you receive from us. Please note that you will not receive any newsletters from us anymore after you unsubscribe.
- **Submitting a contact form:** You can use the contact form on our website to contact us for many requests, such as for technical support. The personal data that you filled out into the contact form will be processed for answering your request and sending relevant information or low volume marketing content. Filling in and submitting the contact form constitutes an affirmative action by which you have given your consent to the data processing.
- **Using the online shop:** You can use our online shop and place an order by visiting Courses 123 online store. All personal data you have given in our online shop will be used for the purposes of delivering our products, services, content and for reasonable, low-volume marketing emails. We may process your data if you do not complete a transaction to send abandoned cart emails.

Without your personal data, we will not be able to process your order. Your personal data will be stored as long as it is necessary for us to fulfill our obligations towards you including but not limited to delivery of the products or services, providing warranties, support etc., except where we are legally obliged to further store your data for the purposes of submitting it to public authorities, for example to tax authorities. This storage and transfer of your personal data to public authorities, should it happen, is based on fulfilling a legal obligation.

- **When you create or register a customer or user account:** If you wish, you can create a customer account on our website by using the account registration form. If you create a customer account, you will not have to send us your personal data every time you are using our online shop or when you try to access information/materials intended only for registered customers. The personal data that you provided in the registration form will be processed for creating and maintaining your customer account.

Your personal data will only be stored until you delete your account. If you delete your account, your personal data will be deleted without undue delay except where we are legally obliged by law to further store your data. Please note that you will not be able to use your customer account anymore, after it has been deleted.

- **Requesting a demo or callback:** You can request a (free) demo or callback by using the form. The personal data that is collected in the registration form will be processed to set up a demo, offer support, and for reasonable, low-volume marketing emails. Filling in and submitting the form constitutes an affirmative action by which you have given your consent to the data processing.
- **Completing elearning content:** If you are taking elearning content, you will be asked to confirm your full name. This information is then used to allow you access to the course and to create a completion certificate.

Information received from other sources

We may combine this information you have given us with information we have received from other sources. We may use this information and the combined information for the purposes set out in this document.

Information may be provided to us by an organisation (typically your employer) who is using our site to provide you with elearning content.

Marketing

We may use information you have supplied to us to provide you with details of new or similar services, legal updates, business updates and other reasonable, low volume marketing emails. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt-out by contacting us. The lawful basis for this type of processing is legitimate interest.

Course completion information is not used for marketing purposes.

Analytics

We use analytic tools to analyse and optimise our website. We do this through the use of cookies.

Automated decision making

We do not use your data for automated decision making.

Other processing

There are other situation in which we may also process information in situation, including, but not limited to:

- queries received from the public
- data obtained from service providers or suppliers
- information supplied from job applicants or supplied to use by third-party employment and recruitment organisations

- data gathered at conferences and events we organise or attend
- voluntarily completed customer surveys or feedback

Data recipients

We may use third party service providers to process your personal data. These service providers may be located in countries within and outside the European Union (EU) and the European Economic Area (EEA). We ensure that these service providers process personal data in accordance with European data protection legislation to guarantee an adequate data protection level, even if personal data are transferred into a country outside the EEA for which no adequacy decision of the EU Commission exists. Transfers of personal data to other recipients is not performed, except where we are obliged to do so by law. For more information about appropriate safeguards for the international data transfer or a copy of them, please contact our Data Security Officer.

We may share data with selected third parties such as our subsidiaries, business partners, sub-processors or suppliers. We may share anonymous and aggregated usage data and reports in the normal course of operating our business; for example, we may share information with other Site or Services users, our customers or publicly to show trends or benchmark the general use of our Site and Services. For example, analytics and search engine providers who assist us in the improvement and optimisation of our Site.

Further, we may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or a member of our group of companies or substantially all of their assets are acquired by a third party, in which case personal data held by them about their customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions, terms of use and/or any other legal agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Retention period

Personal data provided to us via our website will only be stored until the purpose for which they were processed has been fulfilled. Insofar as retention periods under commercial and tax law must be observed, the storage period for certain data can be up to six years.

However, storage periods may also be amended due to our legitimate interest (eg to guarantee data security, to prevent misuse or to prosecute criminal offenders). We refresh bought marketing information annually and we delete marketing data after five years of inactivity.

We will stop processing data about you if and when you opt out.

Data storage

Courses123.com and Startmycourse.com are hosted on AWS London.

Security measures

We have taken appropriate measures to ensure that the data provided to us during the registration is adequately protected. These measures include, but are not limited to, encryption, access control, segregation of duties, internal audits etc.

Your rights

As a data subject, you can contact our Data Security Officer to make use of your rights. These rights are the following:

- The right to receive information about the data processing and a copy of the processed data;
- The right to demand the rectification of inaccurate data or the completion of incomplete data;
- The right to demand the erasure of personal data;
- The right to demand the restriction of the data processing;
- The right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmittance of these data to another controller;
- The right to object to the data processing;
- The right to withdraw a given consent at any time to stop a data processing that is based on your consent;
- The right to file a complaint with the competent supervisory authority: Data Protection Commissioner, Ireland.

Cookies

To make your visit to our website more pleasant and to enable the use of certain functions, we may use “cookies” on various pages. Cookies are small text files that are stored on your terminal device. Some of the cookies we use are deleted after the end of the browser session. Other cookies remain on your device and enable us or our partner companies to recognise your browser on your next visit. You can set your browser in such a way that you are informed about the setting of cookies separately and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or generally. For more information, see the help function of your Internet browser. If cookies are not accepted, the functionality of our website may be limited.

To find out more about how we use cookies you can access our [Cookie Policy](#).

Age of users

This Site and the Services are not intended for and shall not be used by anyone under the age of 18.

Changes to this policy

Any changes we may make to our Privacy Policy in the future will be posted to our Site. Please check back frequently to see any updates or changes to our Privacy Policy.

Contact us

Data Security: You can contact our Data Security Officer by using the following contact details:

- Address: EssentialSkillz, The Hub, Galway Technology Park, Parkmore, Galway Ireland, H91 K2WP
- Phone: 35391394350
- E-mail: DSO@EssentialSkillz.com

Other contacts: For any other queries relating to the products or services offered by RiskWize T/A EssentialSkillz you can contact:

- Address: EssentialSkillz, The Hub, Galway Technology Park, Parkmore, Galway Ireland, H91 K2WP
- Phone: 35391394350
- E-mail: info@EssentialSkillz.com

How to complain

You can also complain to the [Data Protection Commission](#) if you are unhappy with how we have used your data. The contact details are:

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland