



Privacy Policy

Vestfold Hudakademi is committed to protecting your personal information and to respecting your privacy

We are committed to always being clear and open about the information that we collect about you, and especially about what we aim to do with it. Our Privacy policy detailed below describes how we will use the information you give us, and it will provide you with courses you have requested so that we can enhance your experience with us as a delegate.

The information provided by you will also help us to better understand your delegate needs so that we can give you tailored courses and special offers.

Should you not wish to receive marketing messages, then we will of course stop sending them. We may however need to send you essential information relating to a course that you have booked to keep you informed about your program.

We will always keep your personal information secure and safe and in doing so, we will adhere to your data protection rights, with the added aim to give you control over your own information.

Please take a few moments to read through the information below and to understand about the types of personal information we collect; how we collect it; what we may use it for; and who we may share it with.

If you have questions, please contact us at the address below.

Without prejudice to your rights under applicable laws, the above statement and the Privacy Policy as detailed below are not contractual, and neither forms part of you using our academy as a delegate.

Privacy Policy

Controller of Personal Information

European Union and UK data protection law provides that any personal information processed by Vestfold Hudakademi in connection with this Privacy Policy is

controlled by Vestfold Hudakademi AS, which is the 'data controller' of your personal information.

If any of the course or other services that we provide are undertaken by one of our independent third-party associates or trainers, then they will also separately be a 'data controller' and you may wish to access the privacy policies of those data controllers directly.

What is personal your information?

Your personal information is all the details which identify you or could be used to identify you, and these include your name, contact details, your course schedule and / or your course program history.

To what does this policy apply?

Our Privacy Policy applies to all personal information about you that we collect, use, and otherwise process with regard to your relationship with us as a delegate or a potential delegate. This includes when you have courses with us or when you use one of our other services; web sites; or should you contact a member of our team or a member of the team of any of our independent third-party partners / trainers.

Course booking details confidentiality

When you book a course with us, you should always keep these details confidential. Giving your course booking details to others may allow them to access your course details through our systems.

Always be aware of and protect yourself against Internet fraud and 'phishing'

'Phising' is an Internet fraud practice which illegally gathers personal information by deception. Unsolicited emails are sent to individuals from lists illegally produced by a third party, and the recipients are asked to enter or reconfirm bank or password details into a 'cloned' or illegal copy website. Please be aware of these scam emails claiming to be from Vestfold Hudakademi.

When do we collect personal information about you?

We collect personal information about you whenever you use our services (whether these services are provided by us or by other trainers acting on our behalf), including when you have courses with us, when you use our website, or when you interact with us via email or phone. In addition, we may receive personal information about you from third party companies and/or trainers.

What types of personal information do we collect and retain?

When you use our services, you will need to provide us with your personal details or the details of the individual (delegate) who will be using our academy. We collect the following personal information:

1. Any information which you provide to allow us to complete and manage a training course.
2. Information collected during your course.
3. Information about the courses and programs that we have provided to you in the past.
4. Information about any course bookings and other interactions.
5. Information about your use of our websites.
6. Information about your device and your location if you have been browsing on our web site, for example your IP address or unique device ID. Your IP address is your unique numeric code which identifies your computer or other device. This can be switched off on your IT system.

Why would we collect sensitive personal data?

Certain categories of sensitive personal information, such as health or biometric information are special categories of data which require additional protection as per European Union & UK data protection law. We do not collect and process sensitive personal data unless it is specific to a particular course/s that you have requested from us. In addition, you may have sought clearance from us to undertake a course if you have a medical condition, or because you are more than 28 weeks pregnant. Other information may have been passed onto us by a third party such as a third-party trainer.

What do we do with your personal information?

The main purposes for which we use your personal information are to fulfil your course appropriately and effectively, to provide tuition specifically for your learning requirements, and to deliver the results you have asked for. We also need to manage the course booking process and to facilitate the correct trainer for your particular tuition. We may also need to send course information, updates and additional related service communications to you and to keep track of you in advance of additional course, or recommended programs.

We also use your personal information to help keep you safe when you undertake tailored courses with us, and to meet specific legal and regulatory requirements which apply to our academy as a learning centre. Access to your personal information helps us to help you in a more personal way.

We also use your personal information to carry out analysis and market research, and to carry out marketing including targeted online advertising to keep you informed of our course. We may therefore send you status updates and course communications.

The above will help us to improve our websites, products and courses, and will also assist with our management and administrative objectives.

When will we send marketing information to you?

When we collect information directly from you, we may ask you if you wish to opt out of receiving our marketing communications. Please be aware that we do also sometimes send marketing communications to promote a third party's products and courses, such as those third party products that we use during courses, as well as our own.

We may ask if you consent to receiving marketing communications from other members of our group of companies, or from third parties practitioners. We will always respect your choice as to what communications you wish to receive, and how these are sent.

Can you change what marketing communications you receive and how you receive them?

Yes, you can. If you would no longer like to be sent marketing or other communications, you can change your mind and let us know at any time by phoning or emailing the academy via the contact details below.

In addition, each marketing communication we send by email will also have the above contact details for you to unsubscribe should you wish, and this will allow you to stop you receiving any further marketing emails. You may also stop any further text messages by replying with the word 'STOP'.

Please note that if you tell us that you do not wish to be sent further marketing communications, you will still receive course notice communications (as described above), as these are necessary to confirm your course booking, or to provide you with an update on its status. Please note that if you ask us to stop sending marketing communications, we may need to retain your personal information for the purposes of indicating that you do not want to receive such marketing communications.

What is the legal basis for us using your personal information?

The Vestfold Hudakademi will only process your personal information where we have a legal basis to do so and this will depend on our reason/s for collecting and needing to use your information. We may need to use your information so that we can process your course booking, fulfil your tuition needs and recommend programs for you. It is also in Vestfold Hudakademi's legitimate interests as an academy to use your personal information to operate and improve our business as a training provider or to comply with a legal obligation. In doing so we aim to protect your vital interests or those of another person.

How long do we keep your personal information?

We will keep your information for as long as we need it for the purpose it is being processed for. For example, where you book a course with us we will keep the information related to your booking, so that we can fulfil the specific course arrangements you require. After that, we will keep the information for a period which enables us to manage or respond to any complaints, queries or concerns that you may have relating to the course. The information may also be retained so that we

can continue to improve your delegate experience with us and to ensure that you receive all necessary further information.

Should there no longer be a legal, business or client need for the information to be retained, we will actively review the information and delete it securely, or in some cases anonymise it. If you stop interacting with us as a delegate, we will remove or anonymise your information after 7 years.

Performance of a course booking with you

It will be necessary for Vestfold Hudakademi to use your personal information to complete a course booking you have made with us. For example, we will need to use information such as your contact details and payment information to provide you with the course or any extended learning program you have requested and paid for.

As a commercial academy and learning provider the Vestfold Hudakademi has a legitimate business interest to use the personal information we collect to offer an effective service and carry out our business. There are also situations where the Vestfold Hudakademi is subject to a legal obligation and needs to use your personal information to comply with those obligations.

To protect the vital interest of you or another person There are situations where we may need to use your personal information to protect the vital interests of you or another person. Alternatively, we may collect and use your personal information where you have given your specific consent to us doing so. If the basis of our processing your data is consent to marketing, you can withdraw your consent to such processing at any time, including by email or by phoning us. However, if you withdraw your full consent, in some circumstances, it may mean we will not be able to provide all or parts of the courses that you have requested from us.

Who do we share your personal information with?

Your personal information may be shared with the companies within our group, which includes Scandinavian Skincare Academy UK. For more details about our group please visit the web site of our sister company at www.scandinavianskincare.com. We may share information with our group, so they can assist us in providing courses to you and to understand more about you. For example, if you have purchased products, treatments or equipment with one of the other companies in the group, we may use this information to understand more about the type of services you are likely to be interested in in addition to the courses.

You will only be sent marketing emails from other companies within our group where you have provided your consent to those companies. We may also disclose your personal information to the following third parties for the purpose described here:

1. Credit and charge card companies, credit reference agencies and anti-fraud screening service providers to process payments and (where necessary) to carry out fraud-screening.

2. In response to a valid, legal request from Government and law enforcement agencies.
3. Third party service providers we are using to provide services that involve data processing, for example, to carry out payment transactions and marketing initiatives.
4. Third parties, such as the courts of law, police and regulatory authorities, to protect our rights, property, or the safety of our clients, team and assets. Please note that we do not sell personal information to third parties, and we will only allow third parties to send you marketing information if we have your consent to do so.

Requesting a copy of your personal information

Under the UK Data Protection Act 1998, you are fully entitled to request a copy of any personal data about you which is held by Vestfold Hudakademi and there is no fee for this request. The request must be in writing and must contain the following:

1. Your name and postal address
2. Details of your request
3. Any details which may help us locate the information which is the subject of your request, for example: course details and dates.
4. A photocopy of your passport or driving licence, so that we can verify your identity.
5. Your signature and the date of the request.

If you are applying on behalf of another person then signed authority from the individual is required.

Please send your request to: Vestfold Hudakademi AS, Rådhusgata 11, 3211 Sandefjord, Norway.

What are your legal rights in respect of the personal information that we hold about you?

Under data protection laws in the European Union and the UK, you have specific rights in relation to your own personal information. Responses to exercise your rights will be provided within one month and generally there is no fee for making these requests. However, depending on the right you wish to exercise, and the nature of the personal information involved, there may be legal reasons why we cannot grant your request.

Your rights include the following:

- You may request us to stop sending you marketing. If you do so we will no longer be able to send you marketing communications. However, if you subsequently book a course with us we will need to send you communications about the courses you have booked to use. These communications will help

you get the most from the courses we provide and may also contain options and other details about the courses you will be having.

- You may request us to stop using your personal information where we are doing so under legitimate interests unless it is needed for dealing with legal claims or we have other compelling legitimate reasons that override your rights.
- You may request us to stop processing of your personal information for marketing purposes.
- You may access the personal information we hold on you.
- You may ask us to correct your personal information if that information is inaccurate.
- You may ask for personal information which identifies you to be erased (or forgotten). To do this we will remove the information that identifies you from the data we hold in our active systems ('anonymise'). However, a separate and restricted copy of the identifying information will be kept for 7 years to meet the obligations we have to law enforcement, national authorities and legal proceedings. We may need to retain certain elements that relate to a contract between you and the Vestfold Hudakademi because we need it for our own legal and auditing purposes. A record of your request including the personal information you supplied will be retained in the application used to carry this out for 3 years. In some circumstances it may mean we will not be able to provide all or parts of the course/s you have requested from us in relation to previous course bookings or retain any preferences you have previously shared with us. We cannot erase your personal information if you have either had a course with us in the past 13 months or you hold a forward booking for a course with us. For Legal reasons, we need to keep information linked to these courses. You may come back to us once this time period has passed and submit a request. We cannot erase your personal information if we have identified that you either have an open complaint with us or we hold a previous case for you within the past 6 years. We are required to retain this information in case there is a need to re-open the complaint.

How can you exercise your legal rights and change how we use your data?

If you wish to change how we use your personal information, please contact us at the contact details below.

We will ask for some information to identify you, which will only be used to process your request. We will verify your identify via email before processing your request.

Accessing your personal information If you wish to receive a copy of your information, you can make your request in writing and include the following information with your request:

- your name and postal address
- details of your request
- a photocopy of your passport or driving licence, so that we can verify your identity your signature and the date of the request

- if you are applying on behalf of another person then signed authority from the individual is required
- any details which may help us locate the information which is the subject of your request, for example, course details and dates.

How will we inform you of changes to this Privacy Policy?

We are committed to protecting and respecting your privacy and we will continue to do so in any future changes we make to this Privacy Policy. Updated versions of this Privacy Policy will be published on www.vestfoldhudakademi.no.

This new Privacy Policy came into effect on 22 May 2018 and applies to all information we process about you in connection with your relationship with us as a delegate or potential delegate. Please write to us if you would like to find out more about any matters as outlined above.