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## TMS Privacy Policy

Avanti Wind Systems SL ("**Avanti**") is part of Alimak Group, a global leader in vertical access solutions with customers in various industries including the wind and construction industries. Avanti is committed to building and maintaining trustworthy business relations. This commitment includes processing your personal data in compliance with the requirements of the General Data Protection Regulation ("**GDPR**"), Regulation (EU) 2016/679.

This **Avanti Training Management System Privacy Policy** (the "**Policy**") sets out the basis on which Avanti will process the personal data it collects when you engage with Avanti training services via various channels, including our websites, apps, and service support. Avanti collects, stores, and shares your personal data only to the extent necessary to the efficient administration of the Avanti training services.

This Policy sets out the type of personal data Avanti handles, processes, transfers, and stores when you use:

- 1) the Avanti Academy Application ("**Avanti App**") including but not limited to documentation, images and training certificates uploaded by Avanti App Participant Users when the documentation and training certificates are external to the TMS,
- 2) the Avanti Training Management System ("**TMS**").

Uploading of any external documentation (not issued by Avanti or Alimak Group) to the Avanti App is solely for the purpose of managing documentation. Avanti/Alimak Group does not provide any approval of such documentation. The responsibility for validating the documentation lies solely with the app user.

## Avanti Training Management System ("**TMS**")

The TMS is designed to enable customers and persons responsible for training departments to verify current and valid training records of Participant Users who have completed Avanti training and are registered in the TMS database at <http://alimaktraining.com> as a Participant User or an Organizational User.

## Participant Users' Personal Data in TMS and Avanti App

When you register to the TMS database as a Participant User, Avanti collects the following personal data:

- Your e-mail address
- Personal Profile Image
- Your full name as written in your passport
- Your employee number or date of birth
- Your Training ID, which is generated upon registration
- Your purchase information, such as your details as specified above, company name (if provided), physical address, your order information (such as course name and date of purchase).

### **Organizational Users' Personal Data in TMS**

You are an Organizational User when you engage with Avanti training services on behalf of your organization. When you register to the TMS database as an Organizational User, Avanti collects the following personal data:

- Your job title
- Your full name as written in your passport
- Your e-mail address
- Your work phone number
- The name of the organization that employs you
- The address of your employer
- The CVR/VAT number of the organization

### **Purpose and Use of your personal data**

Avanti collects and processes your personal data based on your consent, if at least one of the below-mentioned purposes applies:

- For registration purposes, reminders, contact details and issuance of training certificates.
- When handling your purchase orders for training.
- When providing you with relevant training.
- When providing you with customer services, handling your requests or complaints and providing you with online support, including notifications about certificate expiration.
- When conducting analytics and statistics on training type, date, and frequency of training.
- When processing your feedback regarding training experiences.
- For audit purposes or in defense of legal claims.

As a Participant or Organizational User, your e-mail address is never shared with anyone outside of the Alimak Group. It is used solely for notifying you of changes to your profile, password retrieval or safety-related information from TMS.

### **Data Processors**

Avanti uses external companies as Data Processors and has entered into a Data Processing Agreements to ensure that your personal data is processed within the European Union (EU)/ European Economic Area (EEA). These Data Processors are prohibited from transferring your personal data to non- EU/EEA countries (third countries) unless those countries are deemed to have an adequate level of data protection as determined by the European Commission.

### **Disclosure of your personal data to third parties**

Avanti shares your personal data collected and valid training history with representatives from your own organization and other companies within Alimak Group.

Except as stated above, Avanti does not share your personal data with any third party or with companies, organizations and individuals outside the Alimak Group, unless you consent to such disclosure or it is required by law, regulators, public authorities (in particular supervisory authorities), relevant accredited organizations, court orders or unless necessary as part of the establishment, exercise or defense of legal claims, e.g. towards legal representation.

### **Retention and Deletion of Personal Data**

You have the right to contact Avanti and request a deletion of your personal data. However, please note that if your personal data is deleted, all associated certificates will be invalidated, and they will no longer serve as proof of your training qualifications. If no such request is made, Avanti will retain your information for as long as it is necessary for the purposes for which it was collected.

The retention period depends on the specific purposes for which we collect and use your data. Certificates and all related information are stored in case they need to be retrieved as proof of your training qualification. As a Participant User, your personal data and login will be deleted 10 years after the most recent certificate has expired.

Once personal data and logs are deleted due to retention period expiring, access to any Avanti training account (TMS and Avanti Academy application) will be removed, and all external documentation uploaded to, for example, the Avanti App will be deleted.

Organizational User data collected is stored for the purposes listed for Organizational Users and is retained for up to 10 years after the expiration of the most recently employee certificate.

### **Your Rights**

Under the GDPR you are entitled to:

- withdraw your consent (to the extent the processing is based on your consent)
- object to our processing of your data
- ask for a copy of the data we hold about you
- ask for the data to be transferred to another entity (so-called data portability)
- ask for the data to be corrected or restricted
- ask for the data to be deleted

You also have a right to submit a complaint to your local data protection authority should you have concerns about how we use your personal data. However, we would appreciate it if you reached out and raised your concerns directly with us first to allow us to try to resolve them together. You can find our contact information below.

### **Contact Information**

If you have any questions on how we use your personal data, you can contact us at [privacy@alimakgroup.com](mailto:privacy@alimakgroup.com).