

Privacy Policy

Information About Us

PANTA RAY S.r.l. understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

PANTA RAY S.r.l.

A sole shareholder company

Registered in Italy under company number MI – 1893684.

Registered address: Via Antonia Pozzi, 4 – 20149 Milan (Italy).

Main trading address: Via Antonia Pozzi, 4 – 20149 Milan (Italy).

VAT number: IT06451450966

Email address: info@pantaray.eu

Telephone number: +39 02 36537250

Postal Address: Via Antonia Pozzi, 4 – 20149 Milan (Italy).

We are regulated by ISO 9001-2015

What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in the section '*What Personal Data Do You Collect?*', below.

What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in the section '*How Do I Contact You?*'.

b) The right to access the personal data we hold about you. The section '*How Do I Contact You?*' will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in the section '*How Do I Contact You?*' to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in the section '*How Do I Contact You?*' to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in the section '*How Do I Contact You?*'.
- i) Rights relating to automated decision-making and profiling. The below section '*How Do You Use My Personal Data?*' explains more about how we use your personal data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Data Protection Authority in your country.

What Personal Data Do You Collect?

We may collect the following personal data:

- First Name
- Last Name
- Business name and address
- Email address and Business telephone numbers
- Social media details
- Job title and profession
- Country of residence and spoken language
- Payment information
- Opinions on our training programs
- Comments uploaded to the PANTA RAY website

How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you (i.e. Registration Forms for training purpose), because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Improving, personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time by clicking the unsubscribe link at the bottom of our email communications or replying to the email address supplied on our postal mailings).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reasons for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Personal data of participants enrolled on training programs is retained for 1 year following the expiration date of a training program.
- Company name and contact data of existing customers is retained for 8 years following a contracted training program.
- Contact details and training/consulting preferences of potential customers is retained for the legitimate business interest of communicating PANTA RAY products and services, and is retained until it is either updated or consent to contact the recipient is withdrawn.
- Correspondence with existing customers is held in line with Europe legal requirements.

Do You Share My Personal Data?

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for the purposes of improving and communicating our products and services or for providing services to customers as part of an agreed training program. This includes our holding company and its subsidiaries and partners.

We may sometimes contract with the following third parties to supply products and services to you on our behalf. These may include diagnostic or psychometric testing or survey websites for the collection of learner opinions as part of a contracted learning program, or for the purposes of delivery or marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

- Printers and delivery companies located

- This data will be used to print and ship learning materials to participants or training venues as part of PANTA RAY training programs.
- Training Partner Companies located
 - This data will be used to implement training requirements under contracted PANTA RAY training programs.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in the section '*How Do I Contact You?*', below. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month (thirty days) of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months (ninety days) from the date we receive your request. You will be kept fully informed of our progress.

How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details: for the attention of PANTA RAY Compliance Officer:

Email address: info@pantaray.eu

Telephone number: +39 02 36537250

Postal Address: Via Antonia Pozzi, 4 – 20149 Milan (Italy).

Cookies

This Website may place and access certain first party cookies on your computer. First party cookies are those placed directly by via this Website and are used only by PANTA RAY. PANTA RAY uses cookies to improve your experience of using the Website and to improve our range of products

and services. PANTA RAY has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All cookies used by this Website are used in accordance with current Italian and EU Law.

Users will be presented with a pop-up message bar requesting your consent to set cookies. By giving your consent to the placing of cookies you are enabling PANTA RAY 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 the Website may not function fully or as intended.

This Website uses analytics services. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and the products and services offered through it.

The analytics services used by this Website use cookies to gather the required information. Certain of these cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these cookies and prevent future use of them by following the steps outlined below.

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.

You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.