

## **Introduction**

Dillon Productions Ltd. is a leading provider of video rich and interactive e/learning programmes and LMS solutions to a broad range of commercial sectors in Ireland. We are committed to protecting the privacy of our customers and employees and recognise our responsibilities to hold all personal information securely and confidentially.

Dillon and its hosting partners have created and adopted this Privacy Notice (“Notice”) to demonstrate our firm commitment to your privacy. This Notice applies to all our products and services and describes how we collect, use and share your personal information, and what your rights are. To fully understand your rights, we encourage you to read this Notice and to consult our Terms of Use.

## **Company Details**

Dillon Productions Ltd

Unit 2, Block D

Nutgrove Office Park

Rathfarnham

Dublin

DI4 H262

## **Personal data protection principles**

We adhere to the principles relating to Processing of Personal Data set out in the General Data Protection Regulation (GDPR) which require Personal Data to be:

1. Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
2. Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
4. Accurate and where necessary kept up to date (Accuracy).
5. Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
6. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
7. Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
8. Made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject’s Rights and Requests).

## **Purpose**

We process your personal information for the purpose of providing you with the Service.

This may include:

- Providing customer service and support;
- Communicating with you and direct marketing;
- Delivering content, training materials and communications via our eLearning platform;
- Production of bespoke eLearning materials;
- Improving the quality of the Service delivered;
- Complying with legal obligations, and resolving any disputes;

In most cases the legal basis for such processing is performance of a contract or legitimate interest. However, in certain cases the legal basis for such processing is that you have provided your explicit consent. In these cases, you have the right to withdraw your consent at any time. If we intend to process your personal information for any additional purpose(s), we will provide you with information on the other purpose(s) and seek your prior consent, as required by applicable law.

## **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our Service prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Definition of Personal Information**

Any information identifying a Data Subject or information relating to a Data Subject that Dillon Productions can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal data includes sensitive personal data and pseudonymised personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

## **Collection of Information**

Each time you use our Services, we collect information you provide to us and about your use of our Services as described below. For example, during your use of our Services you may provide additional personal information, complete some online learning or a test/questionnaire or submit other information to us which may be considered personal information.

To provide you with our Services, we may require certain information from you because such information is relevant to a specified purpose. The types of information that we require are described below.

Information you provide to us when accessing or using our Services. When you access or use our Service, we collect information you provide to us, including, but not limited to:

- Registration information. By registering with our Service, we will collect any information that you make available to us when accessing or using our Services. For example, we may collect your name, e-mail address, userID or company specific information.
- Communications with us. When you communicate with us in any way, such as e-mail or telephone, we will receive your contact information and any other information you choose to provide to us.
- Content and Activity tracking information. Delivery and tracking of content is a core part of our business and when you use our eLearning Platform your activity will be recorded. Such information may include the time spent studying a particular course, the score you received when taking a test or the answers you provided to a questionnaire.

Information about your use of our Services. We passively collect information about you when you use or access our Service. We will combine this information with information you give to us and information we collect about you. Examples of the types of information we collect include, but are not limited to:

- Log data. We collect log data about your use of our Service, which may include your IP address, IP data and the time of your access or use of our Service, page views, the referring URLs, and any other information about your activities on our Service.

## **Information Sharing**

We will share your personal information with third parties only in the ways that are described in this Privacy Notice.

- Third parties authorised by you. We will only disclose your personal information to a third party with your authorization.
- Third-party service providers. We may provide your personal information to companies that provide services to help us to provide our Services. These companies are authorised to use your personal information only as necessary to provide these services, based on our instructions and in compliance with this Privacy Notice and any other appropriate confidentiality and security measures. A full list of all third-party service providers is provided at the end of this notice.
- Compliance with legal obligations. We may also disclose your personal information as required by law, such as to comply with a summons or similar legal process; when we believe in good faith that disclosure is necessary to protect our rights; to protect your safety or the safety of others; to investigate fraud; or, to respond to a government request.

- Protection and safety of Dillon Productions and others. We are committed to providing a safe environment on our Service. We may disclose your personal information for purposes of: fraud prevention and detection; protecting the rights, property, and safety of Dillon Productions, you, or others; and, enforcing or applying our Terms of Use and other agreements, as required or permitted by law.

## **Data Retention**

We will retain your personal information, including Content Tracking information, for no longer than is necessary to provide the Service, and to comply with our legal obligations, resolve disputes, and enforce our agreements. At such time, we will securely and permanently dispose of your personal information according to recognised industry standards.

## **Security**

Our Services incorporate various security controls to protect against the loss, misuse and alteration of the personal information under our control. Dillon Productions will endeavour to use appropriate security controls including firewalls, monitoring and encryption where relevant.

However, no data transmission over the Internet or storage of data can be guaranteed as 100% secure. Consequently, we cannot ensure or warrant the security of any personal information you send or store with us, and you transfer and store such data at your own risk. You are also responsible for the security of your personal information by taking appropriate precautionary measures, such as keeping your account password confidential and using secure wireless connections.

## **Accessing Personal Information**

If you wish to access, correct, delete or update your personal information, restrict or object to processing or exercise a right to data portability, please email us at [support@dillonproductions.com](mailto:support@dillonproductions.com). We will respond to reasonable requests in accordance with relevant data protection laws.

## **Compliance with Regulatory Authorities**

We regularly review our compliance with this Notice and work with appropriate regulatory authorities regarding our processing of personal information when appropriate. If you have a complaint regarding the processing of your personal information, you have the right to lodge a complaint with the Data Protection Commissioner.

## **Third Party Service Providers**

Dillon Productions uses the following third-party service providers to help us to provide our services. These companies are authorized to process your personal information only as necessary to provide these services, based on our instructions and in compliance with this Privacy Notice and any other appropriate confidentiality and security measures.

Blacknight Internet Solutions Co Carlow <https://www.blacknight.com/>

LearnUpon Dublin <https://www.learnupon.com/>