

Castlebridge-Associates.com Privacy Statement

Identity

This website is owned and operated by BridgeCastle Information Management Ltd, trading as Castlebridge Associates, a company limited by shares and registered in the Republic of Ireland (registration number 473477). Throughout this document the company is referred to by its trading name, Castlebridge Associates. If you have queries or questions relating to this Privacy Statement you can contact us

Phone:	+353 53 910049
Email:	privacy@castlebridge-associates.com
Post:	BridgeCastle Information Management Ltd, trading as Castlebridge Associates 13 The Cloisters Castlebridge Wexford
Website	http://castlebridge-associates.com/policies/dp-contact-us

Our Data Protection Compliance Officer is our Managing Director (Taoiseach), Daragh O Brien (in line with our recommendations that good information governance starts from the top). He can be contacted directly by email at daragh@castlebridge-associates.com.

This privacy statement is reviewed on a 6 monthly basis and the views of site customers will be sought as part of that review process to ensure we are customer-focussed in our approach to managing your personal information.

Purpose

Personal data is captured on this site for the following purposes:

- To provide and control access to premium/paid content or services delivered through this site
- To allow registration for off-line training, coaching, mentoring or consulting services.
- To facilitate the purchase and delivery of products or services delivered through the website (i.e. the purchase of articles, training materials or other resources)
- The operation of marketing of products and services by way of subscription based email newsletters and other mechanisms in the normal course of business
- The use of facilities and services on the site to enable the management of projects with you or your organisation and the delivery of services to you or your organisation
- Statistical analysis of activity and usage of services delivered through the website.
- To facilitate the operation of web-based contact forms and communication initiated by site users to Castlebridge Associates via web forms.
- To allow site users to interact with the site through commenting on published content and similar activities.
- Segmentation of customers or site visitors by industry and/or company turnover or other similar corporate demographics for the purposes of targeting marketing or sales activities or research and development activities more effectively.

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Reference: policies/privacy-statement

Version: 1.0, February 2010

- To allow us to update you about terms and conditions of service, privacy policy changes and other administrative purposes.

Should other purposes be identified, this privacy statement will be updated to reflect these and the proposed changes will be communicated to you before being implemented to allow for comment and to give you the opportunity to opt-out if so desired.

Disclosure

Information will be disclosed to authorities for the purposes of investigation of a crime, under any of the grounds for valid disclosure detailed in the Data Protection Act, or as may be required by law from time to time. Personal data may also be disclosed to our hosting provider who acts as a Data Processor on our behalf as a result of their hosting our website.

From time to time Castlebridge Associates may run promotions with Professional Associations or with other companies in related fields of Information Management. If you have indicated that you are happy for your personal data to be disclosed in such a way (shared with 3rd parties) then we may disclose it. However, our default position on such collaborations is that we would send mailings on behalf of the promotion rather than sharing personal data. This may result in you receiving multiple communications about the same promotion however.

Your personal data will also be disclosed if Castlebridge Associates is purchased by or merges with another company. In this event we will notify you by email and via the website of the transfer and any revised Privacy policy that may be implemented as part of that transaction. We will allow you to opt-out of having your information shared in this way or to specify revised privacy preferences at that time.

Castlebridge Associates may, from time to time, establish subsidiary companies either alone or in partnership with other companies or agencies. Should this happen, your personal data may be disclosed to such subsidiaries but not to any other entities (i.e. If we set up a joint venture with another company we would share your personal data with the joint venture but we would not permit the other company to have that data other than for the purposes of the joint venture).

Castlebridge Associates may enter into joint venture partnership agreements with other companies or agencies from time to time. We may share your personal data for the purposes of promoting any services of that joint venture which would be of interest to you. Your personal data will not be shared directly with any other company or agency and its use will be specifically for the purposes of that joint venture and will be defined in any contracts or agreements governing such a venture.

In order to deliver our services, Castlebridge Associates makes use of a number of 3rd party applications to which data about you may be disclosed. In some cases this disclosure takes place automatically via an interface between Castlebridge-Associates.com and 3rd party service. In other instances, the personal data will be manually transferred by our team or you will be provided with a separate registration page for the 3rd party service on the Castlebridge-Associates.com website.

Note that in some cases, the use of 3rd party tools requires the transfer of data outside of the EEA. We have satisfied ourselves that the service providers we have selected meet the highest possible standards of Data Protection principles which form part of our contract with them. Each of these 3rd party services will have their own privacy policies. The table below sets out the 3rd party platforms used by us, why we use them, and a link to their privacy policy.

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Service	Our Purpose	Their Privacy Policy
Mailchimp.com	We use Mailchimp as our email marketing engine. It handles email campaign tracking and other functions for us to ensure we don't spam.	Mailchimp Privacy Statement
Litmos.com	Litmos is a web-based e-learning platform which we use to host the Castlebridge Associates Virtual Campus.	Litmos Privacy Statement
Paypal	We use paypal as a payment processor for some of our services	Paypal Privacy Statement

Should we identify issues with the ability of our 3rd party service providers to adequately protect personal data to our satisfaction or the satisfaction of our customers, our policy is to immediately seek an alternative provider. In such cases, your personal data would need to be transferred to the new service provider to ensure you can still access or avail of the various services.

In addition, disclosure of personal data to professional certification/accreditation bodies may be required for certain courses of education which might be offered by Castlebridge Associates. In most cases, this will be a disclosure pursuant to the delivery by us on a contractual obligation to you and only the minimum personal data required to meet that obligation will be transferred. Where the disclosure is other than as a result of a contractual obligation (e.g. you hadn't expressed a goal of achieving a particular professional award) we will seek your consent for disclosure.

Right of Access

On request, we supply copies of your personal data which you may have supplied via this website. If you wish to obtain such copies, you must write to us either by email (privacy@castlebridge-associates.com) or at the address below. You should include any personal identifiers which you supplied earlier via the website (e.g. Name; address; phone number; e-mail address). Your request will be dealt with as soon as possible and will take not more than 40 calendar days to process.

A processing fee of €5.00 will be charged for requests. This may be waived at the discretion of the Data Controller.

Right of rectification or erasure

If you discover that we hold inaccurate information about you, you can request that we make a correction. Such a request must be in writing or via e-mail. If you are a registered user of the site you will be able to correct certain data yourself via the website.

In certain circumstance you may also request that data which you have supplied via the website be deleted. If you wish to request a deletion, you would generally be expected to identify some contravention of data protection law in the manner in which we have processed the data concerned.

Extent of data being processed

In general, the data which we will be processing relating to you will extend to the following:

- Your name
- Email address
- Contact telephone numbers (including mobile phone)
- Your postal address
- Website address(s)
- Details about your company or business
- Membership of professional bodies
- The industry you are working in.

Not all information will be processed for all purposes and for most purposes, your name, email address and contact telephone number will be used.

For any segmentation analysis, we will use information provided by you about your company or organisation along with other publicly available information about your business/organisation to define segments and derive possible opportunities for Castlebridge Associates to assist you in improving your business.

For certain situations, such as processing your application for specific accredited courses which we may from time to time offer, we may be required to process information about your previous education and/or work experience and your PPSN. Where such information is to be processed it is being done so in the exercise of a contractual obligation. If you do not wish to provide that information we will not be in a position to accept your application for such courses.

For interactions with the website such as leaving comments on articles or blog posts or engaging in discussions or debates via the various forum we might offer, the minimum personal data required will be your email address. You may provide a website URL and a user name as well.

Right to refuse cookies

This website uses "cookies". A cookie is a little piece of data stored by the browser on the hard drive of your computer, at the request of our server. Cookies contain information that is transferred to your computer's hard drive. On revisiting Castlebridge-Associates.com, our server will recognise the cookie, giving us information about your last visit. We may use cookies (including flash cookies) to deliver content specific to your interests and to save your personal preferences so you do not have to re-enter them each time you connect to the Castlebridge Associates Website - our cookies are not available to other websites. Cookies help us to improve our website and to deliver a better and more personalised service. They enable us:

1. to estimate our audience size and usage pattern;
2. to store information about your preferences, and so allow us to customise the site according to your individual interests; and
3. to speed up your use of the website.

You are always free to decline our cookies, if your browser permits, by activating the setting on your browser which allows you to refuse the setting of cookies. You are always free to ask your browser to indicate when a cookie is being sent. You can also delete cookie files from your computer at your discretion. Note that if you decline our cookies or ask for notification each time a cookie is being sent, this may affect your use of the Castlebridge Associates Website. For information on how to control your cookies go to www.allaboutcookies.org.

Security

We take security seriously and employ appropriate physical and technical measures to ensure we keep your personal data as safe as possible. These measures include staff training and awareness (after all, that is our business), the use of encryption software to keep any copies of personal data which might be in the possession of staff safe, and other measures to ensure a strong company culture that recognises that we hold your data on trust and trust is the cornerstone of our business.

As advocates of continuous improvement, the Castlebridge Associates team keep our security and other policies and practices under review and we have a formal 6 monthly review gate for our policies and other measures so we can plan and execute improvements.

Accurate, complete and up-to-date

Data Protection and Information Quality go hand in hand.

Castlebridge Associates is committed to only holding accurate and up-to-date information that is as complete as our customers want it to be. We approach this in two ways:

1. Things you can do:

If you find we are holding information about you which is inaccurate, incomplete or out of date, you can contact us at privacy@castlebridge-associates.com and we will make the necessary corrections.

In most cases, you will be able to make the necessary corrections and updates yourself via the Castlebridge-Associates.com website by editing your user profile.

So, if you are changing job or moving address or have gotten a new email address or mobile phone, we endeavour to make it as easy as possible for you to update that information.

2. Things that we do:

- Castlebridge Associates will occasionally profile personal data using a leading Data Quality management software tool to identify inconsistencies in data (like a Mr Jane Doe), data which has not been amended or updated recently, incomplete data, duplicate data or other information quality issues. We will use the output of that profiling to take remedial actions such as contacting you to confirm the details you have provided or seeking clarification.
- On a quarterly basis we will contact a representative sample of the people we hold personal data about to verify the accuracy of the data they have provided.
- Castlebridge Associates will also keep all processes and functions of the website and the business under review to remove barriers to us effectively managing the quality of the information you provide to us, including our Data Protection obligations.

Adequate, relevant, not excessive

Part of effective Information Asset Management is ensuring that you have the right information at the right time for the right purpose.

Under this heading, Castlebridge Associates' policy is to only capture and hold the minimum amount of information required to enable us to deliver products and services to our customers and website visitors.

We keep our processes and objectives under review to ensure that we are achieving this aim.

Retention

We keep our retention of data under constant review to ensure we are not holding data for longer than we need to. Where we believe that data is no longer needed we will either delete the data or anonymise or summarise it such that the personal data is removed but data is still available for statistical purposes.

- Any user profiles created on the site which are not activated after 6 months will be deleted.
- Any user profiles created on the site which are activated but are not accessed after 12 months will be deleted.
- Any user profiles created on the site which have had no activity in 18 months will be deleted.

Our email list management software automatically removes people from mailing lists when they unsubscribe.

Accounts created on our e-learning platform are kept under review and will be deleted on a timescale similar to that applied to user profiles within the Castlebridge-Associates.com website itself.

Complaint resolution mechanism

If you have any questions or queries about this Privacy Statement, or would like to suggest improvements or amendments, you can contact us by email at privacy@castlebridge-associates.com.