



Global
Business
Academy

Privacy statement
september 2018

PRIVACY STATEMENT

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1. WHAT IS THIS PRIVACY STATEMENT?

The aim of this privacy statement is to explain how we collect and process your personal data, in an easy and transparent way. This privacy statement is relevant for the following people:

1. All former, current and future learners of the Global Business Academy platform
2. Every person that signed up for the newsletter online

What we mean by personal data is all data that we collect that can be linked back to you, such as your name and email address, year of birth etc. You share this information with us when you register for the newsletter (name and email) or when you enter the platform as a learner.

What we mean by processing is everything we do with your data, like gathering, saving, using, sharing or deleting.

2. WHICH DATA DO WE COLLECT FROM YOU AND ABOUT YOU?

We collect data for two types of purposes:

1. Data for the Newsletter (name, location and email address)

A. Learners: our learners can opt in for our newsletter at the start of the e-learning or via our website. Our newsletter contains new learnings, interviews, information about Global Business Academy and other fun facts to keep your knowledge up to date. Learners can unsubscribe at any time.

B. Interested individuals: when an interested person self-registers for our newsletter, they receive the same newsletter as our learners. Again, recipients can unsubscribe at any time.

2. Data during learning

During the learning journey, we collect data in various ways:

[2A. Profile details](#)

When you first log in to the website, you are asked to fill in information. This includes:

- your name, age, gender, nationality
- details of the organisation that you work for (origin, industry and your seniority)
- the country, region and city that you live in

[2B: Objectives](#)

After completing your profile, you will be asked to enter your objectives: what is it you want to achieve for India? For which goals do you want to develop a strategy during your learning?

[2C: Interactive questions](#)

During the course you will be asked to respond to many interactive questions. After entering your response, you can compare your opinion to those of 800 Indian business professionals so that you can see how your perceptions differ (or not).

[2D: Self-learning](#)

Each learning block ends with self-learning where you reflect on what you have learnt, how it's relevant to your own work environment and what you need to implement in your work to reach your objectives.

[2E: Coaching](#)

Most learners receive additional coaching from our experienced consultants as part of our program. They will help you to create the best strategy to reach your goals. These sessions are at the start, during and after your learning.

[2F: Online behaviour](#)

We capture technical data such as the IP-address of your computer, the visited learning webpages, the internet browser you use and the duration of a visit/session. With this data our administrators can perform website analysis and manage the website, for instance by resolving technical difficulties or improving the accessibility of certain part of the website. For this purpose cookies are used as well.

3. WHAT DO WE DO WITH YOUR PERSONAL DATA?

1. Data for the Newsletter

We send a quarterly newsletter, that's it. We do not share our database with any third parties outside Global Business Academy.

2. Data during learning

2A & 2C: Profile details and its use in the interactive questions

The purpose of Global Business Academy's platform is mutual learning: you learn from other people's opinion and they learn from yours – all anonymised – by understanding how your perceptions on the same situations differ.

Western learners see the aggregated answers of the Indian professionals and vice versa. To make the learning more valuable and relevant, learners can narrow down the answers by using filters. For example: Delhi, female, 30-40, senior manager, Indian multinational. Or: American, Houston, 20-30, junior manager, American SME. This helps each learner to compare their answer with the answers that are most relevant to his/her work situation.

Your data is always shown anonymously, as part of a group: for example Female, or an age group, or inhabitants of New York. Answers are never linked to a name, surname, email address or company. No one can see this, including Global Business Academy.

Please note that we capture industry information, but do not include this in the filters. We will add this to the filters once we have enough data per filter for it to be representative and anonymous.

2B & 2D: Objectives and Self-learning

The Self Learning is for your eyes only. It cannot be seen, accessed or used by Global Business Academy or your employer. You can download and share your own self-learning (Working Document) with your manager or colleagues: you are in charge of this personal data. Your employer has of course decided to buy this program because they want to see an improvement in performance with India. Therefore, they may track an improvement in company performance and KPI's (such as better management of project time lines, increased quality of output from India, improved customer satisfaction and so forth) to measure the effectiveness of the program.

2E: Coaching

During the three coaching sessions the consultants will capture information regarding your objectives, the challenges you face that prevent you from reaching the objectives, the insights you gained and the strategy you created. This is co-created with yourself with the aim of helping you to reach your strategic goals.

2F: Online behaviour

The data information collected and stored by GBA during your training session is used for the technical and functional management of the website. It enables us to deliver the functionalities of the training platform and deliver the training to you in the most effective way. We may also use your personal data to address fraud, security or technical issues and to protect your and our safety, rights and property. This may include investigating suspicious activities or violations of our terms.

4. WITH WHOM DO WE SHARE YOUR DATA AND WHY?

1. Data for the Newsletter

We do not share our database with anyone outside Global Business Academy.

2. Data during learning

2A & 2C: Profile details and its use in the interactive questions

We share this data in two ways:

A. Above a minimum of 50 users, the employer may request a report showing the aggregated research results. This means that the results are not related to individual users in any way. The minimum of 100 users is there to protect the employee's privacy, so the employer cannot work out individual answers based on the filters.

B. We perform research into market trends through statistical analysis. We look at the aggregated data to uncover macro trends over time between generations or countries. Again, Global Business Academy will see and use your answers impersonalised. These aggregated market trends may be shared in research reports, in our newsletters, in keynote speeches, online etc.

2B & 2D: Objectives and Self-learning

This data you enter cannot be accessed by anyone but yourself. Global Business Academy can only see whether the Self Learning is used or not. Upon request of your employer, we may share whether you utilise the Self Learning functionality.

2E: Coaching

The key information (objectives, issues and strategy) that are discussed during the coaching may be shared with your direct manager and/or stakeholders upon their request. They are investing in you and in this program to enhance business results, so it is important for them to see the outcome of your learning journey.

2F: Online behaviour

We share this data in two ways:

A. The employer has the right to see usage data: whether employees have logged in or not and where they are in the program. Upon request by the employer, a report with the name, surname and usage will be provided.

B. We use the results of such research to evaluate our current websites and services and to adapt our services and marketing to new developments. To generate these informational reports, we process usage data such as the time and data of your successful logins and which services / webpages you view the results in these reports are purely statistical and are not used to identify you.

GENERAL NOTE:

Only those members of our staff who need the access to perform their job shall have access to the personal data and only as far as needed for doing that job. From time to time we may need to make personal data available to third parties that we use for certain processing, such as the hosting of the website or for other services, e.g. service providers (companies) that provide products and services to Global Business Academy such as payment providers, IT system suppliers, professional advisors (such as accountants, auditors, or lawyers) or public and governmental authorities. As far as these third parties have access to personal data, we have taken the required measures to ensure that they will only use your personal data for the relevant processing as mentioned above. Global Business Academy will not provide your personal data to any other third parties, unless there is a legal obligation to do so.

5. WHAT ARE YOUR RIGHTS AND HOW DO WE TREAT THIS?

Right to access

You have the right to request an overview of your personal data processed by or on behalf of Global Business Academy.

Right to rectification and restricted processing

If the personal data are incorrect, incomplete, or not processed by us in compliance with applicable law, you have the right to have your personal data rectified, deleted or the processing thereof restricted (as appropriate).

Right to object and for data portability

You have the right to object to the processing of your personal data (as appropriate) and the right to data portability. You can ask for transfer of your personal data. As part of such request, you may ask for your personal data to be provided back to you or transferred to another controller.

Right to withdraw consent

The employer has the right to see usage data: whether employees have logged in or not and where they are in the program. Upon request by the employer, a report with the name, surname and usage will be provided.

Right to erasure and right to be forgotten

You have the right to contact us after you completed the learning to delete the entire personal account so that all the answers, the working document and the profile details are deleted from our records. You can exercise your rights by contacting us using below details. Equally, your employer has the right to delete the employee's profile after the employee has left the company.

Right to file a complain

Should you not be satisfied with the way we have responded to your concerns you have the right to submit a complaint to us via privacy@globalbusiness.academy

You can also contact the data protection authority, the [Autoriteit Persoonsgegevens](#).

6. YOUR OBLIGATIONS TO PROVIDE DATA

During the learning we need you to provide data as it supports you in your learning experience and shows results for your employer. You may omit the following data:

- Your name and surname are only used for personal contact, such as re-setting your password, personalising the learning and newsletters. If you do not want to give your real name, that is fine.
- The Objectives and Self Learning are there to help you reflect on the purpose of the learning and enhance the outcome. If you prefer to complete this off-line, that is fine.

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

We treat your personal data strictly confidential and we take appropriate technical, physical and organizational measures to protect personal data from misuse or accidental, unlawful, or unauthorized destruction, loss, alternation, disclosure, acquisition or access, that are consistent with applicable privacy and data security laws and regulation. We will also require service providers to use appropriate measures to protect the confidentiality and security of personal data.

All information is stored server in one of the most secure data centres in the Netherlands that is [ISO 27001:2005](#).

All our consultants have signed Confidentiality Agreements. All data captured during these personal sessions is stored in separate secure environment. After you have completed your full learning program and, where requested, we have reported your progress with your manager and/or stakeholder (where applicable), all your data will be deleted.

We are currently investigating how we can delete your name, objectives and self-learning whilst keeping your answers to the interactive questions to further guarantee your privacy.

8. WHAT CAN YOU DO TO PROTECT YOUR PERSONAL DATA?

- You may provide a fake first and last name to protect your privacy (please do share this with your employer as they will see your progress reports). We have an offline version of the Objectives and the Self Learning working document. You may request this document so that you store this sensitive information on your personal computer only.
- Install anti-virus software, anti-spyware software and a firewall and keep them up to date.
- Keep your passwords strictly confidential and use strong passwords, i.e. avoid obvious combinations of letters and figures.
- Always be alert online and pay attention to unusual activity, such as a new website address or phishing emails requesting personal information.

9. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain all data described above for a maximum period of five years. The purpose for keeping the data for five years is for the mutual learning where all learners see the aggregated, anonymized answers of other learners. As mentioned above, we are working on a solution where we separate personal data from the interactive question data so that we can delete all your information with regards to name, surname, objectives, self-learning and usage data immediately after your learning.

10. HOW CAN YOU CONTACT US?

Email: privacy@globalbusiness.academy

Phone: +31 88 111 9333

11. APPLICABILITY OF THIS PRIVACY STATEMENT

This Privacy Statement is from Global Business Academy B.V. It is applicable for all Global Business Academy's subsidiaries in the Netherlands as well as overseas.

We may update this Privacy Statement from time to time to comply with further regulations and/or there have been changes to how Global Business Academy processes its data handling. When we do so, we will inform the employer and issue the new statement on our website as well as the online learning platform. This version is from September 2018.

Please contact us in case you have any questions or concerns about this Privacy Statement or our use of your personal data.

Email: privacy@globalbusiness.academy

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**"GLOBAL
TEAMWORK
HAS NEVER
BEEN
THIS EASY"**



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