



## Axeten Training Privacy Policy

### Introduction

Axeten Ltd is a UK registered Open Source Intelligence company, providing OSINT research, training services and products. Also, OSINT is known as III or i3, which stands for internet intelligence and investigations.

We are committed to providing quality services to you, and this policy outlines our ongoing obligations to you, in respect of how we manage personal information.

This policy details the collection, storage, use and disclosure of personal information, relating to the provision of a training service.

### Relevant Legislation

We comply with all relevant legislation, regulations and guidelines pertaining to access, use, storage, protection and disclosure of personal information. Specifically, Axeten is compliant with The Data Protection Act 2018 and EU Regulation 2016/679 (GDPR).

Please read all of our compliance documents provided at <https://www.axeten.com/documents>

### Confidentiality & Privacy

We do not sell or in any other way make available, to any other company or agency, other than Axeten Group companies that are wholly owned by Axeten shareholders, any of your personal information, with the exception of accommodation purchased on behalf of the delegate, to a relevant third part supplier. This might include first name and last name.

### Personal Information Collected

For the purpose of providing our training services to you, we shall collect and store the following personal information:-

- first name and last name, and;
- e-mail address.

For the purpose of providing our training services to you, we might collect and store:-

- your personal address, where applicable, so that we might raise a legally compliant invoice, and;
- information that is publicly available, or that which is disclosed in a signature file of an e-mail or otherwise disclosed to us by yourself, someone in your organisation or by some other persons by



way of a referral or recommendation (Please refer to the Deletion Policy section in the Axeten Security Policy), and;

- information about your business, that might include your position in the company and your publicly available network inside and outside the company. Where you are a self-employed customer, we might hold this same information, that is personal to you.

We do not collect other personal data, such as health, disability, race, etc. However, you might wish to make us aware of special circumstances, where it may be necessary to make reasonable adjustments at a venue, to provide for you, for example, special dietary requirements.

### Use of Personal Information

Where you choose to use our training services, you authorize Axeten to process personal information, so that we might provide our service to you.

We use your personal information to:-

- enter into, or perform, a contract with you, and;
- raise a legally compliant invoice, and;
- address the training delegates in a polite manner during the training, and;
- apply a name to a training certificate, and;
- send OSINT technology information newsletters, and;
- where required, make accommodation reservations on behalf of the delegate, so that your personal information shall be passed to a third party supplier, and;
- acquire feedback from the delegate. The feedback process does not require a name and an e-mail address. To allow for anonymity for each delegate, feedback forms may be distributed by the Customer coordinator.

### Storing Personal Information

The personal information that you provide to us, is stored in our Customer Relationship Management (CRM), on secure servers located in the EU.

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you.

For further information on our security plan and procedures, please read our Security Policy.



### Access to your Personal Information

You may access the personal information that we hold about you, which is stored in our CRM.

Upon request, we shall provide a login to the Axeten CRM, that shall display your personal information.

Where you wish to access the personal information that we hold about you, please contact us by e-mail on [compliance@qwarie.com](mailto:compliance@qwarie.com) and be tolerant of our vetting process, so that we are sure you are the authentic contact.

### Security of Personal Information

We take the threat of data breach seriously.

We employ security measures, consistent with best practice, to protect against unauthorised access to the personal information submitted to us.

For more information on our security policies and procedures, please read our Security Policy and Data Breach Policy.

### Disclosure and Transfer of Personal Information

Personal information may be disclosed:-

- where accommodation shall be purchased on behalf of the delegate, and;
- where we determine that disclosure of specific information is necessary to comply with the request of a law enforcement or regulatory agency, and;
- to comply with the processing of a reasonable legal action, and;
- to protect the interests or safety of our Company, and;
- in the event of a transfer of ownership, assets or a bankruptcy of our Company.

### Notification of Changes to this Policy

This policy shall be reviewed and updated annually, to reflect any changes to our privacy practices in compliance with prevailing legislation, best practice and technology enhancements.

Please check this policy regularly.



### References

To read and download our compliance documents, please go to <https://www.axeten.com/documents>

- Axeten Security Policy
- Axeten Data Breach Policy
- Axeten Research Privacy Policy
- Framework Data Processing Agreement
- Axeten Data Protection Compliance Statement
- Axeten Modern Slavery Policy