

## Privacy Policy

Three Mountains Learning Advisors is responsible for processing the personal data as described below in this privacy policy document.

### Contact us in privacy matters

Alaine Gloria Mugeni is our data protection and privacy officer. You can reach her at [agmugeni@threemountains.academy](mailto:agmugeni@threemountains.academy)

Three Mountains Learning Advisors processes personal data from three groups of people:

- 1) Employees
- 2) Participants in our courses
- 3) Subscribers to our newsletter

### From our employees and job applicants, we process the following data:

- Full names
- Address data
- Phone number
- E-mail address
- Bank account number (employees only)
- CV and results of performance reviews

### From participants of our courses, we process the following data:

- Full names
- Phone number
- E-mail address
- In the case of e-learning courses, we track and trace performance in Easy Generator

### From subscribers to our newsletter, we process the following data:

- Full names
- Phone number
- E-mail address
- Name of the organisation they work for

### From visitors to our website, we process the following data:

- IP address
- Device type
- Internet browser used
- Other information as gathered by Google Analytics

### Special and sensitive personal data that we process

Our website and/or service does not intend to collect any special or sensitive personal data, other than strictly necessary for the technical performance of our services. We cannot check the age of visitors. We therefore advise parents to be involved in the online activities of their children, to prevent data about children from being collected without parental consent. If you



are convinced that we have collected personal information about a minor without this permission, please contact our data protection officer and we will delete this information.

### **For what purpose and on what basis do we process personal data**

Three Mountains Learning Advisors processes your data for the following purposes:

- Handling your payment
- To be able to call or e-mail you if this is necessary to carry out our services
- Three Mountains Learning Advisors also processes personal data if we are legally obliged to do so, such as data that we need for our tax return.
- Job applicants, we save personal data in the recruitment process or when you give us consent to store the information you have given us during the recruitment process for future job opportunities

### **Automated decision making**

Three Mountains Learning Advisors does not make decisions based on automated processing on matters that can have (significant) consequences for people. These are decisions taken by computer programs or systems, without involving a person (for example, an employee of Three Mountains Learning Advisors).

### **How long do we keep personal data**

We use the legally permitted retention periods to share personal data with third parties. We review the necessity of the data stored regularly and erase any data when it is no longer needed for the purposes mentioned above in this privacy notice. For employees, we erase their personal data six months after they have left, except for email addresses and Telephone numbers.

### **Three Mountains Cookie Policy**

Cookies, or similar techniques, that we use.

A cookie is a small text file that is stored on your computer, tablet, or smartphone when you first visit this website. The only cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly and, for example, remember your preferred settings. We can also use this to optimise our website. You can opt out of cookies by setting your internet browser so that it no longer stores cookies. In addition, you can also delete all information previously saved via the settings of your browser.

### **Cookies that we use on our website**

We use the following cookies on our website:

- Google Analytics. We use Google Analytics for monitoring our website. Google places these cookies on your device. Google may also have access to Google Analytics cookies and data collected by them. Read more about Google Analytics cookies including their expiration date [here](#) and in general about Google's services [here](#).
- X. We use X for enabling the share button as well as user monitoring on our website. X places these cookies on your device. X may also have access to these cookies and data collected by them. Read more about X cookies [here](#).
- Facebook. We use Facebook to enable the share button as well as user monitoring on our website. Facebook places these cookies on your device. Facebook may also have



access to these cookies and data collected by them. Facebook uses this data to provide analytics services and target digital marketing. Read more about Facebook cookies [here](#).

- LinkedIn. We use LinkedIn for enabling the share button as well as user monitoring on our website. Read more about LinkedIn cookies [here](#).

## Complaints

Three Mountains Learning Advisors would also like to point out that you have the option of submitting a complaint to the national supervisory authority, the Data Protection Office ([complaint@dpo.gov.rw](mailto:complaint@dpo.gov.rw))

## How we secure personal data

Three Mountains Learning Advisors takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized changes. If you feel that your data is not properly secured or there are indications of misuse, please contact our data protection officer.

([agmugeni@threemountains.academy](mailto:agmugeni@threemountains.academy))

Three Mountains Learning Advisors does not store your data longer than is strictly necessary to achieve the purposes for which your data is collected.

Three Mountains Learning Advisors does not sell your information to third parties and will only provide it if this is necessary for the execution of our agreement with you or to comply with a legal obligation.

We conclude a processing agreement with companies that process your data on our behalf to ensure the same level of security and confidentiality of your data. Three Mountains Learning Advisors remains responsible for these processing operations.

## Your rights to view, modify or delete data.

You can send a request for access, correction, deletion, data transfer of your personal data or a request for withdrawal of your consent or objection to the processing of your personal data to our data protection officer. To ensure that the request for inspection has been made by you, we ask you to enclose a copy of your proof of identity with the request. We will respond to your request as quickly as possible but within four weeks.

Three Mountains Learning acts diligently to ensure that you can exercise your rights regarding the processing of your personal data.

- You have the right to view, correct, or delete your personal data.
- Right to withdraw your consent. Where the processing is based on consent given by you, you may withdraw such consent at any time by sending us such request at the email address mentioned above in this privacy notice
- Right to data portability. This means that you can submit a request to us to send the personal data we hold about you in a computer file to you or another organization mentioned by you.
- Right to object to the processing of your personal data. You may object to certain processing of your personal data if the processing is based on a legitimate interest of Three Mountains Learning Advisors (e.g., use of your personal data for marketing purposes) by sending us such a request at the email address mentioned above in this privacy notice.
- Right to restrict processing of personal data, unless it is necessary for the protection of the rights of others, or for public interest: The Law prescribes for restriction of



processing of a data subject's personal data. This may be enforced by the data subject themselves or NCSA for a given period of time

- Right to information. You have the right to request the data controller or data processor information relating to purposes of processing your personal data, a description of the personal data that the controller or processor holds, including data on third parties or categories of third parties who have access to the data subject's data.

