

# Privacy Policy of SSG Training and Consultancy

SSG Training and Consultancy collects some Personal Data from its Users.

## Owner and Data Controller

SSG Training and Consultancy Ltd  
Sigma House,  
Oak View Close  
Edginswell Park, Torquay, Devon  
TQ2 7FF

**Owner contact email:** info@ssg.co.uk

## Types of Data collected

Among the types of Personal Data that SSG Training and Consultancy collects, by itself or through third parties, there are: Trackers; Usage Data; Data communicated while using the service; first name; last name; phone number; company name; physical address; email address; ZIP/Postal code; city; username; password; profile picture; social media accounts ; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); device information; geography/region; number of Users; number of sessions; session duration; In-app purchases; Application opens; Application updates; launches; operating systems; language; session statistics; Universally unique identifier (UUID); clicks; interaction events; scroll-to-page interactions; country; time zone; mouse movements; diagnostic events; page events; custom events; layout details; positional information.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using SSG Training and Consultancy.

Unless specified otherwise, all Data requested by SSG Training and Consultancy is mandatory and failure to provide this Data may make it impossible for SSG Training and Consultancy to provide its services. In cases where SSG Training and Consultancy specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by SSG Training and Consultancy or by the owners of third-party services used by SSG Training and Consultancy serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through SSG Training and Consultancy.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of SSG Training and Consultancy (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Interaction with live chat platforms, Advertising, Interaction with external social networks and platforms, Tag Management, Contacting the User, Content performance and features testing (A/B testing), Registration and authentication, Hosting and backend infrastructure, Infrastructure monitoring, Handling payments, Displaying content from external platforms, Traffic optimisation and distribution, Managing support and contact requests and Heat mapping and session recording.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

## Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

### Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on SSG Training and Consultancy, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioural retargeting technique, i.e. displaying ads tailored to the User’s interests and behaviour, including those detected outside SSG Training and Consultancy. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section “How to opt-out of interest-based advertising” in this document.

### Google AdSense (Google Ireland Limited)

Google AdSense is an advertising service provided by Google Ireland Limited. This service uses the “DoubleClick” Cookie, which tracks use of SSG Training and Consultancy and User behavior concerning ads, products and services offered. Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

### Information about Google Ads Enhanced Conversions and Customer Match

If you provide consent to Advertising technologies, we may use Google Ads features such as Enhanced Conversions and Customer Match. For Enhanced Conversions, hashed identifiers derived from information you submit (e.g., email, phone or address) are sent to Google using one-way SHA-256 in order to measure ad conversions; unmatched data is discarded. For Customer Match, we may use your contact details to create or update advertising audiences, which allows us to show or exclude ads across Google properties. When doing so, we communicate your consent status (ad\_user\_data and ad\_personalization) as required by Google. These features are only activated after you have granted the relevant consent and you can withdraw this at any time through the Cookie settings. Google processes uploaded identifiers as our processor under its customer data terms and the EU User Consent Policy, but may also act as an independent controller for some advertising uses (see Google’s policies). We do not upload data relating to children under 13 or sensitive categories. Customer Match audiences automatically expire after 540 days unless refreshed. Where processing occurs outside the UK/EEA, appropriate safeguards apply, such as Google’s standard contractual clauses.

This processing constitutes:

- a Sale in California

- a Sale in California

## **Analytics**

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

### **Google Analytics (Universal Analytics) (Google Ireland Limited)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited (“Google”). Google utilises the Data collected to track and examine the use of SSG Training and Consultancy, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in the United States

### **Google Analytics for Firebase (for apps) (Google Ireland Limited)**

Google Analytics for Firebase (for apps) or Firebase Analytics is an analytics service provided by Google Ireland Limited. **In order to understand Google's use of Data, consult [Google's partner policy](#).**

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

SSG Training and Consultancy uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

Users may opt-out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase related sections of this privacy policy, if available.

Personal Data processed: Application opens; Application updates; device information; geography/region; In-app purchases; launches; number of sessions; number of Users; operating systems; session duration; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; geolocation data.

This processing constitutes:

- a Sale in California

### **Cloudflare Web Analytics (Cloudflare, Inc.)**

Cloudflare Web Analytics is an anonymized analytics service provided by Cloudflare, Inc. that gives the Owner insight into the use of SSG Training and Consultancy by Users without needing to identify them. Further information may be found [here](#) and within the service's privacy policy.

Personal Data processed: device information; language; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information; inferred information.

This processing constitutes:

- a Sale in California

## **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of SSG Training and Consultancy, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

## **Google Analytics Advertising Reporting Features (Google Ireland Limited)**

Google Analytics on SSG Training and Consultancy has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyse specific behaviour and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

- a Sale in California

## **Contacting the User**

### **Contact form (SSG Training and Consultancy)**

By completing the contact form with their information, the User authorises SSG Training and Consultancy to use these details to respond to the inquiries (like quotes, and any other requests).

Personal Data processed: city; company name; email address; first name; last name; phone number; physical address; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

### **Phone contact (SSG Training and Consultancy)**

Users that provided their phone number might be contacted for commercial or promotional purposes related to SSG Training and Consultancy, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of Personal Information collected according to CCPA: identifiers.

### **Mailing list or newsletter (SSG Training and Consultancy)**

By registering on the mailing list or for the newsletter, the User’s email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning SSG Training and Consultancy.

Your email address might also be added to this list as a result of signing up to SSG Training and Consultancy or after making a purchase.

Personal Data processed: city; company name; email address; first name; last name; phone number; physical address; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

## **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyse the User response concerning web traffic or behaviour regarding changes to the structure, text or any other component of SSG Training and Consultancy.

### **Firestore Remote Config (Google Ireland Limited)**

Firestore Remote Config is an A/B testing and configuration service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in California

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of SSG Training and Consultancy and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows SSG Training and Consultancy to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows SSG Training and Consultancy to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

## **OpenStreetMap Widget (OpenStreetMap Foundation )**

OpenStreetMap Widget is a maps visualisation service provided by OpenStreetMap Foundation that allows SSG Training and Consultancy to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United Kingdom – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

## **Handling payments**

Unless otherwise specified, SSG Training and Consultancy processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. SSG Training and Consultancy isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

## **Stripe (Stripe Inc)**

Stripe is a payment service provided by Stripe Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

## **Heat mapping and session recording**

Heat mapping services are used to display the areas of SSG Training and Consultancy that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour. Some of these services may record sessions and make them available for later visual playback.

## **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation. Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: clicks; country; custom events; device information; diagnostic events; interaction events; layout details; mouse movements; page events; positional information; scroll-to-page interactions; session duration; time zone; Trackers; Usage Data.

Place of processing: United Kingdom – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; internet information; geolocation data.

This processing constitutes:

- a Sale in the United States
- a Sharing in California
- Targeted Advertising in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

## **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable SSG Training and Consultancy to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of SSG Training and Consultancy.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Firestore Cloud Functions (Google Ireland Limited)**

Firestore Cloud Functions is a hosting and backend service provided by Google Ireland Limited.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; internet information.

### **Firestore Cloud Firestore (Google Ireland Limited)**

Firestore Cloud Firestore is a hosting and backend service provided by Google Ireland Limited.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; internet information.

### **Firestore Hosting (Google Ireland Limited)**

Firestore Hosting is a hosting service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

### **Firestore Realtime Database (Google Ireland Limited)**

Firestore Realtime Database is a hosting and backend service provided by Google Ireland Limited.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; internet information.

### **Amazon Web Services (AWS) (Amazon Web Services, Inc.)**

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

### **Infrastructure monitoring**

This type of service allows SSG Training and Consultancy to monitor the use and behaviour of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of SSG Training and Consultancy.

### **Firestore Performance Monitoring (Google Ireland Limited)**

Firestore Performance Monitoring is a monitoring service provided by Google Ireland Limited.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; internet information.

### **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of SSG Training and Consultancy.

The interaction and information obtained through SSG Training and Consultancy are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on SSG Training and Consultancy isn't being connected back to the User's profile.

### **X Post Button and Social Widgets (X Corp.)**

The X Post Button and Social Widgets are services allowing interaction with the X social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

### **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of SSG Training and Consultancy, in order to contact and be contacted by SSG Training and Consultancy's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

### **Olark Widget (Habla, Inc.)**

The Olark Widget is a service for interacting with the Olark live chat platform provided by Habla, Inc.

Personal Data processed: Data communicated while using the service; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

### **Managing support and contact requests**

This type of service allows SSG Training and Consultancy to manage support and contact requests received via email or by other means, such as the contact form. The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

### **Intercom (Intercom Software UK Limited)**

Intercom is an AI assistant platform provided by Intercom Software UK Limited that enhances the capabilities of the support and communication channels available on SSG Training and Consultancy by making use of artificial intelligence techniques.

Personal Data processed: email address; Trackers; Universally unique identifier (UUID); Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

- a Sale in California

### **Registration and authentication**

By registering or authenticating, Users allow SSG Training and Consultancy to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, SSG Training and Consultancy will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Firebase Authentication (Google Ireland Limited)**

Firebase Authentication is a registration and authentication service provided by Google Ireland Limited. To simplify the registration and authentication process, Firebase Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; password; phone number; profile picture; social media accounts ; username.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers; sensorial information.

This processing constitutes:

- a Sale in California

### **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on SSG Training and Consultancy in a centralised fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager (Google Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

### **Traffic optimisation and distribution**

This type of service allows SSG Training and Consultancy to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between SSG Training and Consultancy and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

### **Cloudflare (Cloudflare, Inc.)**

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through SSG Training and Consultancy, i.e., communication between SSG Training and Consultancy and the User's browser, while also allowing analytical data from SSG Training and Consultancy to be collected.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in California

## **Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## **Further information about the processing of Personal Data**

### **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by SSG Training and Consultancy depends on the payment system used.

## **Cookie Policy**

SSG Training and Consultancy uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## **Further Information for Users**

### **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Further information about retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## **The rights of Users based on the General Data Protection Regulation (GDPR)**

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Further information for Users in Switzerland**

This section applies to Users in Switzerland, and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy.

Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document.**

### **The rights of Users according to the Swiss Federal Act on Data Protection**

Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible, providing Users with the information required by law.

## **Further information for Users in Brazil**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running SSG Training and Consultancy and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal information“ as it is defined in the **LGPD**.

### **The grounds on which we process your personal information**

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymised personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

### **Categories of personal information processed**

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

### **Why we process your personal information**

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

## **Your Brazilian privacy rights, how to file a request and our response to your requests**

### **Your Brazilian privacy rights**

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymised information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects

of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

### **How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

### **How and when we will respond to your request**

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.

### **Transfer of personal information outside of Brazil permitted by the law**

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorised by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

### **Further information for Users in the United States**

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running SSG Training and Consultancy and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The information contained in this section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are residents in the following states: **California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana.**

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

### **Notice at collection**

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*

## Internet or other electronic network activity information

**Personal Information collected or disclosed:** Trackers, Usage Data, Data communicated while using the service, various types of Data as specified in the privacy policy of the service, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users, number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, language, session statistics, Universally unique identifier (UUID), email address, clicks, interaction events, scroll-to-page interactions, country, time zone, mouse movements, diagnostic events, page events, custom events, layout details, positional information

### Purposes:

- Analytics
- Interaction with live chat platforms
- Advertising
- Interaction with external social networks and platforms
- Tag Management
- Hosting and backend infrastructure
- Infrastructure monitoring
- Displaying content from external platforms
- Managing support and contact requests
- Heat mapping and session recording

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** : Yes

**Targeted Advertising:** : Yes

**Third-parties:** Google Ireland Limited, Habla, Inc., X Corp., Fonticons, Inc. , OpenStreetMap Foundation , Cloudflare, Inc., Intercom Software UK Limited, Microsoft Corporation

## Identifiers

**Personal Information collected or disclosed:** first name, last name, phone number, company name, physical address, email address, ZIP/Postal code, city, various types of Data as specified in the privacy policy of the service, profile picture, social media accounts , Usage Data, Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users, number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, Universally unique identifier (UUID), clicks, interaction events, scroll-to-page interactions, country, time zone, mouse movements, diagnostic events, page events, custom events, layout details, positional information

**Sensitive Personal Information collected or disclosed** : username, password

### Purposes:

- Contacting the User
- Content performance and features testing (A/B testing)
- Registration and authentication
- Hosting and backend infrastructure
- Infrastructure monitoring
- Analytics
- Handling payments
- Traffic optimisation and distribution
- Further information about Personal Data
- Managing support and contact requests
- Heat mapping and session recording

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** : Yes

**Targeted Advertising:** : Yes

**Third-parties:** Google Ireland Limited, Stripe Inc, Cloudflare, Inc., Amazon Web Services, Inc., Intercom Software UK Limited, Microsoft Corporation

**Service providers or contractors:** SSG Training and Consultancy

## Commercial information

**Personal Information collected or disclosed:** first name, last name, phone number, company name, physical address, email address, ZIP/Postal code, city, Trackers, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users, number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems

**Purposes:**

- Contacting the User
- Analytics

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google Ireland Limited

**Service providers or contractors:** SSG Training and Consultancy

### **Audio, electronic, visual, thermal, olfactory, or similar information**

**Personal Information collected or disclosed:** first name, last name, phone number, email address, profile picture, social media accounts

**Sensitive Personal Information collected or disclosed** ⓘ: username, password

**Purposes:**

- Registration and authentication

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google Ireland Limited

### **Geolocation data**

**Personal Information collected or disclosed:** Trackers, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users, number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, clicks, interaction events, scroll-to-page interactions, country, time zone, mouse movements, diagnostic events, page events, custom events, layout details, positional information

**Purposes:**

- Analytics
- Heat mapping and session recording

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google Ireland Limited, Microsoft Corporation

### **Inferences drawn from other personal information**

**Personal Information collected or disclosed:** language, Usage Data, device information

**Purposes:**

- Analytics

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Cloudflare, Inc.

ⓘ You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

**To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.**

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

## **What are the sources of the Personal Information we collect?**

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use SSG Training and Consultancy.

For example, you directly provide your Personal Information when you submit requests via any forms on SSG Training and Consultancy. You also provide Personal Information indirectly when you navigate SSG Training and Consultancy, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of SSG Training and Consultancy and features thereof.

## **Your privacy rights under US state laws**

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

## **Additional rights for Users residing in California**

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have:

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

## **Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana**

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and

processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer. In Maryland, your Sensitive Personal Information will be collected or processed only if strictly necessary to provide or maintain a specific product or service requested by you.

In Minnesota and Maryland Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

\* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible
- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

### **Additional rights for users residing in Utah and Iowa**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have:

- **The right to opt out** of the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

### **How to exercise your privacy rights under US state laws**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How to exercise your rights to opt out**

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on SSG Training and Consultancy.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of SSG Training and Consultancy or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

## **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, SSG Training and Consultancy may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## **System logs and maintenance**

For operation and maintenance purposes, SSG Training and Consultancy and any third-party services may collect files that record interaction with SSG Training and Consultancy (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within SSG Training and Consultancy and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### **Personal Data (or Data) / Personal Information (or Information)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Sensitive Personal Information**

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

### **Usage Data**

Information collected automatically through SSG Training and Consultancy (or third-party services employed in SSG Training and Consultancy), which can include: the IP addresses or domain names of the computers utilised by the Users who use SSG Training and Consultancy, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using SSG Training and Consultancy who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of SSG Training and Consultancy. The Data Controller, unless otherwise specified, is the Owner of SSG Training and Consultancy.

### **SSG Training and Consultancy (or this Application)**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by SSG Training and Consultancy as described in the relative terms (if available) and on this site/application.

### **Sale**

Sale means any exchange of Personal Information by the Owner to a **third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

### **Sharing**

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

### **Targeted advertising**

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

### **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to SSG Training and Consultancy, if not stated otherwise within this document.

Latest update: 21 January 2026