



Berlineaton Data & Privacy Policy

1. Introduction

This notice, provided by Berlin, Eaton & Associates Ltd. (referred to as “Berlineaton”, “we”, or “us”), is included here to advise clients and potential clients with whom we interact, how Berlineaton collects, uses, discloses and manages your data.

Berlineaton is a professional management consulting firm based in Victoria, BC. We work with clients across the world. We provide a variety of services to our Clients and other parties, including but not limited to strategy development and execution, primary and secondary market, sector, and best practice research, business process redesign, data analytics, executive coaching and leadership development. Our registered company address is 1202 – 732 Cormorant St., Victoria BC V8W 4A5. Our company phone number is 250-472-3767. For the purposes of this notice, Berlineaton is the Data Controller.

2. Definitions

Client – means a client of Berlineaton

Data Controller – means the body that determines the purposes for which and the manner in which any personal data are, or are to be, processed

Data Processor – means any person or entity (other than Berlineaton Personnel) who processes personal data on our behalf

Personal Data – means any information relating to an identified or identifiable natural person

Personnel - means any current, former or prospective employee, consultant, temporary worker, intern, other non-permanent employee, contractor or other personnel Processing,

Process – in relation to Personal Data means the obtaining, recording, adapting, structuring, retrieving, disclosing, using, transmitting, disseminating or otherwise making available or erasure and destruction of the data, whether or not by automated means

Special Categories of Personal Data – means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or a person’s sex life or sexual orientation.

3. How do we Collect Information from You?

In the course of our interaction with you we may collect Personal Data about you. Your Personal Data is provided to us in a number of different ways, including:

- directly from you when you provide it to us (for example when you correspond with us by mail, phone, email or website form)
- from the public domain, including via websites and networking platforms such as LinkedIn (insofar as you choose to make your profiles publicly visible)
- from third parties who provide it to us (for example colleagues in your organisation, peers in your sector).

Creation of personal data - to fulfil our obligations to you as a Client, we may also create Personal Data about you, such as notes from any meetings you attend with us.

Data you may provide about others - in some circumstances, you may provide us with Personal Data about other people (for example, you may suggest we contact another individual). In these instances, we rely on you to ensure that you have a lawful basis for providing such Personal Data to us.



4. What type of Information is Collected About You?

We only collect Personal Data relevant to the type of transactions you have with Berlineaton. The categories of Personal Data about you that we may Process include:

- personal information: title, first name, last name, preferred name
- contact details: work address, telephone numbers (work, mobile), work e-mail addresses, Skype address, LinkedIn profile, Twitter username.

5. How is your Personal Data Used?

Depending on your interaction with us, the purposes for which your Personal Data may be Processed may include:

- **providing our services to you** – including communicating by phone, text message, letter, email and website forms or by attending meetings with you; and otherwise communicating with you in order to deliver the above services
- **marketing communications** - informing you about news items, Berlineaton services, career opportunities, events and training courses that you may be interested in via email, telephone, letter, text message, social media, or in person
- **management of our business** – operation and management of our website, communication and IT systems, financial and sales processes record-keeping for health and safety purposes and compliance with our legal obligations, aggregated statistical analysis (we make every effort to ensure no Personal Data is disclosed in the latter)
- **improving our business** – consulting you via email, telephone, online survey, social media, or in person to obtain your views on relevant topics such as improvements to existing services and potential new services
- **thought leadership** - seeking your views or comments by phone, letter, email, surveys, website forms or by attending meetings with you for the purposes of thought leadership research All Processing is subject to the applicable law as explained in paragraph 6.

You have the right to object to this processing if you wish, by emailing info@berlineaton.com. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

6. What is the Lawful Basis for Processing Your Personal Data?

When we collect and Process your personal information in connection with the purposes set out in this privacy notice, we will ensure this is only done in accordance with at least one of the legal grounds available to us under data protection law:

- contract - the Processing is necessary for us to comply with our contractual obligations with you as our Client
- consent - we have obtained your explicit consent
- legal obligation - the Processing is required by applicable law
- vital interests - the Processing is necessary to protect the vital interests of any individual
- legitimate interest - we have a legitimate interest in carrying out the Processing.



Where we rely on this legal basis, our legitimate interests are:

- the provision of services to you as our Clients
- the operation and management of our business
- the promotion of our business
- the publication of thought leadership research.

We do not collect any Special Categories of Personal Data on our Clients.

7. Who Will We Share Your Personal Data With?

We take technical and organizational steps to ensure that your Personal Data is only shared with Personnel who need to have access to it for the performance of their role. Other scenarios in which we may have to disclose personal data to a third party are limited to:

- accountants, auditors, lawyers and other outside professional advisors - subject to binding contractual obligations of confidentiality
- third party Processors - such as providers of IT services or background checking services. These may be located anywhere in the world, subject to binding obligations explained below
- legal and regulatory authorities - upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation
- any relevant party, law enforcement agency or court - to the extent necessary for the establishment, exercise or defence of legal rights
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security
- any relevant party in the event where some or all of our assets are acquired by a third party
- plugins - our website may use third party plugins or content (e.g. Facebook, Twitter, and LinkedIn). If you choose to interact with any such plugins or content, your Personal Data may be shared with the relevant third party.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to only Process the Personal Data in accordance with our written instructions and take all reasonable measures to protect the confidentiality and security of your Personal Data.

Should a third-party Processor be located outside Canada, we will only make a transfer data if adequate levels of protection are in place to protect any information held in that country, or the local service provider complies with applicable privacy laws at all times.

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

8. How Long Do We Keep Your Personal Data?

We keep your personal data for as long as necessary to provide our services and to fulfil our legal, tax or accounting responsibilities. You may withdraw your permission as noted in 10 below, at any time by contacting info@berlineaton.com.



9. Transferring Your Information Outside of Canada

At times, we work with Clients and Personnel permanently or temporarily located in countries outside the Canada. For this reason, we may transfer your Personal Data to a country outside Canada when it is necessary for the performance of a contract and with your consent.

10. What Else Do You Need to Know?

- **Data accuracy** - we will endeavour to keep your Personal Data accurate and up-to-date. We rely on you to keep us informed of any changes, or if you find any errors in the Personal Data we hold for you, let us know and we will make the necessary corrections as is soon as reasonably possible and make sure they are conveyed to anyone we may have misinformed.
- **Data security** - we have taken appropriate organisational and technical measures to protect your Personal Data from unlawful or unauthorised processing, and against the accidental loss of, alteration or damage to, Personal Data stored by us from collection through to destruction. You are responsible for ensuring that any Personal Data you send to us, is done so securely.
- Your **legal rights** are as follows:
 - the right to ask for request access to or a copy of the Personal Data controlled or Processed by us
 - the right to restrict or object to our Processing activities of your Personal Data that we control
 - the right to request erasure of Personal Data that we control
 - the right to request rectification of any inaccuracies in your Personal Data
 - the right to port your Personal Data to another Controller, where applicable
 - the right to withdraw your Consent, where we control your Personal data on that basis.

We keep lists of people who have objected to Processing or asked for further use of their Personal Data to be restricted or erased, to make sure the restriction is respected in future. To exercise any of these rights, make your request by emailing info@berlineaton.com. In some cases (if your request is particularly complex or repetitive) we may charge you a fee to cover our administrative costs.

You also have the right to lodge a complaint regarding the processing of your Personal Data with a supervisory authority such as the Privacy Commissioner for BC's Office: <https://www.oipc.bc.ca/for-the-public/how-do-i-make-a-complaint/>. This does not affect your statutory rights.

11. Use of "Cookies"

Like many other websites, the Berlineaton's website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

You can disable any cookies already stored on your computer, but these may stop our website from functioning properly. Click <https://www.wikihow.com/Disable-Cookies> for information about how to disable cookies.

12. Review of this Notice

We keep this notice under regular review. It was last updated in April 2020. Should we make any significant amendments to this, we will flag this on the home page on our website. Please check this



page occasionally to ensure that you're familiar with this and any changes. Any questions regarding this notice and our privacy practices should be sent by email to info@berlineaton.com.

13. Codes of Professional Conduct, Standards and Ethics

Our team is made up of professional management consultants and certified executive coaches. Our work is guided by our commitment to a code of professional conduct, standards, and ethics set out by our professional associations: the Canadian Association of Management Consultants (cmc-canada.ca) and the International Coach Federation (coachfederation.org).

