

# Privacy Policy DCC / TCI Group

Version 2 (3 Juni 2025)

## 1. INTRODUCTION

Welcome to the privacy policy of the Dutch Coating Consultants / TCI Group (DCC / TCI). We respect your privacy and are committed to protecting your personal data.

This privacy policy will inform you about the types of personal data we keep from you, the purpose for collecting your data, how we look after your personal data, your privacy rights and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## 2. IMPORTANT INFORMATION AND WHO WE ARE

### Application

This privacy policy applies to all individuals from which we process personal data, except for those employed by us. Therefore, this external privacy policy applies to

- our customers;
- participants of our training courses and exams;
- visitors of our websites;
- recipients of our emails and other correspondence;
- visitors and participants of meetings and other types of events we organise;
- our suppliers and (sub) contractors, including trainers working on a self-employed basis; and
- any other individual who contacts us or who we contact or any other individual whose personal data we process.

This privacy policy does not apply to our employees, (agency) workers, job applicants or members of the board of directors. We operate a separate internal privacy policy for these individuals.

### Data controller

The DCC/TCI Group is made up of different legal entities, including:

- In the Netherlands:
  - Dutch Coating Consultants BV (Dutch Chamber of Commerce number: 56465777) (DCC BV);
  - and
  - Dutch Coating Consultants Training BV (Dutch Chamber of Commerce number: 62433695) (DCCT BV).

- In the United Kingdom:
- Training & Coating Consultants LTD (**TCCL**) (Companies House number 09592853) (TCCL LTD); and
  - Transocean Anti-Corrosion LTD (**TCI**) (Companies House number 4826434) (TCI LTD).

This privacy policy is issued on behalf of these entities of the DCC/TCI Group so when we mention "DCC/TCI", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the DCC/TCI Group responsible for processing your data.

We operate the following websites:

- [www.dccbv.com](http://www.dccbv.com) operated and controlled by DCC BV;
- [www.dcc-training.com](http://www.dcc-training.com) operated and controlled by DCCT BV;
- [www.dcc-training.nl](http://www.dcc-training.nl) operated and controlled by DCCT BV; and
- [www.cip3.co.uk](http://www.cip3.co.uk) operated and controlled by TCI.

#### **Data privacy manager and contact details**

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Erik Boer  
[info@dccbv.com](mailto:info@dccbv.com)

#### **Complaints**

You have the right to make a complaint at any time to the relevant data protection authority:

The relevant data protection authority for the European Union (EU) is the Dutch data protection authority, De Autoriteit Persoonsgegevens (AP): <http://www.autoriteitpersoonsgegevens.nl/>.

The relevant data protection authority for the United Kingdom (UK) is the Information Commissioner's Office (ICO): [www.ico.org.uk](http://www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the AP or ICO, so please contact us in the first instance.

#### **Changes to the Privacy Policy and your duty to inform us of changes**

We keep our privacy policy under regular review. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **Third Party links**

Our websites currently not include links to third-party website, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to install cookies on your device or collect or share data about you. In any event, we do not control third-party websites and are not

responsible for their websites and privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **3. DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes your company- / tradename, VAT-number, first name, maiden name, last name, username or similar identifier, title and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Training Data includes first name, maiden name, last name, diet preferences (for meals during course), personal AMPP student ID (registration) number and AMPP level.
- Exam Data includes a personal AMPP student ID (registration) number, first name, maiden name, last name, exam date and location, exam ID number, AMPP level, name of lead instructor.
- Technical Data may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites.
- Profile Data includes purchases or orders made by you, your interests, preferences, feedback and survey responses (if any).
- Usage Data includes information about how you use our websites, products and services.

We currently do not collect, use and share Aggregated Data such as statistical or demographic data for any purpose. In any event, Aggregated Data could be derived from your personal data, but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, Usage Data may be used to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We usually do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We do, however, collect and process the results of any exams you participate in and share this with our partner NACE / AMPP (see also above and further below) and may process your diet preferences for the meals provided during our training courses and exams

Our products and website are not intended for children and, therefore, we do not knowingly collect data relating to children.

#### 4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your Identity, Contact, Financial, Training and Exam Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - register as a participant of our training courses or exams;
  - become our supplier or a (sub) contractor;
  - meet us in person or during your communications with our client customer team;
  - request further information about our products or services to be sent to you;
  - enter a survey (if any); or
  - give us feedback or contact us.

When you participate in an exam we collect and process your work and mark the results.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

- **Automated technologies or interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies (see below) and other similar technologies. Please see more about our cookies below.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - Identity and Contact Data from publicly available sources (such as the Chamber of Commerce).
  - Training, Exam Data and feedback from AMPP / NACE.

#### 5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you.
- Where it is necessary for our **legitimate interests** (or those of a third party, for example AMPP) and your interests and fundamental rights do not override those interests.
- Where we need to **comply with a legal obligation**.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Generally, we do not rely on **consent** as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## 6. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, for example where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or supplier or to address any initial questions you may have before entering into an agreement with us	(a) Identity (b) Contact (c) Training Data (if training) (d) Exam Data (if exam)	Performance of a contract with you
To process and deliver your order or to manage our contractual relationship with you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Training Data (if training) (f) Exam Data (if exam)	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to comply with a legal obligations
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Training Data (if training)	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review or take a survey	(f) Exam Data (if exam)	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a survey	(a) Identity (b) Contact (c) Profile (d) Usage (products only)	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To manage your participation in our training courses and or exams	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Training / Exam	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Financial (e) Training / Exam	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

### Marketing

We normally do not use your personal data for marketing.

### Promotional offers from us

We may use your Identity, Contact, Technical and Profile Data and you receive marketing communications from us if you have requested information from us.

### Third party marketing and opting out

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. We normally do not share your personal data with any third party for marketing purposes.

But if we do (based on your consent), you can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### Use of Cookies

We use cookies on various pages to make your visit to our website attractive and to enable the use of certain functions. Cookies are small text files that are stored on your computer, tablet or smartphone when you visit our website.

We normally only use necessary cookies (e.g. to prevent spam, monitor the performance of our websites). Please see the cookie banner on our website for a complete list of the types of cookies we may install on your device and what they do.

Most of the cookies we use will be deleted from your device at the end of the browser session (so-called session cookies). Other cookies remain on your computer, tablet or smartphone and enable us to recognise your device on your next visit (so-called persistent cookies). These cookies are used to greet you with your username and spare you the need to fill in forms with your data for subsequent orders.

When you visit our websites we will inform you and you can set your browser to notify you when and which cookies are set. You may then decide to accept only certain cookies, or generally exclude the acceptance of cookies.

### **Analytical tools**

We normally do not use analytical tools such as Google Analytics for your use of our website. But if we do, we follow guidance in respect of these tools from the relevant data protection supervisors.

We note in this respect that several privacy authorities in Europe are investigating to what extent the use of Google Analytics is allowed under the relevant data protection laws. We are monitoring these developments and will act accordingly to ensure compliance with these data protection laws.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **7. DATA RETENTION**

The processing of your personal data be subject to the following data retention policy, unless you have expressly consented to the further use of your data.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. For instance, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for at least 7 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please contact us if you need any further information with respect to data retention, including the periods for retaining your data.

## **8. DISCLOSURES OF PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out above:

- NACE / AMPP.
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, accountants, tax advisers, auditors and insurers.
- Tax authorities, regulators and other authorities acting as processors or joint controllers.
- Companies within DCC/TCI Group.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

In particular, for purposes of performing the contract and where you participate in exams we share to the extend necessary your Training / Exam Data and Contact Data with AMPP / NACE. However, we do not review or administer any exams and, consequently, your score(s) and results will be collected and directly forwarded by the Lead Instructor to AMPP / NACE.

Further, we will provide personal data to third parties that are involved in the payment process, such as banks and payment services providers. The data protection declaration of the respective third party shall apply in this respect. We may also furnish third parties your data in order for them to perform credit control checks on our behalf.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **9. INTERNATIONAL TRANSFERS**

We generally do not transfer your personal data outside the European Economic Area (EEA) and the UK, except for some Exam Data we provide to NACE / AMPP in the United States. If we transfer your personal data out of the EEA and the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and the UK Government (this is currently the case in respect of data flowing to the United States by means of an adequacy decision of the EU commission). In respect of data flows between the EU and UK: the UK has deemed EU countries adequate for transfer purposes and recognised EU adequacy decisions in relation to other countries. The EU has also issued adequacy findings in relation to the UK. For data transfers from the UK to the United States we comply with the UK Extension (UK-US data bridge) and for data transfers from the EU to the US with the EU Data Privacy Framework (or any other applicable or subsequent rules and regulations).
- Where we use certain service providers, we may use contracts approved by the European Commission or contracts approved for use in the UK, which give personal data the same protection it has in the EEA or the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA and the UK.

## **10. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your personal data is transmitted over the Internet in encrypted form. We protect our website and other systems via technical and organisational measures to prevent loss, destruction, access, modification or distribution of your data by unauthorised persons.

## **11. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data . This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask

us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data’s accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights, please contact us. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.