

## EMG and GDPR

EMG - Educations Media Group works with over 4,000 schools and course providers in Europe and is processing personal information on over 3 million members every year. For EMG, working with personal data has always been at the core of our business. EMG started working with GDPR over two years before the law took place and all processing of data has been GDPR compliant well before the new EU regulations went into effect. All EMG documentation and processes have been reviewed by third party GDPR experts to ensure compliance.

### Important information regarding GDPR and EMG:

#### **Q: Who is the data controller and who is the data processor?**

A: EMG is the data controller and our clients are data processors. A DPA, data processor agreement, is included in our client terms and conditions, which was updated in our digital signing tool GetAccept March 28th 2018. The users engage with EMG's websites and services to find education and the users then enter into an agreement with EMG when requesting information or enrolling in education.

#### **Q: I've read that you need to have opt-in check boxes for GDPR compliance. Why does EMG have opt-out check boxes on your sites?**

A: You only need to have opt in if you're asking for consent. On all EMG sites we're enforcing contract over consent. This is in line with [Article 6.1b](#) and [provision 44](#) in GDPR. For us to fulfil our contract and send the personal data to third party (the school) the users must accept our T&Cs and Privacy Policy. Hence we use opt out check boxes. You cannot send personal data through any of our forms in any market without having the boxes checked.

#### **Q: Does EMG name organisations and any third-party controllers who will be relying on the consent?**

A: In EMG's terms and conditions it's clearly stated how we will use the data and also which third party controllers will use the data, e.g. the training provider/school. We never send personal data to any other third-party controllers.

#### **Q: Does EMG seek permission from potential delegates to share their details with education providers?**

A: Yes. We have an opt-out box which users always accept when sending personal data via EMG. When approving this they agree to our terms and conditions and privacy policy.

#### **Q: As clients, can we use the personal data we receive from EMG or do we need explicit permission from the user?**

A: Yes. You can now use the personal data of EMG's website visitors. In our T&Cs which the user has accepted, we clearly state what you can do with the data. See this section highlighted below:

##### *1.2 Information requests and enquiries*

All requests are made through the Website by selecting one or more Courses and enquiring for more information. Once you have completed a request, we will send your request to the provider and they will contact you with more information. The provider will save your information to help you in your education selection process. This may include marketing services, direct communications in the form of newsletters and other targeted communications, as well as data collection and analysis.

We are happy to answer any additional questions that might arise in regards to GDPR. send the questions to your contact person at EMG and they will be passed on to the data protection officer at EMG.