

ELB LEARNING AND GDPR

At ELB Learning, we are committed to protecting the privacy and security of our Customers' and users' personal data. As a U.S.-based company, we recognize the importance of adhering to the European Union's General Data Protection Regulation (GDPR) and other data protection laws.

Our Approach To GDPR Compliance

1. **Privacy Policy and Cookie Notice**

Our [Privacy Policy](#) provides information about how we collect, use, and share personal data in accordance with GDPR requirements, including:

- **Data Collection and Use**: Disclosing the categories of personal data we collect, the purposes of processing, and the legal bases.
- **Data Subject Rights**: Explaining the rights of data subjects under GDPR, such as the right to access, rectify, erase, and restrict processing of personal data.
- **Data Sharing and Transfers**: Describing our data sharing practices with third parties and safeguards for international data transfers.

2. **Data Security Measures**

- **Access Controls**:
 - Strict access control policies ensure that only authorized personnel can access personal data.
- **Incident Response Plan**:
 - We have a comprehensive incident response plan to detect, respond to, and recover from data breaches promptly.

3. **Vendor Management**

We maintain a rigorous vendor management program to ensure that all third-party vendors adhere to GDPR and our data protection standards. We rigorously vet our vendors and service providers to ensure compliance with our data security and privacy standards. This includes:

- Conducting thorough due diligence to assess their security measures.
- Implementing data processing agreements that align with GDPR requirements.

4. **Rights of Data Subjects**

We support our Customers in meeting data subject rights under GDPR, including the right to access, rectify, erase, and restrict processing of personal data. For Authorized Users, these rights can be exercised directly through the applicable Customer.

5. **European Representatives & Supervisory Authority**

In compliance with Article 27 of the GDPR, ELB has appointed representatives in the European Union and the United Kingdom to facilitate GDPR compliance and data subject rights. As ELB does not maintain affiliates or a physical presence in the EU (i.e., is not "established in the Union" as defined under the GDPR), it is not subject to the jurisdiction of any specific EU supervisory authority. However, any relevant supervisory authority within the EU retains the authority to enforce compliance and address grievances related to our data processing activities.

6. **Commitment to Continuous Improvement**

We are committed to continuous improvement in our privacy and security practices. Therefore, the policies and agreements identified above are constantly updated to reflect changes in regulations and the rapid pace of emerging technologies like AI. Our objective is to ensure that our Customers' personal data remains protected and that we consistently meet the highest standards of data privacy and security.