Section V – GDPR Data Processing

This section describes how MIMIR Learning collects, uses, stores, and shares personal data in the course of its training and certification activities. It exists to ensure MIMIR Learning meets its obligations under the General Data Protection Regulation (EU) 2016/679 (GDPR).

MIMIR Learning is a small company. Both team members are jointly responsible for data protection. There is no formal Data Protection Officer (DPO); however, all privacy questions and requests should be directed to privacy@mimirlearning.com, which both team members monitor.

19. GDPR

This section covers:

- Individual professionals booking courses through the MIMIR Learning website
- Corporate clients booking training for their employees
- Certification and examination administration with
- Exam Institutes
- Data stored in Microsoft 365 (email, documents, OneDrive) and Odoo (CRM, invoicing)

19.1. What data we hold and Why

We process the minimum personal data necessary to deliver our services. The table below sets out what we hold, why, and on what legal basis under GDPR.

Data	Why We Hold It	Where It Lives
Name, Surname, email, phone	To confirm bookings and communicate with clients	Odoo, Microsoft 365 email
Invoicing details	To issue invoices and maintain financial records	Odoo, Microsoft 365 email
Course & attendance records	To confirm participation and support certification admin	Odoo, Microsoft OneDrive
Name, Surname, email	Submitted to LMS to allow access to classroom materials	AnewSpring
Name, Surname, email	Submitted to Examination institutes to register candidates for exams	Examination body portals
Marketing opt-ins	To send course news and updates – only where you have opted in	Odoo

We do not collect sensitive personal data (health, religion, ethnicity, etc.) unless a candidate requests a reasonable examination adjustment, in which case we ask for explicit consent separately.

19.2. Our Systems

MIMIR Learning uses the following tools to store and process personal data:

System	Provider	What Personal Data It Holds	Security
Email & documents	Microsoft 365 (Outlook, OneDrive, Word)	Client correspondence, course materials, signed agreements	Microsoft enterprise security; MFA enabled
CRM & invoicing	Odoo	Client contact details, course records, invoices	Cloud-hosted; password-protected; access limited to 2 users
LMS	Anewspring	Name, surname, email of each delegate	Anewspring Enterprise security
Exam body portals	PeopleCert / APMG / PMI (external)	Candidate exam registration data	Managed by the examination body; secure login credentials

Both team members have individual login credentials for all systems. No shared passwords are used. Access to client data is restricted to MIMIR Learning staff only.

19.3. Who we share data with

We do not sell or share personal data with third parties for marketing. We share data only where it is necessary to deliver our services:

Recipient	What Is Shared	Why	Safeguard
Exam Institutes	Name, Surname, email	To register candidates for exams	DPA via ATO accreditation agreement; EU data location

Candidates are informed at the point of booking (and in our Privacy Policy) that their data will be shared with the relevant examination body as a necessary part of the certification service.

19.4. How Long we keep the data

Data Type	How Long We Keep It	Reason
Training & attendance records	10 years from course date	Accreditation body requirements
Certification / exam records	10 years from certification date	Exam Institute requirements
Invoices & financial records	10 years	Legal / tax obligation
Marketing consent records	Until consent withdrawn, then 3 years	GDPR accountability

When data is no longer needed, we delete it from Odoo, from Microsoft 365 (including OneDrive and email), and from any local copies.

19.5. Individual rights

Under GDPR, individuals have the right to access, correct, delete, or restrict their personal data, and to object to certain uses. To exercise any right, individuals should email privacy@mimirlearning.com with the subject line 'Data Privacy Request'.

We will respond within 30 calendar days. We may ask for proof of identity before acting on a request. If we cannot fulfil a request (for example, because a legal obligation requires us to keep the data), we will explain why.

Right	What We Do
Access (DSAR)	Provide a copy of all personal data held in Odoo, Microsoft 365, and exam body records within 30 days
Rectification	Correct inaccurate data in our systems and, where relevant, notify the examination body
Erasure	Delete data unless a legal or accreditation obligation requires us to retain it
Object to marketing	Remove from marketing communications immediately upon request
Withdraw consent	Honoured immediately; prior processing remains lawful

19.6. Data security

Given the size of MIMIR Learning, our security measures are practical and proportionate:

- All Microsoft 365 accounts are protected with strong passwords and multi-factor authentication (MFA)
- Odoo is accessed via individual user accounts; no shared credentials
- Client data is never sent via unencrypted channels (e.g. no personal data in unprotected email attachments where avoidable)
- Examination body portals are accessed via secure credentials held only by MIMIR Learning team members
- No client personal data is stored on personal devices without encryption
- If a team member leaves or a device is lost, Microsoft 365 credentials are changed immediately

19.7. If something goes wrong

If we become aware that personal data has been lost, accessed by someone unauthorised, or shared incorrectly, we will:

- Act immediately to contain the situation (e.g. change passwords, recall emails)
- Assess within 24 hours whether the incident poses a risk to the individuals affected
- If a risk exists, notify the competent national Data Protection Authority within 72 hours of becoming aware (as required by GDPR Art. 33)
- If the risk is high, contact affected individuals directly to explain what happened and what we are doing
- Record the incident in our Breach Log (a simple log kept in OneDrive), regardless of severity

All incidents, even minor ones, are recorded so we can learn from them and demonstrate accountability.

19.8. Annual GDPR review checklist

Every 12 months (or sooner if our tools, services, or legal obligations change), both team members review this procedure against the Annual GDPR review checklist. Please refer to Appendix I

20. Commercial Conditions

Mimir Learning Srl ensures that all commercial activities are governed by formalised Commercial Conditions that define the terms applicable to the provision of training services, including Virtual Classroom, Classroom Training, e-learning, and related certification services. The applicable cancellation and refund policies are fully detailed in the document **Q015_Commercial_Conditions_EN**.

Commercial Conditions are maintained under document control within the Quality Management System and are subject to periodic review to ensure continued suitability, effectiveness, and compliance.

In order to ensure full legal compliance across jurisdictions, Commercial Conditions are adapted where necessary according to local legislation requirements. In particular, the primary governing framework is based on **Italian law**, as Mimir Learning Srl is registered in Italy. However, where services are offered in other countries, localized versions of the Commercial Conditions are made available on the respective national websites to ensure alignment with applicable local regulatory and consumer protection requirements.