

Privacy Policy and Principles of Data Processing

1. Introduction and contacts of the data controller

1.1 The data controller is Vipi konsultatsioonid OÜ (registration code 14244674) (hereinafter referred to as Vipi).

1.2 Vipi provides various training courses and services to its clients, which involves the collection and processing of clients' personal data.

1.3 Depending on the service, all or some of the data mentioned in Section 2 may be collected.

2. Vipi collects the following data about its clients:

2.1 Client's first and last name;

2.2 Client's personal identification code;

2.3 Client's contact details (phone number, email address, and residential address);

2.4 Workplace and employer information (e.g., registration code, PIC code, address);

2.5 Training project details (project name and number);

2.6 Other data depending on the content of the training or service.

3. Purposes of data collection

3.1 Compliance with legal obligations, with the following examples:

3.1.1 Pursuant to the Adult Education Act, Vipi must issue certificates and diplomas to participants of training courses, which must include the participant's first and last name as well as personal identification code.

3.1.2 In accordance with tax laws, Vipi requires the client's name and address for invoice preparation.

3.1.3 The client's name, personal identification code, and contact information are necessary for resolving potential disputes and complaints (e.g., initiating expedited payment order proceedings).

3.2 Fulfillment of rights and obligations between the client and the data controller

3.2.1 For concluding a training agreement;

3.2.2 For confirming participation in the training;

3.2.3 For issuing and sending invoices;

3.2.4 For providing organizational information and materials related to the service;

3.2.5 For making other agreements and clarifications.

3.3 Marketing Purposes

3.4 Advertising messages and newsletters about upcoming training courses.

3.5 In this case, the client's separate consent is requested.

3.6 The client has the right to withdraw their consent at any time, after which Vipi will no longer send offers.

4. Personal Data Processed by Vipi

4.1 Name of the training (the client registers for a selected training via the website form);

4.2 Participation in the training and assessment of learning outcomes (based on the completion of the curriculum, Vipi decides whether to issue a certificate or diploma).

5. Sharing of personal data by Vipi

5.1 Vipi must share data about training participants with the payer of the training (e.g., employer, Unemployment Insurance Fund, etc.). The end client has a legitimate interest in receiving information about the services they have paid for.

5.2 Vipi may, if necessary, use the services of a company that handles direct marketing or bulk mail for information distribution.

5.3 In case of the client's failure to meet payment obligations, Vipi may forward information about debts (including the client's personal identification code, dates of debt initiation and resolution, and the outstanding amount) to a credit information registry. In cases of non-fulfillment of payment obligations, Vipi may also share the relevant data with collection agencies, legal advisors, courts, and other individuals or entities involved in the respective proceedings.

5.4 If necessary, additional data may be shared with partners depending on the nature of the service.

5.4.1 In such cases, the data transfer will be separately agreed upon with the client.

6. Retention of client data by Vipi

6.1 Vipi uses email services provided by Google and a registration platform provided by JotForm for information exchange.

6.2 When storing personal data, including documents containing personal information, Vipi follows the principle of retaining data only for as long as necessary to fulfill the purpose for which the data was collected or as long as legally required by law.

6.3 Most of the personal data collected by Vipi relates to the recipients and nature of the services provided (e.g., training, document creation, etc.). Such data may also be relevant in potential future disputes. Accordingly, Vipi determines data retention periods based on the maximum limitation periods established by law for filing claims.

7. Client rights regarding the processing of personal data

7.1 The client's rights are set out in the Regulation (EU) 2016/679 of the European Parliament and of the Council, dated April 27, 2016, on the protection of individuals with regard to the processing of personal data and the free movement of such data, and the repeal of Directive 95/46/EC (General Data Protection Regulation).