

PRIVACY POLICY

Introduction

International Workplace Limited ("We") are committed to protecting and respecting your privacy. This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.internationalworkplace.com ("our site") you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the "Act") and the EU General Data Protection Regulation ("EU GDPR"), unless agreed otherwise the data controller/processor is International Workplace Limited (Co. No. 05033133) of 1-3 Church Plain, Wells-next-the-Sea.

The following information tells you more about the information we collect from you and how it is used.

Your individual rights

We are committed to following the guidelines for lawfully controlling and processing your information as per the Act and EU GDPR.

At any time you maintain the following rights.

- **Right to be informed:** You can request information on personal data we process about you and it will be concise, transparent, intelligible and easily accessible; written in clear and plain language; and free of charge.
- **Right of access:** You have the right to obtain confirmation that your data is being processed; access to your personal data; and other supplementary information.
- **Right to rectification:** You are entitled to have personal data rectified if it is inaccurate or incomplete.
- **Right to erasure:** The right to erasure does not provide an absolute 'right to be forgotten'. You have a right to have your personal data erased and to prevent processing in the following circumstances:
 - where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
 - when you withdraw consent after specific consent was previously supplied;
 - when you object to the processing and there is no overriding legitimate interest for continuing the processing;
 - the personal data is unlawfully processed;
 - the personal data has to be erased in order to comply with a legal obligation;
 - the personal data is processed in relation to the offer of information society services to a child.
- **Right to restrict processing:** We will restrict the processing of your personal data in the following circumstances:

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- where you contest the accuracy of the personal data, we will restrict the processing until you have verified the accuracy of the personal data;
 - where an individual has objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether International Workplace’s legitimate grounds override those of the individual;
 - when processing is unlawful and the individual opposes erasure and requests restriction instead;
 - If we no longer need the personal data but the individual requires the data to establish, exercise or defend a legal claim.
- Right to data portability: The right to data portability only applies:
 - To personal data you have supplied to us;
 - where the processing is based on your consent or for the performance of a contract; when processing is carried out by automated means;
 - where the data only contains your personal data and not data of another individual.
 - Right to object: You have the right to object to:
 - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - direct marketing (including profiling);
 - processing for purposes of scientific/historical research and statistics.

How we obtain and use your information

We collect your information in a number of ways, and by providing us with data you consent to us processing it for all activities described in this policy. If you do not wish your information to be processed for all or any specific activities then you maintain the full right to contact us and either have your information removed or flagged so that it is not processed.

We may collect and process the following personal data about you:

Salutation; First name; Surname; Address; Email address; Company name; Job Title; Contact method; Contact number; Contact preferences; and Contact history.

Special category data you may be asked for

You will be asked to provide your ‘date of birth’ and ‘nationality’ in order to be registered for NEBOSH qualifications. This data is processed by NEBOSH and stored on their secure portal. We do not store this data or use it for any other purposes, but authorised personnel may have access to it.

Information you give us

You may give us information about you when you register to use our site, subscribe to any of our

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services, place any orders on our site, participate in any discussion boards or other interactive services on our site or by corresponding with us by phone, email or otherwise. The information you give us may include your title, name, job title, organisation, address, email address and telephone number, personal description and photograph. Some information which we request, such as user preferences, is entirely optional, although providing us with this information will allow us to provide you with a better service.

We will process this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us, including, but not limited to, providing personalised content;
- to provide you with updates and information about other products and services we offer that are similar to those you have already purchased or enquired about;
- to provide you with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (email, SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to process your data as necessary to fulfil contractual obligations or provide services you have subscribed to, we (or they) will contact you by electronic means only if you have consented to this;
- to notify you about changes to our services;
- to notify you of planned maintenance or system outages;
- to ensure that content from our site(s) is presented in the most effective manner for you and your device that is accessing it.

Updates are sent on a regular basis depending on which services you receive and the options you have selected. Promotional emails may be sent on a weekly basis and from time to time you may receive more than one promotional email in a week.

You have the ability to select what you do and don't receive at the time of registration, or at any subsequent point by changing options on your profile. You are always free to unsubscribe from any of our communication lists at any point. If you wish to unsubscribe please click the link located in the footer / header of our email and follow instructions.

Information we collect about you

With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

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- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Conversations that are initiated by you using our online chat support feature (via Social Intents or HubSpot).

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Forums, personal messaging and links to other websites

Any personal details, photographs and/or information which you make available to other users whilst using the forum area of the site are given at your own risk, although we do monitor all threads and endeavour to remove anything which may cause offence or is potentially dangerous. Any personally identifiable information which you provide can be read and used by other users. We are not responsible for any personally identifiable information which you provide in the forum. Our site may, from time to time, contain links to and from other websites, including those of our partner networks, advertisers and affiliates. If you follow a link to any such website, please note that such websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check the privacy policies on any linked websites before you submit any personal data to the websites.

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Payment processing

You can purchase goods and services on the site by making payments online. We use a third party supplier to process online payments, which are transacted on an encrypted secure server using SSL (secure sockets layer) technology. The company we use is Stripe, an e-commerce transaction and payment company.

When you purchase goods or services from us online, you are transferred to Stripe's secure server environment where the whole transaction is processed. You will be informed that you are entering a secure environment (demonstrated by the padlock symbol) and the url will change to https://... On Stripe's secure server. If we process an online credit card transaction on your behalf, the personal credit or debit card information you provide us with is only used for the purpose of processing that transaction, and is not stored on our system. At no time during the online payment process are we provided with your personal credit or debit card information, which is processed and encrypted completely by Stripe. We do not store sensitive financial information on customer purchases, nor is it at any time made available to us.

Cookies

Our website uses cookies to distinguish you from other users of our website. Cookies are text files which a website can use to recognise repeat users, and allow us to observe your use of the site. The cookie itself contains no personally identifiable information but it does pass an ID to our server which allows us to tie the cookie to your personal information. For example, cookies make it possible for us to identify registered users without needing to ask for registration details every time you access the site, and to save you logging in every time you visit the site.

We use cookies to ensure we give you the best experience on our website. Cookies need to be accepted for this website to fulfil required functionality. If you do not want a cookie, you can set your browser to deny it, although this may mean some functionality does not work as intended. You can read more about cookies at: <http://www.allaboutcookies.org/faqs/cookie-file.html>

This website uses the following cookies:

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Cookie Types	Cookie Names	Essential to site operation	Purpose	More information
This browsing session	PHPSESSID	Yes	Identifies your current web session to our server. It is set upon your arrival to our site and deleted when you leave. It holds no personally identifiable information.	
Google Analytics	_utma _utmb _utmc _utmz	No	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from	Google Analytics Privacy Overview

Admin access	wplng	Yes	and the pages they visited. Is set if you have access to restricted parts of the site and then ensures access.
Requested permanent sign in	wplperm	Yes	Is set if you ask to be remembered so that you don't have to sign in again when you return to the site.
Store Javascript preference	javascriptEnabled	Yes	Lets us know if you have Javascript enabled in your browser so that we can deliver content to you and provide alternative means for using the site without it.
Signed in status	Loggedin	Yes	Lets us know that you're logged in so that you can access and use the site in ways you couldn't if you weren't.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Except for essential cookies, all cookies will expire as per <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

Confidentiality / security and where we store your personal data

Unless specifically contractually agreed the data we collect/process/control from you will be within the UK or European Economic Area (“EEA”). The only exceptions to this is where we use sub-processors to secure payments made to us through the online payment provider “Stripe”, our internal accounting system “Xero”, our online chat facility “Social Intents” or “HubSpot” and “Google

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Analytics” (covered in our cookies section). All of these sub-processors have demonstrated to International Workplace Ltd that they process data and maintain privacy to an adequate standard under the Act and EU GDPR.

To view these sub-processors policies regarding your data you can view them here:

We only transfer your personal information to sub-processors where we can be sure that we can protect your privacy and your rights, for example the sub-processor is located in a country which the EU has deemed to have adequate data protection laws in place, where that sub-processor employs contractual protections equivalent to the terms of the EU-US Privacy Shield, or where we have a contract in place with that sub-processor which includes the European Commission's standard data protection clauses.

We have implemented security policies, rules and technical measures to protect the personal data that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All our employees and data processors who have access to, and are associated with the processing of, personal data, are obliged to respect the confidentiality of our visitors’ personal data. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Disclosure of your information

We may share your personal information with any member of our group from time to time, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
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We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of International Workplace Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Access to the personal data we may hold about you

You can check what data we hold about you by first logging in and then editing your details and preferences at www.internationalworkplace.com/personalStatusArea/myProfile. Alternatively, please email gdpr@internationalworkplace.com.

We can provide you with a readable copy of the personal data which we keep about you, within one month from the date of your request.

We allow you to challenge the data that we hold about you and, where appropriate, you may have the data:

- erased;
- rectified or amended;
- completed; or
- transferred to another third party.

Where you have requested for data to be erased, this will be erased from our systems within 14 days but we retain the data for a further 14 days in the form of backup media and as per our Backup policy.

Closing your account

If for any reason you wish to stop using our site and close your account, we will remove any personally identifiable information from our publicly viewable database. We may retain certain data contributed by you if we believe it may be necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable data, account recovery, or if required by law. To request that we close your account, please send your request to us by email at gdpr@internationalworkplace.com using the email account with which you are registered with the site.

Contact

You can contact our customer support team if you have any questions, comments or requests regarding the privacy policy by email: gdpr@internationalworkplace.com by mail: Data Protection Officer, International

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Workplace, The Quad, 9 Journey Campus, Cambridge, CB3 0AX; or by telephone on 0333 210 1995.

Changes to the Privacy Policy

We reserve the right to modify this privacy statement at any time as we see fit and will use our reasonable endeavours to inform you when changes are made. Any changes we make will be posted on this page - please check back frequently to see any updates or changes to our privacy policy.

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