

Privacy Policy V 2.1.1

Privacy Policy - UK

We understand and appreciate that you may be concerned about your privacy, the confidentiality and security of information we may gain about you online.

We are committed to protecting your privacy and to complying with the EU General Data Protection Regulation 2016/679.

The purpose of the Privacy Policy ("Privacy Policy") is to outline the Personal Data collected by us and the use of such information. This Privacy Policy applies only to the actions of Scopesuite Ltd and User with respect to this Website or App ("Application").

For the purposes of the applicable Data Protection Laws, Scopesuite Ltd is the "Data Processor". The data processor processes personal data only on behalf of the controller.

By using the Website and App, you agree to accept this Privacy Policy. Where this Privacy Policy uses a word starting with a capital letter, that term will be defined in the Terms and Conditions or elsewhere in this Policy. If you do not agree to the terms of this Privacy Policy or the Terms and Conditions, you should not use the Scopesuite Services, Website or App.

Personal Information Collected

We do not collect your Personal Data unless you knowingly provide the information or if your employer provides this to us on your behalf. The types of Personal Data we collect will depend on the purposes(s) for which we are collecting it. For example, we may ask for;

Personal identifiers and contact details

- your name;
- contact details;
- postal address;
- date of birth;
- history records of your communication and interaction with us;

Collection of Personal Data

We will collect Personal Data from users and customers in a variety of ways, including via electronically, in person, from employers or Training Organisations, when accessing our website (www.scopesuite.com) and when we provide a service to you.

We collect Personal Data for the primary purpose of providing our Services, providing information to our clients and marketing. We may also use Personal Data for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

Other ways we may collect Personal Information include:

- Browsing our Website;
- Registering on our Website;
- Logging into the Website once registered;
- Logging into the App once registered;
- Using Services we provide on the Website;
- Using Services we provide on the App;
- Making a purchase using the Website;
- Contacting our Helpdesk;
- Clicking on Website banners, hyperlinks or plugins; or
- During a conversation with our team members.

Storing the Personal Data

We use a number of procedures and processes to ensure, where possible, the security and integrity of your Personal Information.

We protect your Personal Data by:

- Restricting access to Personal Data
- Maintaining technology products to prevent unauthorised computer access

We have secured our site using industry standard technology. Unfortunately, no data transmission over the internet can be guaranteed as completely secure. Once any information is in our possession, we will take reasonable steps to protect that information from misuse, loss, unauthorized access, and modification or disclosure. While we strive to protect such information, we cannot guarantee 100% the security of any information (personal or other) you transmit to us. Therefore, we will not be liable for any breach of security or unintended loss or disclosure of information due to the Website being linked to the Internet.

The Purposes of Collecting, Holding, Using and Disclosing Personal Data

We only collect Personal Data to the extent necessary to fulfil one or more of our functions and activities and will do so only by fair and reasonable means. We collect your Personal Data so that we can carry out the following actions ("Purpose"):

- to provide you with Products and Services that you have requested from us or that your employer has requested from us;
- to communicate with you, including about products and Services provided by us;
- to answer your questions and provide you with information or advice;
- provide your Personal Information to third parties that assist us in providing Products and Services you have requested;
- carry out administration, marketing, planning, fraud and loss prevention activities, procurement, product and service development, quality control and research to improve the way we and our related bodies corporate and service providers provide Products and Services to you;
- to consider and respond to complaints made by you;
- to comply with laws or regulations or to comply with any directions given by regulators or authorities.

We will only use your Personal Data for the purposes for which it was collected, and we will not otherwise disclose your Personal Data without gaining your consent except where such disclosure is required by law.

We collect aggregated information about you which informs us about our users. This will allow us to enhance the materials viewed by you and Services which we offer. The browser information we collect is used in an aggregated, anonymous manner GDPR privacy policy inclusions in our internal analysis of traffic patterns within our Website. This information is used by us to administer and improve our education and training products and Services.

Transfer in Certain Circumstances

If there is a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of Scopesuite then, in our sole discretion, we may transfer, sell or assign information collected on and through this Website (including, without limitation, PII and other information), to one or more relevant third parties.

Cookies

What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a site and allow a site to recognize your device.

Why do we use cookies and similar technologies?

Cookies do a lot of different jobs, such as letting you navigate between pages efficiently, remembering your preferences and generally improving the user experience

The following describes how we use different categories of cookies. Please note that Scopesuite **does not** use targeting cookies which can collect personal data to be used for targeted advertising.

- 1. **Strictly Necessary Cookies**: These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- 2. **Analytical/Performance Cookies**: These allow us to recognise and count the number of visitors and see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users can find what they are looking for easily.
- 3. **Functionality Cookies**: These are used to improve the functional performance of the website and make it easier for you to use. For example, they are used to remember that you have previously visited the website and asked to remain logged in to the website.

We aim to meet high standards and our policies and procedures are, therefore, constantly under review. From time to time we may change how we use and place cookies. Accordingly, we recommend that you check this page periodically in order to review our current policies and practices.

By using our Website, you agree to us placing these sorts of cookies on your device and accessing them when you visit the Website in the future. You can modify the settings on your device to prevent cookie use. Please note by disabling cookies, your user experience may be affected, and you might not be able to take advantage of certain functions of our Website.

Access to and Correction of Personal Data

Under GDPR, individuals have the:

- (1) Right to access the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information.
- (2) Right to correct the right you to have your Data rectified if it is inaccurate or incomplete
- (3) Right to erase the right to request that we delete or remove your Data from our systems
- (4) Right to restrict our use of your Data the right to "block" us from using your Data or limit the way in which we can use it
- (5) Right to data portability the right to request that we move, copy or transfer your Data
- (6) Right to object the right to object to our use of your Data including where we use it for our legitimate purposes

Complaining about a Breach of Privacy

If you wish to exercise any of your rights under this Privacy Policy, have any questions, comments or complaints regarding our practices, or if you are of the view that we have not adhered to this Privacy Policy, you can contact us by email to helpdesk@scopesuite.co.uk

You can find more information about privacy and the protection of your Personal Data, or if you disagree with the way in which we are handling your Personal Data, you can contact the Information Commissioners Office (ICO). The ICO can be contacted at:

Phone: 0303 123 1113
Online: <u>ico.org.uk/concerns</u>

Changes to the Privacy Policy

Please note that this Privacy Policy relates to the use of the Website and App and forms part of the Agreement between you and us. We may, from time to time, amend the Privacy Policy, in whole or part, in our sole discretion. Any changes to the Privacy Policy will be published on our Website and App, and will be effective immediately upon the posting of the revised policy on the Website and App. By continuing to use the Website and App following any changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of the Privacy Policy, as it may be amended from time to time, in whole or part, you must terminate your use of the Website or App.

Definitions

"Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Special categories of personal data" means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

"Scopesuite" means the "Company", "Scopesuite Ltd", "us", "we"

"Services" "Scopesuite" means the "Company", "Scopesuite Ltd", "us", "we"

"Services" means the products and Services that Scopesuite Ltd provide to you as specified in the Terms and Conditions and Master Subscription Agreement and in conjunction with the order form provided from the client, whether fees are applicable or if the client is under a fee free Agreement

"User" means in the case of an individual accepting this Privacy Policy on his or her behalf, such

individual, or in the case of an individual accepting this Privacy Policy on behalf of a company or other legal entity, who is authorised by you to use the service provided to you or purchased by you. For example, your employees and/or consultants

"We, Us or Our" means Scopesuite Ltd

"You, or "Your" means in the case of an individual accepting this Privacy Policy on his or her behalf, such individual, or in the case of an individual accepting this Privacy Policy on behalf of a company or other legal entity