

Privacy Policy

We understand that privacy and the security of your personal information is extremely important. This policy sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, as well as your rights over any personal information we hold about you. This Policy explains how we do this and tells you about your privacy rights and how the law protects you.

Introduction

This privacy notice applies to this website and other interactions (e.g, when you create an account with the Website, purchase or sign up for our product or service, sign up to our newsletter, sign up to updates, open a support ticket, when you contact us by email or phone or contact us via social media) you may have with us. If you do not agree with the terms, do not access or Websites or any other aspect of this website.

If you have any questions about privacy practices, please contact the us using the support/contact us form on the Website. You can use the contact link on your online site or email support@zenler.com to get the contact information of the Website instructors and administrator(s).

What Data Do We Collect About you

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may collect and process your personal data in a different ways:

Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.

Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details.

User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. This may include product, content, files, courses, quizzes, surveys or any other content you upload to or create on the Website.

Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system.

Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you.

Other Information Collected

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this : [Cookie Policy](#).

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment such as Stripe and Paypal and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as European Commission EU VAT database.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below. When a Third Party Service is enabled, we are authorized to connect and access Other Information made available to us in accordance with our agreement

with the Third Party Provider. We do not, however, receive or store passwords for any of these Third Party Services when connecting them to the Services. Third party integrations may include

Zapier.com: Integrations, Automation

MailChimp.com: Mailing Service

Google.com: Analytics, reCAPTCHA

DigitalOfficePro.com: PowerPoint to HTML5 Technology

SlideServe.com , SlideOrbit.com: Slide Hosting Service

Facebook.com: Facebook Login, Meta Pixel

Segment.io: Customer Data Management

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

How we use your Personal Data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

Where we need to perform the contract between us.

Where we need to process data in accordance with Customer's instructions.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the contact us form on the Website or using the privacy settings in your profile.

Purpose and Legitimate Basis for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Communication Data : We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this

case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

Customer Data: We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

User Data: We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Technical Data: We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

Marketing Data: We process this data to enable you to partake in our promotions such as competitions, prize draws and free giveaways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in

this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

Marketing communications

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations(PECR), we may send you marketing communications from us if

you made a purchase or asked for information from us about our goods or services or you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by emailing us via the contact us form at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc

Disclosures of your Personal Data

We may have to share your personal data with the parties set out below:

Online Course platform provider Zenler.com who will be data processor of your data. We have entered into a data processing addendum with Zenler to process your data. Other companies in our group who provide IT and system administration services and undertake leadership reporting. Service providers who provide cloud infrastructure, video hosting, live video platforms, email provider, IT and system administration services.

- Amazon
- Sendgrid
- FileStack
- Vimeo
- Zoom

Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. Government bodies that require us to report processing activities. require reporting of processing activities in certain circumstances. Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We share your personal data within our group of companies which involves transferring your data outside the European Economic Area (EEA).

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

Our Online course platform Zenler provider based in the UK is our data processor and we have entered into data processing agreement for the processor to protect your personal data. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. Where we use providers based in the United States (for example Amazon, Sendgrid) we may transfer data to them where we have signed data processing addendums for the provider to provide protection of data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please email us at support@zenler.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please reach us via the contact us form on the Website.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Third Party Links

We may include links to third-party websites, addons and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).

Age Limitations

By providing us with your data, you warrant to us that you are over 13 years of age.

How to contact us

You can contact us at any time if you have any questions about this Privacy Policy or our practices, or if you are seeking to exercise any of your statutory rights.

You may contact us at :