

**Revised:** 13 May 2020

**Next review date:** 31 March 2021

Educational Competencies Consortium Limited (**We**) are committed to protecting and respecting your privacy.

This policy (together with our Terms of Website Use) 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 <http://www.ecc.ac.uk/> you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 as amended from time to time (including, from 25<sup>th</sup> May 2018, by the General Data Protection Regulation) (the **Act**), the data controller is Educational Competencies Consortium of 7th Floor 30 Market Street, Huddersfield, United Kingdom, HD1 2HG.

### **INFORMATION WE COLLECT FROM YOU**

We will collect and process the following data about you:

**Information you give us.** This is information about you that you give us by filling in forms on our site <http://www.ecc.ac.uk/> (**our site**), such as the 'Contact Us' form, or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, register to become a member of our service (**Member**) or client (**Client**) and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number and (if relevant) financial and credit card information.

**Information we collect about you.** With regard to each of your visits to our site we will automatically collect the following information:

1. technical information, which may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version;
2. information about your visit, which may include the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors and length of visits to certain pages.

**Information we receive from other sources.** We may from time to time work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, analytics providers and search information providers). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

### **COOKIES**

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may from time to time use the following cookies:

1. **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our website.

2. **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.
3. **Functionality cookies.** These are used to recognise you when you return to our site. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).
4. **Targeting cookies.** These cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our site and the advertising displayed (if any) on it more relevant to your interests.

Our use of cookies will change from time to time, however, we currently use Google Analytics and relevant social media cookies (such as Facebook and Twitter) to enhance your experience of the site and to allow us to view the site's performance. If you require any further information regarding these cookies, please contact us at [contactus@ecc.ac.uk](mailto:contactus@ecc.ac.uk)

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

**Information you give to us.** We will use this information:

1. to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us (including those services that we provide to our Members and Clients);
2. to provide you with information about other services we offer that are similar to those that we have already provided or you have enquired about;
3. to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you (for third parties, this will only be for surveys purposes). If you are a Member to our service or a Client, we will only contact you by electronic means (for example, email) with information about goods and services similar to those which we are, or have been, providing to you. If you are a not a Member to our service or existing Client, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please contact us at [contactus@ecc.ac.uk](mailto:contactus@ecc.ac.uk) and we will remove you from those contact lists.
4. to notify you about changes to our service;
5. to ensure that content from our site is presented in the most effective manner for you and for your computer.

**Information we collect about you.** We will use this information:

1. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

2. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
3. to allow you to participate in interactive features of our service (if any), when you choose to do so;
4. as part of our efforts to keep our site safe and secure;
5. to measure or understand the effectiveness of any advertising we serve to you and others, and to deliver relevant advertising (if any) to you;
6. 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 will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **DISCLOSURE OF YOUR INFORMATION**

You agree that we have the right to share your personal information with:

1. If appropriate, any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
2. Selected third parties including:
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with you (whether you are a Member or Client or otherwise). This will include third parties that may assist us with surveys and our software usage. We currently instruct DCSL Software Limited as our software partner (**DCSL**), which subcontracts some of its own services to Rackspace Inc. and / or Microsoft Corporation;
  - if applicable, advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. This will be aggregate information rather than personally identifiable information;
  - if applicable, analytics and search engine providers that assist us in the improvement and optimisation of our site.

We will ensure that these third party contracts are on terms which are substantially the same as those set out in the privacy policy, so that your personal information remains protected. These contracts will also terminate automatically on the termination of any related contract that we have with you (such as your membership with us, if you are a Member). If you do not want us to disclose your personal information to those third parties, please contact us before you enter into a contract with us. This will allow us to discuss the sub-processing with you alongside any alternate solutions.

We will also disclose your personal information to third parties:

1. In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
2. If Educational Competencies Consortium Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its members and clients will be one of the transferred 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 website use and other agreements; or to protect the rights, property, or safety of Educational Competencies Consortium Limited or its members. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

### **WHERE WE STORE YOUR PERSONAL DATA**

We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our, or third party, secure servers within the European Economic Area (**EEA**). We will not transfer your information outside of the EEA without your prior consent. Any payment transactions will be encrypted. 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.

Any information that you provide to us whilst you are a Member or a Client will be retained by us for a period of 12 months following expiry or termination of our services to you. Any other information that we collect (for example, if you make enquiries with us) will be stored for so long as we reasonably require access to, and use of, that information in accordance with the terms of this policy. We keep our storage period under regular review and will not hold any information for longer than is reasonably necessary.

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.

### **YOUR RIGHTS**

You have the right to request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

You have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [contactus@ecc.ac.uk](mailto:contactus@ecc.ac.uk). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

You also have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

In this paragraph, “legitimate interest” means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interest against any potential impact on you in respect of specific activities by contacting us.

### **ACCESS TO INFORMATION**

The Act gives you the right to access, amend, transfer or delete information held about you. Your rights can be exercised in accordance with the Act.

You can also make a complaint about us to the Information Commissioner’s Office, through the following link - <https://ico.org.uk/for-the-public/raising-concerns/>

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to [contactus@ecc.ac.uk](mailto:contactus@ecc.ac.uk).