

PRIVACY POLICY

Including Cookie Policy (Section 14)

BACKGROUND:

Insync Global Education (hereinafter referred to as IGE) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, https://www.insyncglobaleducation.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is accepted when allow our site cookies accept, and when you email us through our website's Contact Us form.

1. **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;]

2. Information About Us

Our Site is owned and operated by IGE, a Limited Company registered in England under company number 8572638

Registered address:	Twelve Quays House, Eggerton Wharf, Wirral CH1 1LD
Postal Address:	Lytchett House, 13 Freeland Park, Wareham Road,
	Lytchett Matravers BH16 6FH
Data Protection Officer:	Data Protection Officer.
Email address:	dpo@insyncglobaleducation.com
Tel. number:	(0044) 07928818036
Postal address:	Lytchett House, 13 Freeland Park, Wareham Road,
	Lytchett Matravers BH16 6FH
Representative:	Data Protection Officer.
Email address:	dpo@insyncglobaleducation.com

Tel. number:(0044) 07928818036Postal address:Lytchett House, 13 Freeland Park, Wareham Road,
Lytchett Matravers BH16 6FH

We are regulated by The Information Commissioner, UK We are a member of the ICO (www.ico.org.uk)

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of **Our** Site. **Our** Site may contain links to other websites. Please note that **We** have no control over how your data is collected, stored, or used by other websites and **We** advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which **we** will always work to uphold:

- a) The right to be informed about **our** collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact **us** to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data **we** hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **us** is inaccurate or incomplete. Please contact **us** using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask **us** to delete or otherwise dispose of any of your personal data that **we** hold. Please contact **us** using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to **us** using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if **we are** relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal

data to **us** directly, **we are** using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask **us** for a copy of that personal data to re-use with another service or business in many cases.

i) Rights relating to automated decision-making and profiling. **[We** do not use your personal data in this way.**]**

For more information about **our** use of your personal data or exercising your rights as outlined above, please contact **us** using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data **we** hold about you changes, please keep **us** informed as long as **we** have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about **our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. **We** would welcome the opportunity to resolve your concerns **ourselves**, however, so please contact **us** first, using the details in Part 15.

6. What Data Do You Collect and How?

Depending upon your use of **our** Site, **we** may collect and hold some or all of the personal [and non-personal] data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about **our** use of Cookies and similar technologies and **our** Cookie Policy accessed via a link 'Cookies Policy', which can be found in the footer of each page of our website

We do not collect any personal data relating to children, NOR data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including: name, and title	Given through our website Contact Form
Contact information including: email address, telephone number	Given through our website Contact Form
Business information including: business name, business location, job title	Given through our website Contact Form
Technical information collected e.g. IP address, browser type and version	Please refer to our cookies policy in Section 14.
Data form Third Parties including technical information, contact information, profile information	Please refer to our cookies policy in Section 14.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, **we** must always have a lawful basis for using personal data. The following table describes how **We** will **OR** may use your personal data, and **our** lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering Our Site.	Please see the Cookie Data in Section 14	
Administering Our business.	We do not administer our business through this website	
Supplying Our services to you.	Our website is used to potential customers and employees or the types of services we offer. Other than information, no products or services are provided through our website	
Managing payments for Our services.	We do not collect any payment information through our site	
Personalising and tailoring Our services for you.	The contact details you have provided.	We do this following discussions with you in response to your request to us to contact you.
Communicating with you.	The contact details you have provided.	We only contact you as an individual if you have provided us with the contact details to do so.
Supplying you with information by email that you have opted-in-to (you may opt-out at any time by using the opt out link on the emails.)	The contact details you have provided.	We will contact you to tell you of job details, which you may be of interest to you.
Supplying you with information by phone that you have expressed an interest in receiving (you may opt-out at any time by emailing us to let us know you no longer wish to be contacted.)	The contact details you have provided.	We will contact you to tell you of job details, which you may be of interest to you.

With your permission and/or where permitted by law, **we** may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text with information, news, and offers on **our** services. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **our** obligations under the Data Protection Legislation and the

Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **We do not** share your personal data with third parties for marketing purposes.

Third Parties (including Squarespace <u>https://www.squarespace.com/</u>; Elfsight <u>https://elsight.com</u>; and 'Google') whose programmes are used on our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that **we** do not control the activities of such third parties, nor the data that they collect and use themselves, and **we** advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If **we** need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, **we** will inform you and explain the legal basis which allows **us** to do so.

In some circumstances, where permitted or required by law, **we** may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information submitted on our Contact Us form (name)	We shall store your information until such time as you inform us that you are no longer interested in our services. We shall contact you annually to conform your continuing interest.
Contact information including email, and phone numbers.	We shall store your information until such time as you inform us that you are no longer interested in our services. We shall contact you annually to conform your continuing interest.
Business information including company name, and your role.	We shall store your information until such time as you inform us that you are no longer interested in our services. We shall contact you annually to conform your continuing interest.
Payment information	We neither collect nor ask for payment information
Profile information	We neither collect nor have the need to ask for profile information such as passwords

Technical information collected	e.g. IP	Please refer to our cookies policy in Section
address, browser type and version		14.

9. How and Where Do You Store or Transfer My Personal Data?

We may store some or all of your personal data in countries outside of the UK. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the <u>Information Commissioner's Office</u>.

Please contact **us** using the details below in Part 15 for further information about the particular data protection safeguard[s] used by **us** when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, **we** take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If **we** sell, transfer, or merge parts of **our** business or assets, your personal data may be transferred to a third party. Any new owner of **our** business may continue to use your personal data in the same way(s) that **we** have used it, as specified in this Privacy Policy.

In some limited circumstances, **we** may be legally required to share certain personal data, which might include yours, if **we are** involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply certain services.

Recipient	Activity Carried Out	Sector	Location
< <insert of<br="" type="">recipient and (optionally) name (also state whether recipient is a data controller or a data processor)>>.</insert>	< <insert simple<br="">description of activity or activities carried out>>.</insert>	< <insert business="" or<br="">industry sector and sub-sector (where applicable)>>.</insert>	< <insert and<br="" country="">(optionally) address or other contact details>>.</insert>

	[< <add further<br="">recipients as required>>]</add>			
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If any of your personal data is shared with a third party, as described above, **We** will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, **Our** obligations, and the third party's obligations under the law, as described above in Part 9.]

If any personal data is transferred outside of the UK, for example, to facilitate a visa process for you, or 'airport meet-and-greet service'. **We** will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

If **We** sell, transfer, or merge parts of **Our** business or assets, your personal data may be transferred to a third party. Any new owner of **Our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **we are** involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

11. How Can I Control My Personal Data?

- 11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via **Our** Site, you may be given options to restrict **Our** use of your personal data. In particular, **We** aim to give you strong controls on **Our** use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from **us** which you may do by unsubscribing using the links provided in **Our** emails **OR** at the point of providing your details.
- 11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

You may access **Our** Site without providing any personal data at all.

You may restrict **Our** use of Cookies. For more information, see Part 14, and **Our** Cookie Policy, accessed via a link 'Cookies Policy', which can be found in the footer of each page of our website.

13. How Can I Access My Personal Data?

If you want to know what personal data **we** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use downloadable from https://www.insyncglobaleducation.com/sarf . You do not have to use this form, but it is the easiest way to tell **us** everything **we** need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover **Our** administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of **our** progress.

14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by **us** and are used only by **us**. **We** use Cookies to facilitate and improve your experience of **Our** Site and to provide and improve **Our** services. **We** have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using **Our** Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than **us**. Third-party Cookies are used on **Our** Site for to enable apps and widgets to work as programmed (e.g. Elfsight's Whatsapp text button, Elfsight's Contact US form, Squarespace use for site analytics). For more details, please refer to the table below. These Cookies are not integral to the functioning of **Our** Site and your use and experience of **Our** Site will not be impaired by refusing consent to them.

All Cookies used by and on **Our** Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a Cookie Consent banner requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling **us** to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of **Our** Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

Certain features of **Our** Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that **Our** Site may not work properly if you do so. **We** have taken great care to ensure that your privacy is not at risk by allowing them.

Our Site uses analytics services provided by Squarespace, and Google. Website analytics refer to a set of tools used to collect and analyse anonymous usage information, enabling **us** to better understand how **Our** Site is used. This, in turn,

enables us to improve Our Site and the services offered through it.

The analytics service(s) used by **Our** Site use(s) Cookies to gather the required information. You do not have to allow **us** to use these Cookies, however whilst **Our** use of them does not pose any risk to your privacy or your safe use of **Our** Site, it does enable **us** to continually improve **Our** Site, making it a better and more useful experience for you.

Name of Cookie	Provider	Party	Purpose	Туре
OptanonConsent	OnerTrust	Third Party	This cookie is set by the cookie compliance solution from OneTrust. It stores information about the categories of cookies the site uses and whether visitors have given or withdrawn consent for the use of each category. This enables site owners to prevent cookies in each category from being set in the users browser, when consent is not given. The cookie has a normal lifespan of one year, so that returning visitors to the site will have their preferences remembered. It contains no information that can identify the site visitor.	Strictly Necessary
OptanonAlertBoxCl osed	OneTrust	Third Party	This cookie is set by websites using certain versions of the cookie law compliance solution from OneTrust. It is set after visitors have seen a cookie information notice and in some cases only when they actively close the notice down. It enables the website not to show the message more than once to a user. The cookie has a one year lifespan and contains no personal information.	Strictly Necessary
Crumb	Squarespace	First Party	This cookie is associated with SquareSpace. It is used to ensure a visitor's browsing security. by preventing cross- site request forgery (CSRF).	Strictly Necessary

The following Cookies may be placed on your computer or device:

Name of Cookie	Provider	Party	Purpose	Туре
_p_hfp_client_id	apps.elfsight.com	Third Party		Functional
ss_cvr	assets.squarespace. com	Third Party		Functional
ss_cvt	assets.squarespace. com	First Party		Functional
cfduid	elfsight.com	Third Party		Functional
Crumb	<u>www.ghostplugins.</u> <u>dev</u>	Third Party		Functional
ss_cvt	www.insyncglobale ducation.com	Third Party		Functional
ss_cpvisit	Squarespace	First Party	This cookie is associated with Squarespace. It is used to assign visitors in to segments, making website advertising more efficient.	Analytical
ss_cvisit	Squarespace	First Party	This cookie is associated with Squarespace. It collects data such as time spent on the website and website interaction.	Analytical
ss_cid	Squarespace	First Party	This cookie is associated with Squarespace. It collects data such as time spent on the website and website interaction.	Analytical
ss_cvr	Squarespace	First Party	This cookie is associated with Squarespace. It identifies unique visitors and tracks their sessions on the site	Analytical

Name of Cookie	Provider	Party	Purpose	Туре
_GRECAPTCHA	Google	Third Party	This domain is owned by Google Inc. Although Google is primarily known as a search engine, the company provides a diverse range of products and services. Its main source of revenue however is advertising. Google tracks users extensively both through its own products and sites, and the numerous technologies embedded into many millions of websites around the world. It uses the data gathered from most of these services to profile the interests of web users and sell advertising space to organisations based on such interest profiles as well as aligning adverts to the content on the pages where its customer's adverts appear.	Analytical

In addition to the controls that **We** provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-todate and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do I Contact You?

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details [(for the attention of Data Protection Officer

Email address:dpo@insyncglobaleducation.com .Tel Number:(0044) 07512778392Postal Address:Lytchett House, 13 Freeland Park, Wareham Road,
Lytchett Matravers BH16 6FH

16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change **Our** business in a way that affects personal data protection.

Any changes will be immediately posted on **Our** Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of **Our** Site following the alterations. **We** recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 02nd March 2021.