

Wired for Education Ltd. – Privacy Notice

We at Wired for Education Ltd. understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of our Clients and everyone else who visits this website, <http://www.wiredformovement.com/> (“our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

The procedures and principles set out in this Notice will be followed at all times by us as a company, as well as our employees, sub-contractors or other parties working on our behalf.

Please read this Privacy Notice carefully and ensure that you understand it. You are deemed to have accepted our Privacy Notice when you first use our Site. If you do not accept and agree with this Privacy Notice, you must stop using our Site immediately.

1. Definitions and Interpretation

In this Notice, the following terms have the following meanings:

“**Client**” means any individual, firm or corporate body to which we provide our services;

“**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 section 11, below;

“**Data Protection Laws**” means the General Data Protection Regulation 2016/679 (“GDPR”) and Data Protection Act 2018;

“**Personal data**” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us by becoming a Client of ours or by visiting our Site. This definition shall, where applicable, incorporate the definitions provided in the applicable Data Protection Laws; and

“**We/Us/Our**” means Wired for Education Ltd., a company registered in England and Wales under number 12518129, whose registered office is at 63 Bedford Road, Cranfield, Bedford, England, MK43 0EX.

2. What Does This Notice Cover?

1. This Privacy Notice applies to our use of personal data collected when you become a Client of ours, when you enquire about our services or when you visit our Site.
2. Our Site may contain links to other websites, including social media links. 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.

3. Your Rights

1. As a data subject, you have the following rights under the applicable Data Protection Laws, which this Notice and our use of personal data have been designed to uphold:
 1. The right to be informed about our collection and use of personal data;
 2. The right of access to the personal data we hold about you (see section 10);
 3. The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 12);
 4. The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 5 but if you would like us to delete it sooner, please contact us using the details in section 12);
 5. The right to restrict (i.e. prevent) the processing of your personal data;
 6. The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 7. The right to object to us using your personal data for particular purposes; and
 8. Rights with respect to automated decision making and profiling.
2. If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 12 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.
3. For further information about your rights, please contact the Information Commissioner’s Office or your local Citizens’ Advice Bureau.

4. What Data Do We Collect and How Do We Use Your Data?

1. We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:
 1. **Identity Data** includes first name, last name, title, username or similar identifier.
 2. **Contact Data** includes billing address, site address, email address, and telephone numbers.
 3. **Financial Data** includes bank account and payment card details.
 4. **Transaction Data** includes details about payments to and from you, and other details of services you have purchased from us.
 5. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site.
 6. **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
 7. **Usage Data** includes information about how you use our Site and services.
 8. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, and your communication preferences.
2. All personal data is processed and stored securely, for no longer than is necessary or statutorily required in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the applicable Data Protection Laws at all times. For more details on security see section 5, below.
3. Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

| Purpose/Activity | Type of Data | Lawful basis for processing including basis of legitimate interest |
|---|--|---|
| To commence working with you as a new or returning client | Identity Contact | Performance of a contract with you |
| To deliver our services to you, including: (a) Managing payments (b) Collecting and recovering money owed to us | Identity Contact Financial Transaction Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or website policies (b) Asking you to leave a review or take a survey | Identity Contact Profile Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services) |
| To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | Identity Contact Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | Identity Contact Profile Usage Marketing and Communications Technical | Necessary for our legitimate interests (to study how clients use our services, to develop our services, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our Site, services, marketing, client relationships and experiences | Technical Usage | Necessary for our legitimate interests (to define types of clients for our services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about services that may be of interest to you | Identity Contact Technical Usage Profile Marketing and Communications | Necessary for our legitimate interests (to develop our services and grow our business) |

4. With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the applicable Data Protection Laws and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
5. Third parties whose content appears on our Site may use third party Cookies, as detailed below in section 11. Please refer to section 11 for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
6. You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. Unless we have reasonable grounds to refuse to delete it (where this is permitted under the applicable Data Protection Laws), we will do so without delay and within no longer

than one month from receiving your request.

7. We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

5. How and Where Do We Store Your Data?

1. We only keep your Personal Data for as long as we need to in order to use it as described above in section 4, and/or for as long as we have your permission to keep it.
2. We will only store your data in the UK, however, third party processors we use may store data elsewhere, as set out in section 6.
3. Data security is very important to us and to protect your data, we have taken suitable measures to safeguard and secure data collected.

6. Do We Share Your Data?

1. We may sometimes contract with other third parties to supply services to you on our behalf, such as sub-contractors, and in some cases, these third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
2. We may compile statistics about the use of our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
3. We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where we transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the applicable Data Protection Laws.
4. In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

7. What Happens If Our Business Changes Hands?

1. We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use that data only for the same purposes for which it was originally collected by us.
2. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

8. How Can You Control Your Data?

1. In addition to your rights under the applicable Data Protection Laws, set out in section 3, when you submit personal data to us via email or via our Site, you may be given options to restrict our use of your 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 and at the point of providing your details).
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.

9. Your Right to Withhold Information

1. You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.
2. You may restrict our use of Cookies. 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.

10. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Please contact us for more details using the contact details below in section 12.

11. Our Use of Cookies

1. All Cookies used by and on our Site are used in accordance with current Cookie law.
2. We may place and access the following first party and third-party Cookies on your computer or device, to facilitate and improve your experience of our Site and to provide and improve our services:

| Cookie Name | Description & purpose |
|-------------|-----------------------|
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3. First party Cookies are those placed directly by us and are used only by us. Third party Cookies are those placed by websites, services, and/or parties other than us. 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.
4. Before Cookies are placed on your computer or device, you will be shown a pop-up 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.

5. Certain features of our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are also shown above. 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 in clause 10.2, 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.
6. Our Site uses Google Analytics. Website analytics refers 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. 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. Google's privacy policy is available at: www.google.com/policies/privacy
7. 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.
8. It is recommended that you keep your internet browser and operating system up-to-date 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.

12. Contacting Us

If you have any questions about our Site or this Privacy Notice, please contact us by email at monty@wiredformovement.com Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 10, above).

13. Changes to Our Privacy Notice

We may change this Privacy Notice from time to time (for example, if the law changes). Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Notice on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.