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# Active IQ privacy policy

# Introduction

Welcome to Active IQ Ltd.'s ('Active IQ') privacy policy.

Active IQ respects your privacy and is committed to protecting your personal data. This privacy policy provides information on how Active IQ collects and processes your personal data when you visit our website, sign up for a newsletter, and purchase a product or service. This privacy policy applies whenever we act as a data controller with respect to the personal data users of our products and services or visitors to our website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition.

### Who we are

Active IQ is an approved awarding organisation and is regulated in line with section 134 of the Apprenticeships, Skills, Children and Learning Act 2009. As such, Active IQ has a legal obligation to comply with the General Conditions of Recognition issued by its regulators. In performing its duties as an awarding organisation, for the design, development, award and certification of its regulated qualifications, Active IQ therefore has a legitimate business interest in providing materials and information (including marketing) for business purposes.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them. In this privacy policy, the websites, including their content, and our mobile products, if any, and services, are our '**websites**', and our products and services are our '**services**'.

### Authority to collect your data

This privacy policy applies to our websites, services and the other ways in which we interact and collect information from you as described below.

We collect data in order to fulfil a variety of obligations, both mandatory and optional in order to fulfil our different obligations.

We require centres, training providers and employers to make learners/apprentices aware of this requirement. The information we collect is for legitimate purposes in order to perform our duties in providing services to you. Without the information listed within this policy, we would not be able to carry out our duties for you effectively.

Under applicable law, we collect and process your data on one or more of the following bases:

- **consent**: By visiting or using our websites or services, or otherwise interacting with us (such as by email, chat, posting, etc., or by accepting this privacy policy, you consent to the collection, use and sharing of your information as described in this privacy policy. With respect to marketing information relating to our services, if you opt in to receive such information and resources via email/website/other methods, you are granting consent. There are certain uses where we will not put personal information without your specific consent, e.g. publicity material
- legitimate interests and contractual obligations: For example, to deliver contracted services to you, services to centres, training providers, employers and other interested parties or to ensure we provide you with optimised website experiences. We may use an individual's personal information to contact them directly. We may provide personal information to those outside Active IQ to assist us in providing services to you; for example, in obtaining expert reports, additional training support, for development of improved web/IT services (e.g. Parnassus, EPA Pro or other platforms engaged with by Active IQ)
- legal and other obligations: For example, for data or other monitoring requirements of our regulators; as required by law, in rare circumstances to local or public authorities including the police; to assist with complaints, appeals or other internal formal or enforcement processes
- research and development: We may use personal data in conducting research, performance analysis or other management and statistical purposes in order to develop and improve services we offer. We do not process information of this type where we perceive a detriment to you in us doing so

**Please note:** Where we need to collect personal data by law or under the terms of a contract we have with you or your institutions, or due to requirements of a government agency that is directly involved in your use of the services, such as a regulatory body or funding agency ('government agency'), and you fail to provide that data when requested, we may not be able to provide access to our services. In these cases, we may have to cancel a product or service you have with us but we will notify you at the time if your access is unallowed or suspended.

# About our use of your data

### How we collect your data

We may collect information directly from you or from a third party who is authorised by you or otherwise permitted by applicable law to share information with us (for example, your school or employer).

We collect personal information in the following ways:

- **visits to our websites:** When you browse or request information about our services through our websites, these actions typically require that you provide us with contact information (name, address, phone numbers and email addresses)
- **registration:** When you create an account for our services, or register or login to access our services or use functions or features. These actions typically require that you provide us with your contact information, user ID and password, and, in some cases, your employer, school, centre, apprenticeship provider or a government agency (together, 'your institutions')
- forms you complete: When you complete forms that are shared with us by your institution, in order to advance your use of our services and to provide funding for the services
- make a purchase: When you make a purchase from our online store, you provide us with your contact information. (We use a third party to process credit card transactions and we do not collect, use or store credit card information)
- **communications**: When you communicate with us for support, or by email, phone, through the websites or otherwise, you might provide us with personal information. Some communications may be mandated by regulation
- **learning activities**: When you use our services, we collect information about your performance, your personal learning behaviours, and various metrics related to your learning of particular subject matters
- **surveys and research**: If you participate in our research studies about our products or the industries and professions we support, or our market research surveys or programmes, you might provide us with contact or other personal information
- **forums**: If you participate in our forums, blogs, intranets, chat rooms, 'wikis' or other similar features, you might provide us with personal information
- **subscriptions**: If you subscribe to one of our publications or request text alerts, you provide us with contact and preference information
- social media: If you interact with us on social media and networking pages and applications, such as Facebook, Instagram, or LinkedIn, or post to our web pages, you might provide us with personal information, even though not requested or required by us, in the content of your posts
- **outside sources**: We might receive information about you from outside sources, including personal information provided to us by your institutions, and from other

sources such as our service providers

automated sources: We collect certain information by automated means when you access or use our websites and services. This information may include, for example, usage details, internet protocol ('IP') address, browser type, browser language, devices you use, access times, the sites linked from, pages visited, applications downloaded or accessed, links and features used, content viewed or requested, and other information collected through cookies. (To learn more, please see our 'Cookies and tracking devices' section below.)

### The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We distinguish between the information we collect from users of our services ('**service user**') and data that we collect from visitors to our websites ('**visitors**').

From service users, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows ('**service user data**'):

- registration information includes your contact information (name, address, phone numbers and email addresses), information required by regulators or your institutions (date of birth, gender, ethnicity (optional) and your Unique Learner Number if one exists), user ID and password, and your institution(s)
- **learning activities information** includes the information generated by the service user when interacting with the services, such as your performance, your personal learning behaviours, and various metrics related to your learning of particular subject matters
- **outside sources information** includes information your institution(s) might provide us with, information or forms that relate to your use of the services, your advancement through the services or funding for the services
- financial data includes (bank account and payment card details)
- **technical data** includes metadata generated by the use of the services and certain data collected by automated means, such as your login data, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use when interacting with the services. (*To learn more about cookies, please see our 'Cookies and tracking devices' section below.*)
- marketing and communications data includes your preferences in receiving marketing from us and our third parties, and your communication preference

From visitors, we collect personal information provided to us outside of our services through the channels described above ('**visitor data**'). This might include contact information, data provided to us through surveys, automated sources of information, information you post through a forum, chat, on our social media etc., or provide to us by email or other means of communication to, for example, request information from us.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your technical data to calculate the percentage of users accessing a specific services feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We may collect demographic information concerning ethnicity and gender but only if we are required to do so by government agencies or our regulatory bodies, or if you provide the data on a voluntary basis. We do not collect any other special categories of personal data about you (this includes details about religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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.

### How we may use your data

We may use your personal information, either directly or through a third party, in the following ways:

- to provide our services to you
- to fulfil your requests for services and communicate with you about those requests
- to set up your account and verify your identity when you register for our services
- to monitor, record, analyse and report on your activity, interactions and engagement with our services
- to fulfil requirements imposed by government agencies on you, us, your institution or others related to your use of our services
- to track, analyse and report on your progress, success, results, performance, registrations, incomplete attempts, and results in connection with our services
- to perform, research and analyse to learn about our users' interests, to further develop and improve our services, and regarding the industries and professions we serve

- to perform benchmarking, analytics and general metrics about your performance
- to assess your institution's performance as compared to other employers, schools, centres, and apprenticeship providers after anonymising and aggregating the data
- to analyse technical data such as cookies, content viewed, IP address, device use, site volume and load to improve our websites and services
- to verify compliance with our license terms
- to support and personalise our services, websites and advertising
- to inform you of new products, services or promotions we may offer
- to engage you on our social media platforms
- to protect the security and integrity of our services, websites, content and our business
- to respond to reviews, comments, or other feedback you provide us with
- to comply with applicable legal or regulatory requirements and our policies, and protect against unlawful activity, claims and other liabilities
- for any other lawful purpose for which the information is provided
- we also may collect, use, process, transfer, and store any data about you in an anonymous, aggregated format

### Please note these other considerations:

- End-point Assessment: Active IQ is a data controller and collects and processes personal data for the performance of End-point Assessment from employers to enable the processing of assessments for apprentices. It is the responsibility of the employer to ensure that apprentices are aware of and have consented to their data being shared with Active IQ, and that data will be shared with in-house and associate End-point Assessors, IQA personnel, Active IQ and applicable regulators
- **Centres:** Active IQ is a data controller and collects and processes personal data and provides authority to approved centres to collect data (as data processors) and provide this information to Active IQ, in order that it may perform its legal obligations to comply with the General Conditions of Recognition. It is important that centres make sure all those responsible for the delivery, assessment and award of Active IQ qualifications are aware of and have consented to their data being shared with Active IQ, who will be required to share data with its regulators

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose/activity	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Performance of our obligations to you
To process and deliver your order including: (a) manage payments, fees and charges (b) collect and recover money owed to us	<ul> <li>a) performance of our obligations to with you</li> <li>b) necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To fulfil regulatory and government requirements imposed upon you, us, your institution or others related to your use of our services. This may include information about ethnicity and gender.	<ul><li>a) performance of our obligations to you</li><li>b) legal or regulatory obligation</li></ul>
To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy (b) asking you to leave a review or take a survey	<ul> <li>a) performance of a contract with you</li> <li>b) necessary to comply with a legal obligation</li> <li>c) necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
To conduct research or benchmarking to improve quality, training and security	a) necessary for our legitimate interests (to continually improve our services)
To enable you to partake in a prize draw, competition or complete a survey	<ul> <li>a) performance of a contract with you</li> <li>b) necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	<ul> <li>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</li> </ul>

maintenance, support,	exercise)
reporting and hosting of data)	b) necessary to comply with a legal obligation
To deliver relevant website	Necessary for our legitimate interests (to study how
content and advertisements	customers use our products/services, to develop them, to
to you and measure or	grow our business and to inform our marketing strategy)
understand the effectiveness	
of the advertising we serve to	
you	
To use data analytics to	Necessary for our legitimate interests (to define types of
improve our website,	customers for our products and services, to keep our
products/services, marketing,	website updated and relevant, to develop our business and
customer relationships and	to inform our marketing strategy)
experiences	
To make suggestions and	Necessary for our legitimate interests (to develop our
recommendations to you	products/services and grow our business)
about goods or services that	
may be of interest to you	

# How we DO NOT use your information

We collect, use, process and store service user data separately from Data in our systems.

In addition:

- we **do not** use Service User Data for marketing purposes or permit such data, if shared with others (as described in the next section), to be used for marketing purposes, unless you have opted in to receive marketing form us or the data has been aggregated so that it is no longer identifiable
- we **do not** combine Service User Data with personal information about you from other sources, except for personal information about you provided to us by you, Your Institution or a related Government Agency
- we **do not** sell, rent, lease or otherwise provide any personal information to others for monetary or other valuable consideration
- we have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate

We will not market to you unless you have opted-in to receive information from us or our partners (such as CIMPSA and FitPro). If you have opted in to receive marketing information, you can opt out at any time by contacting us.

# **Information sharing**

To the extent permitted by applicable law, we may share information about you, including your personal information, as set forth below or as otherwise described in this privacy policy or the terms and conditions for use of the services:

- **affiliates and agents:** We may share information with our parent corporations and affiliates (or any business partner or agent acting on our behalf) as necessary to provide you with the services. Each such parent corporation, affiliate, business partner, and agent will be under the same obligations as is Active IQ to protect the confidentiality of your information and protect your privacy
- **analytics and reporting:** We may share your information to analyse and provide certain information about your learning performance to you, your institutions, including other parties associated with and required by your institution, and your trainers, assessors, other parties from or related to your institution or related government agencies
- service providers: We may share information with agents, contractors, service providers, vendors, business partners, and other third parties we use to support our business and services. We may share information to provide technical support to you and your institution or related government agencies. Some examples of third parties we work with are shippers, payment servicers, information processors, financial institutions, data centres, your institution(s), other organisations you are affiliated with, or their support service providers. Such third-party providers may perform technical operations such as database monitoring, data storage and hosting services, and customer support software tools. Such third parties may access, process or store personal data in the course of providing these services
- your institution and other organisations: We may share information about your use of our services with your institution and its faculty or staff, and other parties associated with or required by your institution. We may also share information with government agencies, oversight organisations, professional organisations, certification or accreditation organisations, and industry self-regulatory organisations, including any awarding organisations with whom we offer joint or collaborative services
- **our regulatory bodies:** As an approved awarding organisation, we provide information to the following regulatory bodies: Ofqual, Qualifications Wales, CCEA Northern Ireland, IfATE, ESFA, and End-point Assessment quality assurers, e.g. Ofqual and People 1st
- **disciplinary matters:** We may be required to share information about an individual or a centre where an investigation yields evidence of serious malpractice. Typically, such matters are reported to government agencies, our regulatory bodies and your institution, but may also be reported to law enforcement
- **fraud prevention:** We may share your information to confirm your identity to ensure only authorised users are accessing our services and for general security
- advertising and marketing: To the extent permitted by applicable law, we may share information with third parties for marketing, advertising, promotions, contests, or other similar purposes. If required by applicable law, we will share such data for advertising

and marketing purposes only in an aggregate, anonymous, and de-identified manner

- mergers, acquisitions, divestitures: We may share, disclose or transfer information about you to a buyer, investor, new affiliate, or other successor in the event that Active IQ, its parent companies or affiliates, or any portion, group or business unit thereof, undergoes a business transition, such as a merger, acquisition, consolidation, reorganisation, divestiture, liquidation or dissolution (including bankruptcy), or a sale or other transfer of all or a portion of any assets or during steps in contemplation of such activities (e.g. negotiations and due diligence)
- **law enforcement and national security:** We may share information to comply with any law or directive, judicial or administrative order, legal process or investigation, warrant, subpoena, government request, regulatory request, law enforcement or national security investigation, or as otherwise required or authorised by law
- protection of rights, property or safety: We may also share information if, at our sole discretion, we believe disclosure is necessary or appropriate to protect the rights, property or safety of any person, or if we suspect fraud, illegal activity, abuse or testing misconduct has taken place

We also may share information to fulfil any other purpose for which you have provided information to us; for any other purpose disclosed by us or the third party with whom you are interacting when you provide the information; to enforce our rights arising from any contracts; for billing and collection; or as otherwise permitted under applicable law.

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### How will we store your data

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.

We use a combination of organisational and technical methods to protect your data from unauthorised access and/or accidental loss. Where we use third parties to process personal information (centres, employers, training providers), we also require them to adhere to the same levels of security and protection.

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. 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. Active IQ has procedures in place to deal with any suspected breach of requirements under its obligations to its regulators and by law. You and/or any regulator will be notified of any potential or actual significant breach.

Please note that any personal information that you voluntarily post via public platforms (for example, within a forum on the Active IQ eLearning platform) may become accessible to others. We cannot be held responsible for any personal information you have shared, whether in this manner or any other way.

# How long we keep your information

The amount of time we hold your information depends on the reason it was provided and the requirements of regulatory bodies and government agencies. Your data will not be kept indefinitely and will only be kept for as long as is required for legitimate business reasons (for example, to provide you with our services or for the other reasons we explained above), in order for us to comply with our legal and regulatory obligations, to fulfil our obligations as an awarding organisation in the authentication and certification of qualifications for learners/apprentices, and for any other legal purpose.

The personal information we receive when you make an application (whether on our website or which comes to us via one of the websites of our affiliates) is kept for a minimum of six years, which will commence at the end of the relationship, to ensure that if any disputes or complaints are raised, we have your information to enable us to address the complaints or disputes. Notwithstanding the foregoing, we may be required to keep the information for a longer time period depending on the requirements of your institutions, government agencies and our regulatory bodies related to your use of our services. Also, if you request that we do not contact you for advertising and marketing reasons, we will need to keep some of your information to retain your preferences.

If you have exercised the right to be forgotten and we have removed your data, we will not be able to provide replacement certificates.

# **International transfers**

### **UK residents**

We maintain your data on secured servers located in the UK or cloud servers that are, by contract, located in the UK. We do not typically transfer personal data outside the UK but on occasion we may use staff or services that are located outside the UK, most typically staff or services of our ultimate parent company which is located in the US, or developers located in India. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside the UK in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy. Please contact us should you wish to have further information in respect of international transfers.

### **EEA residents**

Where personal data needs to be transferred to countries outside the UK or European Economic Area ('EEA'), we will take appropriate steps to ensure your personal information is afforded a similar degree of protection by ensuring at least one of the following safeguards is implemented:

- 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. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries
- where we use certain service providers, we may use specific contracts approved by the European Commission that give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### Your rights

You have the following rights regarding the processing of your personal data, given to you through legislation:

#### The right to be informed

You have a right to be informed about how your personal data is processed in a concise, transparent, intelligible and easily accessible manner, written in clear and plain language, that is free of charge. This is the purpose of this privacy policy.

#### The right of access

You have the right to obtain confirmation that your data is being processed and to receive information about that personal data.

### The right to rectification

You have the right to have your personal data rectified if it is incorrect or incomplete, and we must notify any third parties with which we have shared your data to do the same.

### The right to erasure

You have a 'right to be forgotten', or to have your personal data erased and to prevent processing. The right is not absolute and in certain circumstances this may not be possible (for example, where we have to keep your personal data for legal or regulatory reasons). We must notify any third parties with whom we have shared your data of your request.

### The right to object to processing

You have the right to object to the processing of your personal data. **Please be advised** that if you ask us to stop processing your data, you will not be able to continue using our services. Also, halting processing of your data does not stop the storing of your personal data, as it may be required to restrict processing in the future. We will notify any third parties with whom we have shared your data of your request.

### The right to data portability

You have the right, under certain circumstances, to ask that we transfer your personal data to another third party. Our ability to facilitate a request to transfer will depend on whether your data is subject to regulatory or governmental restraints.

### The right to withdraw consent

If you have given us explicit consent to process your personal data, you have a right to withdraw that consent at any time, including but not limited to the removal of consent to be contacted for marketing purposes. **Please be advised** that if you remove your consent to allow us to process your data, you will not be able to continue to use our services.

### The right to lodge a complaint with a supervisory authority

We always encourage you to contact us if you have any concerns about how we use your personal information, and we will do our best to resolve your concerns. Where you feel that we have not addressed your concerns appropriately, please contact our Data Protection Officer using the information provided in the *Contacting us* section of this privacy policy. However, you have a right to complain to the Information Commissioner's office if you believe that any use of your personal information by us is in breach of applicable data protection laws and/or regulation. You can find their contact details here: <u>https://ico.org.uk/global/contact-us/</u>

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 could refuse to comply with your request in these circumstances.

If you would like to act on any of your rights, please <u>contact us</u>. We try to respond to all legitimate requests quickly and within the timeframe specified by the applicable law or regulation. Occasionally, it could take us longer 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.

### **Other concerns**

#### Cookies

When you visit our websites, you are offered an opportunity to accept our placement of cookies. Although you are not required to accept cookies from us, if you block or reject them, you may not have access to all of the features available through our websites or services, such as tests, training or other activities.

We may use cookies and similar technologies to operate and improve our services, as well as to simplify our interactions with you.

A 'cookie' is a unique numeric code that we transfer to your computer so that we can keep track of your interests and preferences, and recognise you as a return visitor to the websites. In addition, we may use log files, pixel tags, web bugs, web beacons, clear GIFs, local storage objects (LSOs) such as HTML5 and Flash, or other similar technologies to collect information about the ways you interact with and use our services, to support and enhance features and functionality, to monitor performance, to personalise content and experiences, for marketing and analytics, and for other lawful purposes as described above.

We may use the following types of cookies:

- **strictly necessary cookies** required for the operation of our websites and services. They include, for example, cookies that enable you to log in to secure areas
- analytical/performance cookies that collect information about how you use our websites and services. They allow us to recognise and count the number of visitors and to see how visitors move around our websites. This helps us to improve the way our websites work. These cookies are sometimes placed by third-party providers of web traffic analysis services, such as Google Analytics. For information on how Google processes and collects your information regarding Google Analytics and how you can opt out, please see: <u>https://tools.google.com/dlpage/gaoptout</u>
- **functionality cookies** that remember choices you make and recognise you when you return. This enables us to personalise our content, greet you by name and remember your preferences (for example, your choice of language or region)
- **targeting cookies** that collect information about your browsing habits such as the pages you have visited and the links you have followed. We use this information to make our websites more relevant to your interests, and, where utilised, make advertising more

relevant to you, as well as to limit the number of times you see an ad. These cookies are usually placed by third-party advertising networks. They remember the other websites you visit and this information is shared with third-party organisations such as, for example, advertisers. *We do not use targeting cookies as part of our services*.

Most internet browsers accept cookies by default. Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies, or to alert you when a cookie is placed on your computer, tablet or mobile device. For more information, visit the help page for your web browser, or <u>http://www.allaboutcookies.org</u> or <u>www.youronlinechoices.com</u> which have further information about behavioural advertising and online privacy.

We may use third-party advertisers to serve or track advertisements on our websites or relating to the services. These third parties may use cookies and other tracking and analytical technologies to, for example, record which ads your browser has loaded and which pages you were viewing when ads were delivered or accessed. Information collected by third parties is subject to the privacy policies of those third parties. **We recommend that you carefully read their policies.** 

### Links from our websites

Our websites or services may contain links to third-party websites, platforms, products, services or applications that are independent of Active IQ. We provide such links to you only as a convenience, and the inclusion of any link does not imply affiliation, endorsement or adoption by Active IQ of any site or any information contained therein.

When you leave our websites, our policies will no longer govern your internet browser session. It is your sole responsibility to review the applicable policies of other websites as the information collection practices and privacy policies of those websites will govern and may differ from ours. **We recommend that you carefully read their policies.** 

# **Contacting us**

You may contact our data protection office if you have any questions about how we collect, store or use your personal information.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Data Protection Officer Active IQ Dryden House St John's Street Huntingdon, Cambridgeshire, PE29 3NU

Email: <a href="mailto:compliance@ascendlearning.com">compliance@ascendlearning.com</a>

### Updates to this privacy policy

We may update this privacy policy periodically. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page. We encourage you to periodically review this privacy notice so that you will be aware of our privacy practices.