

CAPITAL CITY TRAINING & CONSULTING

Privacy Policy

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Policy Approval

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Signature	
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In compliance with the new GDPR requirements, we have updated our Privacy Policy. Your privacy is extremely important to us so we want you to know exactly what kind of information we collect about you and how we use it.

We've set out all the details below.

Please take the time to read and understand this policy. And bear in mind that by using our website, e-learning site, and mobile apps, or contacting us by telephone or providing information to us by way of social media, you agree to its terms.

To help you, we've included some links to other websites. It's worth remembering though that other people, not us, control these websites. We're not responsible for them.

What information do we collect and when?

We only collect information that we know we will genuinely use.

1. What information may we collect?

All information you choose to submit to us. You can do that in a number of different ways:

- By filling in forms, for example when you sign up to news.
- By sending us emails and text messages (SMS or MMS).
- By adding posts, reviews and other comments to any of our websites, mobile apps or other community forums.
- By interacting with us on social media platforms such as Facebook or Twitter etc.
- By talking to us in person or over the telephone. For example, when enquiring about training or making a complaint.
- By registering accounts on our website, e-learning site or mobile apps including setting up passwords and preferred user names, contact details, account details, details of friends and relatives, your preferences and interests.

(Important: If you submit details to us of any other person (e.g. a friend) please make sure you have their permission first.)

- Sensitive information on you. And by sensitive we mean information such as your racial or ethnic origin, religious beliefs or other beliefs of a similar nature and your physical condition (e.g. if you're pregnant). We ask for a fair amount of this kind of detail in the forms you fill in, and you can choose whether or not you want to provide it. However, we may also acquire it through social media or as a result of our analysis of your preferences and behaviours (see below).
- Full details of the purchases you make on our website, e-learning site or through our mobile apps. These include the time, date and location of purchase; the products you buy from us; any relevant delivery address; any vouchers, coupons or other alternative means of payment you may use, as well as relevant payment cards such as a credit or debit card.
- Information on what you view, click on and access by way of our marketing emails and text messages (SMS or MMS), websites and mobile apps. We may collect the time and geographic location of your device when you do so. For websites, this information may also include where you came to our site from, and where you went when you left it. We also track how often you visit and use our websites and mobile apps. We do this via email and website cookies and similar tracking technology built into our mobile apps. We make cookie policies available on each of our websites to give you more detailed information on how we use them.
- Your social media content where this is in the public domain, and any messages you send direct to us via social media. This information can include posts and comments, pictures and video footage on sites such as YouTube, Facebook and Twitter. You should always review the terms and conditions and privacy policies of the social media that you use to make sure you

understand what kind of information relating to you may be out there in the public domain and how you can stop or limit it from happening.

- Basic background information on you from government and other external sources. We may also check the electoral roll to make sure any information we have remains reasonably accurate and, if necessary, to fill in any gaps.
- Information collected independently by online advertising networks (Google for example) through which we place advertisements. The information we get from them varies from network to network. It often summarises the actions of lots of people, and so does not allow us to identify you individually. It relates to what you view, click on and access through websites in their network, including the subject matter of the site you started at and which sites you go to after that. It may also include their analysis of your online behaviour across the wider internet and a profile of you. If you're not happy about this, you should look for Settings and Do Not Track options in online advertisements and in the privacy and cookies functions on your devices. You should also consider changing your settings to block third-party cookies in particular. We do not control these cookies and we suggest you check these third-party websites for more information about the cookies they use and how you can manage them.

2. How do we use your information?

We use the information we collect for the following reasons:

- To help you purchase appropriate training from us in person and online. For example, we may need to know your credit or debit card details so that we can take payment and provide you with a receipt.
- To get feedback from you about our products, website, e-learning site, mobile apps, and other services and activities. For example, occasionally we may invite you to review a product or service you've bought or used from us. If we do, it's possible that we'll use independent research and feedback providers to act on our behalf.
- To contact you from time to time regarding things you've told us you want to hear about. If you stop using our services, we may try and tempt you back to us.
- To reply to any questions, suggestions, issues or complaints you have contacted us about.
- To respond to any social media posts or other public comments you might make, whether they are directly to us or about us, our products, website, e-learning site, mobile apps, services or other activities.
- To advertise products or services to you for example on your favourite social media sites (e.g. Facebook and Twitter) or on our mobile apps. Please note that these may be in the form of a link to someone else's website.
- To tell you about any changes to our products, services, website, e-learning site and mobile apps.
- To make a contract with you. But also to enforce a contract if you don't honour it, including the collection of any debts that we may be owed by you.
- To gather statistics about how you and other people use our website, e-learning site and mobile apps and what you think of our advertisements, special offers, news, products and product information, social media and other content and services. We then analyse all this data to see if what we do is interesting to people and meets their needs, or if they should be improved, and if so, what changes would be most beneficial both for our customers and for us.

- To monitor how people use our website, e-learning site and mobile apps to see if they are being abused or threatened, for example, by internet trolls posting inappropriate comments in review areas or by would-be hackers looking to undermine our security.
- To protect you and our business from any other potentially criminal behaviour, including identity theft and fraud.

Our aim, quite simply, is to provide a great service and value to you in everything we do.

By knowing more about you, we're able to focus on the things we think are most likely to appeal to you, especially when we send you special offers, news and information on our courses.

To help us maintain administrative and statutory records about our business so we can better understand what we've sold, and how, when, where and at what price, and pay our taxes.

To enable us (and our third-party service providers) to plan and manage our day-to-day business as effectively as possible.

To help us conduct focused research, so we can further improve the products and services we offer to all our customers.

To test new systems and processes as we roll them out (but generally only in anonymous form) to make sure they work correctly and meet the exceptionally high standards we set for ourselves.

To assist us in the development of new products and services over a period of time. For example, we may need to gauge whether a new product is likely to appeal to a large proportion of our customer base. And if not, we'll want to know why.

To see if the money we spend on marketing and advertising across all media represents good value for us or not.

3. Who do we share your information with?

We can't run our business or provide many of the services and benefits you receive from us without involving other people and organisations from time to time. When we share your information, we want you to know that we only do so in accordance with our legal data protection and privacy obligations.

Your information may be disclosed to:

- Other people who help us provide our website, e-learning site, mobile apps, and related services to you. They include information technology experts who design and host our website, e-learning site and payment services companies that make it easy for you to use your credit or payment cards with us. Other examples include market research companies, marketing, advertising, design and PR organisations and general service companies such as printers, mailing houses and form-scanning service providers.
- Our insurers and insurance brokers who provide us with comprehensive cover against the risks of running a business as big as ours. (They may keep this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.)
- Banks and finance companies where we have allowed them to offer you the possibility of buying our products on credit. (They may keep this information for their related banking and finance purposes)
- With social media companies such as Facebook and Twitter, and our advertising partners to enable us to run targeted promotions for you on their platforms;

- Any new business partners we may have over time, for example, in the event of a joint venture, reorganisation, business merger or sale that affects us.
- Our professional advisors including our lawyers and technology consultants when they need it to give us their professional advice.
- The Police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts and any other government authority if they ask us to do so (but only if us doing so is lawful).
- Other people who make a subject access request, where we are allowed to do so by law. (See Managing Your Information below for what we mean by a subject access request.)
- We may also share the information we collect where we are legally obliged to do so, e.g. to comply with a court order.

4. Social media, blogs, reviews, etc.

Any social media posts or comments you send to us (on the Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written and could be made public. Other people, not us, control these platforms. We're not responsible for this kind of sharing. So before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it.

It's worth remembering too, that any blog, review or other posts or comments you make about us, our products and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large.

You should take extra care to ensure that any comments you make on these services, and on social media in general are fit to be read by the public, and are not offensive, insulting or defamatory. At the end of the day, you are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

5. Mobile app platforms

Our mobile apps run on third party software platforms, for example, Apple's iOS platform which powers Apple's iPhone and Google's Android platform which powers Android-based smartphones.

If you use any of our mobile apps, your usage of those apps is also subject to the relevant mobile app platform provider's terms and conditions and privacy policy. You should review their terms and conditions and privacy policy to ensure you understand what information (if any) they will gather on you, how they will use that information, and what you may be able to do if you are unhappy about it.

Order Payments

When ordering products online, a third party (such as Amazon for Kindle books) will process your credit or debit card data. This data is handled according to Payment Card Industry Data Security Standard (PCI-DSS) compliant rules and processes. We reveal only the last four digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.

PCI-DSS requirements help ensure the secure handling of credit card information by our online store and its service providers.

6. International transfer of your information

Although we're based in the UK, we use suppliers from many parts of the world to help ensure you receive the very best in products and services from us.

To allow us to run our business on this basis, the information we collect may on occasion be transferred to, stored and used at premises in other countries including the United States of America.

Naturally, we aim to ensure all our suppliers take information security as seriously as we do.

Even so, information protection laws can vary from country to country.

For instance, the law of the country in which you are resident or domiciled may offer a higher standard of protection than the laws in the UK and/or the other countries in which we store and use the information we collect. Any transfer of information we make to other countries could result in that information being available to their government and other authorities in those countries under their laws.

7. Security of your information

A lot of the information we receive reaches us electronically, originating from your device and then transmitted by your relevant telecoms network provider.

Where it's within our control, we put measures in place to ensure this in flight data is as secure as it possibly can be.

And once it arrives, you can be sure we take the security of your information very seriously.

If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of Get Safe Online.

8. How long do we keep your information for?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need them for the purposes we acquired them in the first place (as set out above).

In most cases, this means we will keep your information for as long as you continue to conduct business with us or use our services, and for a period time afterwards if you stop doing so, to see if we can persuade you to come back to us.

After that we will either delete it or anonymise it so that it cannot be linked back to you.

9. Managing our marketing communications

We provide ways for you to stop all email communications you receive from us please see the unsubscribe link we include in each email.

You can also contact us at any time using the details below and let us know exactly what you would like us to change.

10. Managing your information

To reduce the chances of an error or misunderstanding, we need to keep the information we gather about you accurate and up-to-date.

But whilst we work very hard to make sure mistakes don't happen, we need your help, too.

If you have reason to believe any of the information we collect or hold on you may be inaccurate, and you are unable to put it right yourself, please contact us (see below for how to do this).

You are perfectly within your rights to ask us whether we hold information about you and if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a subject access request. Certain exemptions and conditions apply to this right, principally that it should be in writing and that you give us reasonable details about the information you want.

Depending on your country of residence or domicile, you may have additional or different rights to those set out above concerning the information we collect from you and your devices. We will, of course, honour all such legal rights if we are bound by them.

We also reserve the right not to comply with any enquiries or requests we receive about the information we collect, where we may lawfully do so. For example, if we have reason to believe that a request is malicious, technically impossible, involves disproportionate effort or could be harmful to others.

If you have any worries or complaints about the way we use your information, please don't hesitate to get in touch with us. We'll do our very best to set your mind at rest or put things right. And if, for whatever reason, you feel we're not meeting the exceptionally high standards we expect of ourselves, you're within your rights to take your grievance to the UK Information Commissioner's Office (ICO). Please see the section Where to go if you want more information about your privacy rights for further details.

And don't forget that with modern technology, you have more and more personal control over what information we and other organisations collect. For example, you can normally delete cookies and tracking technologies sent to your web browser. You can also change related settings to restrict them going forward, such as by using a private browsing mode (although this may affect your browsing experience on some websites). Plus, you can use the settings options in your mobile devices to restrict what sort of information websites and mobile apps are able to access and use about you. Online advertising networks, social media platforms and search engines (Google etc.) also provide tools to manage the data they collect about you, and how it is used and shared. We urge you to look out for these functions and tools and use them to manage your privacy in a way that suits you best.

11. Updates to this privacy policy

We review the ways we use your information regularly. And in doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

Whenever we change this policy, rest assured we will make every effort to tell you. That way, you can check to see if you're still happy. And if, following any changes, you continue to use our website, e-learning site and mobile apps, contact us by telephone or otherwise provide information to us we will assume that you agree to those changes.

12. About us

Our full legal name is Capital City Training Limited trading as Capital City Training and Consulting.

We're a public limited company incorporated in England and Wales. Our registered company number is 07267280 and our registered address can be found in the contact us section below.

We are the data controller of the information you provide us with. This term is a legal phrase used to describe the person or entity that controls the way information is used and processed.

We are registered with the Information Commissioner's Office in the UK. Our registration number is ZA243636.

13. Where to go if you want more information about your privacy rights

The Information Commissioners Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here http://www.ico.gov.uk/for_the_public.aspx.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

Contact us

You're welcome to get in touch with us to discuss your information at any time.

Our contact details are:
Capital City Training and Consulting
1 Dysart Street
London
EC2A 2BX
Tel: 0203 286 0836
info@capitalcitytraining.com

Thank you very much for taking the time to read this document.