



Skill Pill Privacy policy

Date: updated April 2021

1. Introduction

- 1.1 At Skill Pill we are committed to safeguarding and preserving the privacy of visitors to our website and desktop application and our service users.
- 1.2 This policy explains how we collect and use your personal information when you visit our website, or buy or use our products or services.
- 1.3 In this policy, "Skill Pill", "we", "us" and "our" refer to Skill-Pill M-Learning Limited (company number 06752838) and we're based at Amba House, 2nd Floor Delson Suite, 15 College Road, Harrow, Middlesex HA1 1BA. We are the data controller for the purposes of the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and any other data protection legislation applicable in the UK from time to time.
- 1.4 If you have any questions about your privacy on our website, or our use of your personal data, please contact us on the details set out at the bottom of this page.
- 1.5 Please note that links from our website may take you to external websites which are not covered by this policy. We recommend that you check their privacy policies before submitting any personal information to such sites. We will not be responsible for the content, function or information collection policies of these external websites

2. Data we require to use our Services

- 2.1 You are not required (by law or by any contract with us) to provide personal information to us via our website. We will only require you to provide personal information to us where it is necessary for us to provide you with a service at your request.
- 2.2 When you become a Skill Pill client by signing up to our newsletter or by purchasing our products or services, in order for us to make our services available to you, we generally require minimal data from you. However, this may vary depending on which method you use to access our services.

3. How we use your personal data

- 3.1 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit,

page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking systems including Google Analytics and Lead Forensics. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- 3.2 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interest in the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.3 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is that it is necessary to take steps towards entering into a contract with you OR where our contract is with your business, our legitimate interest in marketing our goods and services.
- 3.4 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). We will use this information only for the purpose you have made this information available to us. The legal basis for this processing is consent. We will only do this where you have informed us that you would like to receive marketing communications and you may update your preferences at any time by contacting us on the details set out at the bottom of this page.
- 3.5 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.6 Our website is not intended for children and we do not knowingly collect data relating to children.

3.7 For our services, we collect information under the direction of our client, that is, an entity that subscribes to the services for use by the entity's personnel. In this respect, we act as a data processor. We will retain and use this personal data as necessary to comply with our legal obligations, resolve disputes and fulfill our obligations under those agreements with the data controllers. In these cases, the data controller will have its own privacy policy that applies to your data, including personal data. We encourage you to read their privacy policies to learn more about their data practices.

4. Disclosure of your information

4.1 We will share your personal data with third parties only in the ways that are described in this privacy policy. We do not sell, trade, rent or disclose your information to others except as provided here-in.

4.2 Where we use third parties to provide and support some of our services, including to host and operate our website and desktop application and deliver our services, we may need to share some of your personal data with those third parties. For example, if you choose to pay by credit card we must release your credit card information to the card-issuing bank to confirm payment. We may also share your personal data with contact management systems to send emails, instant messages, social media messages and SMS messages.

4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data in the following exceptional circumstances where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings.
- Necessary to protect the safety of our employees, our property or the public.
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved.

4.4 Where we act as a data processor for your employer (the data controller), we will retain and use this personal data as necessary to comply with our legal obligations, resolve disputes and fulfill our obligations under those agreements with the data controllers. In these cases, the data controller will have its own



privacy policy that applies to your data, including personal data. We encourage you to read their privacy policies to learn more about their data practices.

5. Retaining and deleting personal data

5.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.2 Except as otherwise mentioned in this privacy policy, we keep your personal data only for as long as required by us:

- To provide you with the services you have requested; and
- To comply with other law, including for the period demanded by our tax authorities.

5.3 Thereafter, and in all other circumstances, we will keep your information for a period of 1 year after the relevant contract ends. If the personal data relates to a prospective client (not a party to a contract) then we will retain such data for as long as we reasonably deem it necessary provided that we consider it within our legitimate interests to do so, balanced against the rights and freedoms of the individual. The duration is kept under regular review.

6. Where we store your data

6.1 We will take reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

6.2 We try to ensure that all information you provide to us is transferred securely via the website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6.3 Our data is held in the UK on servers provided by Rackspace. Information on Rackspace privacy policy can be found here: <https://www.rackspace.com/en-gb/gdpr>.

7. How does the UK's exit from the EU affect your privacy?

The UK has now left the EU and, if you are based in the UK, the EU General Data Protection Regulation (GDPR) no longer applies to our processing of your personal data.



However, the UK has brought the GDPR into national law as the “UK GDPR”, which applies to all of the services that we provide. Under the UK GDPR, you have the same rights as you had under EU law (see section 9 below) and we are required to maintain the same level of protection of your personal data.

8. Amendments

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3 We may notify you of changes to this policy by email or through the private messaging system on our website.
- 8.4 This version was last updated in April 2021 and historic versions can be obtained by contacting us.

9. Your rights

If you require any further information about your rights as explained below, or if you would like to exercise any of your rights, please contact us on the details set out below.

9.1 *You have the right to be informed*

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to comply with this right.

9.2 *You have the right to access your personal data*

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information.
- What categories of information we were using.
- Who we have shared the information with.
- How long we envisage holding your information.

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold. The first copy of your information that you request from us will be provided free of

charge, if you require further copies we may charge an administrative fee to cover our costs.

9.3 *You have the right to correct any inaccurate or incomplete personal data*

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case you can contact us on the details below so that we can correct our records.

9.4 *You have the right to be forgotten*

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for.
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it).
- You object to us using your information and we have no overriding reason to keep using it.
- We have used your information unlawfully.
- We are subject to a legal requirement to delete your information.

In those situations you have the right to have your personal data deleted. If you believe one of these situations applies to you, please contact us on the details below.

9.5 *You have the right to have your data transferred to you or a third party in a common format*

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly use and machine-readable format, please contact us. There is no charge for you exercising this right.

9.6 *You have the right to object to direct marketing*

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us or use the links provided in any of our marketing communications.

9.7 *You have the right to object to us using your information for our own legitimate interests*

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes when we tell you about products or services that are similar to ones you have already bought; when we use your information to help us make our business better; and when we contact you to interact, communicate or to let you know about changes we are making.

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

9.8 *You have the right to restrict how we use your personal data*

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this.
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection.
- We have used your information in an unlawful way, but you do not want us to delete your data.
- We no longer need to use the information, but you need it for a legal claim.

10. Cookies

10.1 Cookies are small text files that are transferred by a website to your browser or the hard drive of your computer if you agree. They help the website identify your browser/device. They perform different tasks on a website, and our Showcase website will not function correctly without them. To find out more about cookies, please visit www.allaboutcookies.org.

10.2 We use both persistent cookies (which expire on a specified date) and session cookies (which expire when you close your browser). The cookies used on our website have been categorized based on definitions given in the ICC UK Cookie Guide. We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

10.3 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

COOKIE	CATEGORY	PURPOSE
SimpleSAMLAuthToken PHPSESSID	Strictly necessary	Used as part of the authentication process that enables users to remain logged in and allows the website to track unique login sessions.
cookieconsent_dismissed	Strictly necessary	Used to remember your cookie preferences.
lfuuid	Analytical/performance cookies	Used to track user behaviour on our website

welcomemessage read_notifications_x mba_difficulty showeditshowcasecontent quiz_percentage	Functionality cookies	Used to ensure the proper functioning of the skill pill library
jv_store_[xxx]	Functionality cookies	Used to operate the Jivochat live chat feature on our website
Lead Forensics	Targeting cookies	Used to track access to our website and services

10.4 We have implemented a programme in order to track usage of our content. We will not share this information with any third parties other than third parties that help us deliver our services unless required to do so by law. We use Lead Forensics and Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

11. Managing cookies

11.1 We understand that not everyone wants to see targeted adverts or contribute to statistics on website use, so we will ask you when you first visit our site which types of cookies you want us to use. You can change your preferences at any time by clicking the cookie banner when you first visit our site. However, please bear in mind that if you don't allow us to use certain cookies, it may prevent you from accessing parts of our site or result in a loss of functionality which degrades your experience of our site.

11.2 In addition to telling us your preferences, you can also configure cookie settings in your web browser. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09> (Edge).

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

12. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you. However, ultimately it is your choice as to whether you wish to use our website or platforms.

13. Review of this privacy policy

We may update this privacy policy from time to time as necessary. The policy that applies to you is the one posted here on our platforms on the day you use our platforms. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact your company representative who in turn can contact their Skill Pill representative.

14. Complaints

If you wish to make a complaint about our collection or use of your personal data, please contact us on the details below in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the ICO website if you wish to lodge a complaint with the ICO.

15. Contact Us

Our contact details are as follows.

Post: Skill-Pill M-Learning Limited
2 Angel Square
London EC1V 1NY



Telephone: +44(0) 870 240 6656

Email: info@skillpill.com

Website: www.skillpill.com