

AULA's DATA PROTECTION AND PRIVACY POLICY

This policy

This is Aula Education Limited's (we/us/our) data protection and privacy policy that explains who we are, why and how we process your personal information (also referred to here as personal data) and [your rights](#) and how to [contact us](#) if you need to.

We are the controller in relation to the personal data processed in accordance with this policy (except where this policy explains otherwise).

This policy together with our [cookies policy](#) sets out:

- Information we collect about you
- Cookies and other technologies
- How we use your information
- Our promotional updates and communications
- Who we give your information to
- Where we store your information
- Payment processing
- How we protect your information
- How long we keep your information
- Your rights
- Changes to this policy
- Contact us

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Information we collect about you

We may process your personal data if:

- You or the company you work for are a customer or a supplier of ours.
- You or the company you work for use our products or services.
- You work for a customer or a supplier of ours, or for someone who uses our products or services.
- You are someone (or you work for someone) to whom we want to advertise or market our services.

Information we collect from you or from a third party

We may process your personal data that we have either obtained from you, or obtained from somewhere else. Personal data which is not collected directly from you may be collected:

- From your employer in connection with your job and how it relates to us.
- If you use any websites or apps operated by us.
- From third parties we work closely with (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, and search information providers). We will notify you when we

receive information about you from them and the purposes for which we intend to use that information.

Personal data relating to you that we process may include:

- Your name.
- Who you work for, and your job function or department.
- Your address, phone number, email address or other contact details (these details may relate to your work or to you personally, depending on the nature of our relationship with you or the company that you work for).
- Information about you that you give us by communicating with us by phone, by e-mail, via our website, via social media or otherwise. It includes information you give us or that we obtain when you use our website, obtain or subscribe to our goods or services, supply us with goods or services, enquire about a product, place an order, enter a competition, promotion or survey, or contact us to report a problem, or do any of these things on behalf of the person that you work for.
- Information relating to transactions with us involving you or the company you work for (for example, details of goods or services that we have supplied to, or obtained from, you or the person you work for).
- Other information relating to you which it is necessary for us to process in order to enter into or perform a contract with you or the company you work for (for example, right to work information and information obtained from credit references agencies where this is necessary to enable us to carry out appropriate checks in relation to contracts with you or someone else that you work for or are otherwise related to).
- Information about events to which you or your colleagues are invited, and your personal information and preferences to the extent that this information is relevant to organising and managing those events (for example, your dietary requirements).
- Information relating to you that you give us or we otherwise obtain when you visit us (for example, if you sign in or are recorded on CCTV while visiting us, or you give us the registration details of your vehicle).

Information that we obtain from you when you use our website and our App may include:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.
- We collect information through our website/App as to your real time location. This information is collected in combination with an identifier associated with your device to enable us to recognise your mobile browser or device when you return to the website/App.

This information may be used in order to understand how our users interact with their physical campus, e.g. to identify students at risk of dropping out.

Delivery of location services will involve reference to one or more of the following: (a) the coordinates (latitude/longitude) of your location; (b) look-up of your country of location by reference to your IP address against public sources; and/or (c) your Identifier for Advertisers (IFA) code for your Apple device, or the Android ID for your Android device, or a similar device identifier. See our [cookie policy](#) for more information on the use of cookies and device identifiers on the site/App.

Cookies and other technologies

Our use of cookies and other similar technologies to process personal data is explained in our [cookie policy](#), which you should please read.

How we use your information

Information you give to us:

We will use this information to:

- Take steps in order to enter into any contract or carry out our obligations arising from any contract entered into between you or the company you work for and us including:
 - conducting credit checks;
 - supplying goods and services to you or the company you work for or receiving them from you or the company you work for, as the case may be;
 - administering your/your company's account with us;
 - verifying and carrying out financial transactions in relation to payments you make in your own capacity or on behalf of your company online/through the App;
 - notifying you about changes to our service.
- Provide you with information about our services we feel may interest you or the company you work for, if you have given your consent to receiving marketing material from us at the point we collected your information, where required by law or otherwise in our legitimate interests provided these interests do not override your right to object to such communications. See '[Our promotional updates and communications](#)'.
- Ensure in our legitimate interests that:
 - content from our site is presented in the most effective manner for you and for your computer;
 - we provide you or the company you work for with the information, products and services you request from us.

Information we collect about you from your use of our site/App

We will use this information in our legitimate interests, where we have considered these are not overridden by your rights:

- To administer our site/App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To keep our site/App safe and secure.
- For measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To improve our site/App to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service, when you choose to do so.

Information we receive from other sources

We may combine this information with information you give to us and information we collect about you in our legitimate interests (where we have considered that these are not overridden by your rights). We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Our promotional updates and communications

Where permitted in our legitimate interest or with your prior consent where required by law, we will use your personal information for marketing analysis and to provide you with promotional update communications by email about our services.

You can object to further marketing at any time by checking and updating your contact details within your account, or selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you, or by sending us an email to rune@aula.education/

You can also request that we send marketing material to a non-personal email address instead of one which identifies you as an individual.

Who we give your information to

We may share your personal data with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal data under this policy. If any of these parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent.
- Appropriate third parties including:
 - our business partners, customers, suppliers and sub-contractors for the performance of any contract we enter into or other dealings we have in the normal course of business with you or the person that you work for;
 - our auditors, legal advisors and other professional advisors or service providers;

- credit reference agencies for the purpose of assessing your credit score where this is in the context of us entering into a contract with you or the person that you work for.
- Payment processing providers who provide secure payment processing services.
- In relation to information obtained via our website:
 - our advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience and subject to the cookie section of this policy;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy.

Other disclosures we may make

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.
- If Aula Education Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply terms and other agreements with you or the company you work for; or to protect the rights, property, or safety of Aula Education Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

Where do we store your information?

The data that we process in relation to you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the EEA who work for us or for one of our suppliers.

We may transfer your personal information outside the EEA:

- In order to store it.

- In order to enable us to provide goods or services to and fulfil our contract with you or the company your work for. This includes order fulfilment, processing of payment details, and the provision of support services.
- Where we are legally required to do so.
- In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy.

How we protect your information

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site/App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 site/App; 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.

Our website may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

How long we keep your information

We retain personal data for as long as you have an account with us in order to meet our contractual obligations to you and for six years after that to identify any issues and resolve any legal proceedings. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

Your rights

You have the right under certain circumstances:

- to be provided with a copy of your personal data held by us;
- to request the rectification or erasure of your personal data held by us;
- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your personal data, including the right to object to marketing [(as mentioned in '[Our promotional updates and communications](#)' section);
- to request that your provided personal data be moved to a third party.

You can also stop all information collection by un-installing the App. You may use the standard un-install processes as may be available for your mobile device.

Your right to withdraw consent:

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by [contacting us](#). You can also change your marketing preferences at any time as described in '[Our promotional updates and communications' section](#)';

How to exercise your rights

You can also exercise the rights listed above at any time by contacting us at rune@aula.education.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html). The [Information Commissioner](#) is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

Changes to this policy

Any changes we make to our privacy policy in future will be posted on our website at <https://aula.education/> and, in relation to substantive changes, will be notified to you by e-mail. This policy was last updated on 1 May 2018.

Contact us

Our full details are:

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