

## Privacy policy

(Updated 17 May 2018)

The characteristics of our business means that, from time to time, we'll require some personal details and information from certain sources about and from our clients, staff as well as customers. We also require some personal details from website users.

The data we collect could just be a name and an email address but depending on your level of engagement with EMPT<sup>®</sup>, it could be much more than that.

The personal information you've shared with us, along with data on how you use our websites - what you search for and what preferences you select, for example - help us to better understand our customers as individuals. This in turn helps us to provide a range of products and services that meet your needs.

### How we protect your data

When you share your personal information with any company, you have a right to expect that information to be treated with total confidentiality.

Your privacy is extremely important to us. We're committed to protecting any personal information you've given us, and we comply with all relevant data protection laws.

This means that:

- We take full responsibility for the information we hold about you
- We will protect your privacy always
- We will never sell your personal information
- Whether you've supplied your personal details online, by phone or text, by email or in a letter, we will never use them without a lawful reason to do so.

- We'll use them for the purposes for which they were initially requested and as fully explained in this Privacy Policy and [Cookie Policy](#).

These policies explain how your personal data is being managed and safeguarded by us, including:

- what information we collect about you
- how we collect and use this information
- how we safeguard the information you've provided
- how to report abuse

EMPT® records how your personal information is used, and we appreciate that you trust us to do that carefully and sensibly.

This Privacy Policy is designed to help you understand how we collect and use your personal information. We want you to make informed decisions when using our websites and any features on them, including any registration and e-commerce services.

This Privacy Policy applies to all the pages on our sites linking to this Privacy Policy and any features of them and any e-commerce, purchasing or other areas which require registration on our sites. However, it won't apply to any third-party sites which are linked to our sites. We recommend that you read the privacy policy of any such sites that you visit as we are not responsible for them.

When we refer to our website or sites, we mean any of our websites or applications from which you have accessed this Privacy Policy.

### **What information does EMPT® collect about me?**

Personal information that we collect may include your name, contact details (phone numbers, email address and addresses), your date of birth, job, course information, your personal interests, credit card or billing information, shopping selections and data about the pages you visit and your other activity on our site, as well as any other personal information relating to you that you supply to us.

Some of our sites may also collect other information that you supply to us, such as information relating to your education, skills or job experience, where relevant in the context of the site or the services provided through the site.

Except where stated otherwise on the site at the time such personal information is submitted, it is only processed for the purposes for which you have submitted it to us.

For staff and learners, we provide references to other sources, related to employment in line with various UK legislation and safeguarding procedures.

### **How does EMPT collect my personal information?**

We collect your information in two ways:

1. Personal information you choose to disclose. You may, for example, provide us with your information when you post something on our site, when you register for any features on our site that require registration, when you contact us (online or offline) or when you order goods or services from us.
2. Information collected by us when you interact with our site, or when you open our email communications. We use cookies (a small piece of computer code that we store for a period on your computer or mobile device) and other similar technologies to collect this information. To find out more, please visit see our [Cookie Policy](#).

In a separate automatic operation, the web server will collect your IP address and browser type and details of the website, application or email communication you came from before entering our site. This information is used to:

- work out how many times our site has been visited
- record which parts of our site have been visited so we can improve the content and layout of the site
- understand the effectiveness of our email communications.

We do not supply this data to third parties.

[What will EMPT® do with my personal information?](#)

### **Email marketing and opt-out**

We and our group companies may use your personal information, for example, to provide you with the relevant service, to process your online purchases, to inform you about products and services offered by us and our group companies, to improve the products and services offered to you, for market

research purposes, for marketing, statistical or analytical purposes to invite you to participate in surveys, discussions and ask for your views on our services via online surveys and discussion forums, to detect, prevent or investigate security breaches or fraud and otherwise to better meet the needs and preferences of our customers.

We will not allow unrelated third parties to use your personal information for marketing without your consent. Where we rely on your consent, you have the right to withdraw it at any time.

We hold personal data including sensitive or special category data about learners and applicants based on the legal requirements related to fair access to assessments. You have rights to make a Subject Access Request [SAR], time for responding to a SAR and rights to rectification. The Information Commissioner's ([ICO](#)) website gives guidance on such rights. Our Data controller is the EMPT® Head of Services. Please contact our Data controller on [info@empton.com](mailto:info@empton.com).

We also use personal information to build marketing profiles, audit how our sites are used, and to help with the strategic development of our sites. When doing so, we remove any direct identifiers.

Participation in surveys and discussion forums is entirely voluntary. You may unsubscribe from being contacted for these purposes at any time. Survey information will be used for market research with the aim of improving our services.

We will show your username on any content you submit or post on our sites (including discussions, bulletin boards and forums).

We will keep your sensitive information securely for up to five years.

### **How does EMPT® keep my personal information safe?**

We seek to protect the safety of all your personal information by implementing appropriate technical and organisational measures. For example, provided your browser accepts Secure Sockets Layer encryption, we seek to protect your payment information against unauthorised access through a secure server.

Where we use third parties to process personal information, we require them to ensure the safety of your information. We use appropriate security measures on our own systems, but the internet is not a secure medium and we cannot guarantee the security of information transmitted via the internet.

Any personal information that you voluntarily post on a public area of our site, such as a bulletin board or discussion forum, or an interactive area requiring registration and/or subscription, may be collected and used by others. Please be careful what personal information you disclose in this way. You understand that we cannot control the actions of other users.

We may update this Privacy Policy from time to time. We will always include the date of a new version so that you know when there has been a change. If you don't agree to the changes, please don't continue to use our site or provide us with your personal information.