

Pro-Study Privacy Policy and GDPR

Introduction

The company is committed to being transparent about how it collects and uses your personal data and to meeting its data protection obligations. This policy sets out the company's commitment to data protection as well as your individual rights and obligations.

- For the purpose of the Data Protection Act 1998 (Act), the data controller is Pro-Study Limited with company registration number **08937635** and ICO registration number **ZA467740**.

Definitions

- **"Personal data"** is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

General Provisions

- This policy applies to all personal data processed by us.
- The Responsible Person shall take responsibility for our ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- We shall continually register with the Information Commissioner's Office as an organisation that processes personal data.

Data Protection Principles

We process personal data in accordance with the following data protection principles:

- Personal data is processed lawfully, fairly and in a transparent manner;
- Personal data is collected only for specified, explicit and legitimate purposes;
- Personal data is processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing;
- Accurate personal data will be kept, and all reasonable steps taken to ensure that inaccurate personal data is rectified or deleted without delay;
- Personal data is kept only for the period necessary for processing;
- Appropriate measures will be adopted to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

Where does Pro-Study Ltd get your personal data from?

We obtain personal data about you from the following sources:

- From you, when you contact us via email, phone or post.
- From you, when you have registered an account with us.

The purposes for which we process your personal data and the legal basis for that processing

- In general terms, we process your personal data for the administration and delivery of your licence key.
- So we can identify you should you contact us with a technical issue regarding your purchase.
- So you can register a secure personal account with us and access online features.

Information we may collect from you

- We may collect and process the following data about you:
- Address, phone number, email address, University/Institution.
- Information that you provide by filling in forms on our site; www.pro-study.co.uk (our site), speaking with our representatives or writing to us. This includes information provided at the time of registering to use our service, providing feedback, signing forms, compliments and complaints, posting material or requesting further services.
- If you contact us, we may keep a record of that correspondence.
- If we contact you, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data.
- Details of services received from us including dates and times of support sessions, persons involved, topics discussed communicated or trained upon, opinions thoughts and actions of our representatives.

Other information we may collect

IP ADDRESSES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site 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.

We may use Google Analytics or similar, which makes use of cookies served by our site.

By using our website you consent to receive the cookies referred to above.

You may 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 site.

Cloud Services

The data you collect using Pro-Study and sync with the cloud will be stored securely in a third-party cloud provider. All information will be accessed, used and stored in accordance with our privacy policy. We will only ever access data stored in the cloud to provide technical support and to maintain our services.

Who might we share your data with?

- Pro-Study Ltd will occasionally need to share your personal data with third parties. For example, it may share some data with third parties involved in the delivery or funding of your disability-related support, such as Student Finance.
- DSA-QAG Auditors.
- Pro-Study re-sellers and Distributors.
- Technical support.
- We won't share your information with anyone for any other reason but for the reason it was collected and processed i.e so business activity can be carried out and services delivered.

Individual rights

As a data subject, you have several rights in relation to your personal data.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

Subject access requests

You have the right to make a subject access request. If you make a subject access request, we will tell you:

- Whether or not your data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from you;
- To whom your data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- For how long your personal data is stored (or how that period is decided);
- Your rights to rectification or erasure of data, or to restrict or object to processing;
- Your right to complain to the Information Commissioner if you think the company has failed to comply with your data protection rights; and
- Whether or not the company carries out automated decision-making and the logic involved in any such decision-making.

We will also provide you with a copy of the personal data undergoing processing. This will normally be in electronic form if you have made a request electronically unless you agree otherwise. If you want additional copies, we may charge a fee, which will be based on the administrative cost of providing the additional copies.

To make a subject access request, you should send the request to Jonathan Webb. In some cases, we may need to ask for proof of identification before the request can be processed. We will inform you if we need to verify your identity and the documents required.

We will normally respond to a request within a one month from the date it is received.

If a subject access request is manifestly unfounded or excessive, we are not obliged to comply with it. Alternatively, we can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request.

If an individual submits a request that is unfounded or excessive, we will notify you that this is the case and whether we will respond to it.

Your rights as a data subject

Your rights under GDPR. You have the right to:

- Withdraw consent where that is the legal basis of our processing;
- Access your personal data that we process;
- Rectify inaccuracies in personal data that we hold about you;
- Be forgotten, that is your details to be removed from systems that we use to process your personal data;
- Restrict the processing in certain ways;
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by us.

Other Rights as a data subject

You have several other rights in relation to your personal data. These may be asking the company to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if your interests override our legitimate grounds for processing data (where we rely on our legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether your interests override our legitimate grounds for processing data.

To take any of these steps, you should send your request to Jonathan Webb.

Your responsibilities

You are responsible for helping the company keep your personal data up to date. You should let us know if your personal data changes, e.g., if you change University, email address etc.

Data security

The company takes the security of personal data seriously. We have internal controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where we engage third parties to process personal data on our behalf, such parties do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Data breaches

If we discover that there has been a breach of personal data that poses a risk to your rights and freedoms we will report it to the Information Commissioner within 72 hours of discovery. We will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to your rights and freedoms we will tell you if there has been a breach and provide you with information about its likely consequences and the mitigation measures it has taken.

International data transfers

The organisation will not transfer personal data to countries outside the EEA.

Security

- We shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.
- We will transfer all data securely.