

## PRIVACY POLICY

Chris Mooney Development Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our Website Terms and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998, the General Data Protection Regulations 2016 and all other legislation, regulations and directives relating to data protection and privacy ("**the Legislation**"), the data controller is Chris Mooney Development Limited, 07810 407374, [chris@cmlearning.co.uk](mailto:chris@cmlearning.co.uk).

## INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

**INFORMATION YOU GIVE US.** This is information about you that you give us by filling in forms on our site [www.cmlearning.co.uk](http://www.cmlearning.co.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product or service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number.

**INFORMATION WE COLLECT ABOUT YOU.** With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, 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 site (including date and time), products or services 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 us.

**INFORMATION WE RECEIVE FROM OTHER SOURCES.** This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

Please note where we request personal information in order to provide goods and services to you and that personal information is necessary for the performance of our contractual obligations to you, we will not be to proceed with the contract if the requested information is not provided.

## 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.

## USES MADE OF THE INFORMATION

We use information held about you in the following ways: **Information you give to us.** We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us, including the provision of information, products and services, as is necessary for the performance of our contract with you;
- to provide you with the information, products and services that you request from us prior to entering into a contract with us but as a step towards such a contract;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about as is in our legitimate interests;
- to permit selected third parties to provide you, with information about goods or services we feel may interest you where you have expressly give your consent for us to do so;
- to notify you about changes to our products or services as is in our legitimate interests for you to do so;
- to ensure that content from our site is presented in the most effective manner for you and for your computer as is in our legitimate interests for you to do so.

## INFORMATION WE COLLECT ABOUT YOU

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research and statistical purposes where it is in our legitimate interests to do so;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer as is in our legitimate interests to do;
- to allow you to participate in interactive features of our service, when you choose to do so as is in our legitimate interests;
- as part of our efforts to keep our site safe and secure in accordance with our legitimate interests;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you in accordance with our legitimate interests;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them in accordance with our legitimate interests.

## INFORMATION WE RECEIVE FROM OTHER SOURCES

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

For the purposes of the above our 'legitimate interests' include promotion of our business, marketing, the maintenance of the goodwill and reputation of Chris Mooney Development Limited, which includes the provision of excellent customer service and care, the proper and effective administration of the site, and to ensure and maintain the security of the data which we process.

## **DISCLOSURE OF YOUR INFORMATION**

You agree that we have the right to share your personal information with selected third parties including:

- [business partners, suppliers and sub-contractors for the performance of any contract we enter into with you where such processing is necessary for the performance of our contract with you;]
- Analytics and search engine providers that assist us in the improvement and optimisation of our site as is in our legitimate interests to do and shall ensure, as far as possible, that all such data is anonymised.
- 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 in accordance with our legitimate interests.
  - If Chris Mooney Development 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 in accordance with our legitimate interests.
  - 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 Website Terms and Conditions, Acceptable Use Policy and other agreements; or to protect the rights, property, or safety of Chris Mooney Development Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction as it is in our legitimate interests to do so.]
  -

## **WHERE WE STORE YOUR PERSONAL DATA**

We may hold your data securely on:

- G-Suite
- Google Drive
- Dropbox

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, 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; 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.

## **RETAINING AND DELETING PERSONAL DATA**

We shall ensure that any 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. We will retain and delete your personal data as follows:

a) personal data provided as part of an order for goods or the provision of our services as part of our contract will be retained for up to 7 years, at the end of which period it will be deleted from our systems;

b) personal data provided other than as part of an order for goods or services shall be retained for 1 year from the date on which it was provided after which time it shall be deleted.

Notwithstanding the above, we may retain your personal data where such retention is necessary for compliance with our legal obligations.

## **YOUR RIGHTS**

You have the right to request any amendments or rectifications to your personal data. You can exercise this right by contacting us at Chris Mooney Development Limited, [chris@cmlearning.co.uk](mailto:chris@cmlearning.co.uk).

You can also use this address to notify us if you would like us to delete or erase your data or, in certain circumstances, if you would like us to restrict the manner in which we process your data. Please note in certain circumstances we may not be able to delete or erase your personal data such as where this is still required for the purpose for which it was provided or where we have overriding legitimate interests in retaining your data.

Where you have given us your consent to the specific processing of your personal data please note you have the right to withdraw that consent at any time. Should you wish to withdraw your consent please contact us at the address above.

Our site may, from time to time, contain links to and from external websites as a service to our visitors. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. The provision of a link on our site to an external website should not be taken as an endorsement by us of that external website, its owners or their products / services

## **ACCESS TO INFORMATION**

The Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Legislation by contacting us at Chris Mooney Development Limited, [chris@cmlearning.co.uk](mailto:chris@cmlearning.co.uk).

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **COMPLAINTS**

If you are unhappy with the way in which we have collected or processed your personal data or have any other complaint in relation to our handling of your personal data, you can make a complaint to the Information Commissioner. Further information can be found on the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk) or via their helpline on 0303 123 1113.

## CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Chris Mooney Development Limited at [chris@cmlearning.co.uk](mailto:chris@cmlearning.co.uk).

Copyright of Chris Mooney, Chris Mooney Development Limited.

[www.cmlearning.co.uk](http://www.cmlearning.co.uk)

[chris@cmlearning.co.uk](mailto:chris@cmlearning.co.uk)

07810 407374