

Xentum Privacy Policy.

We are committed to protecting and respecting your privacy and this policy (together with our terms of use 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 and subsequently the General Data Protection Regulation (the Act), Xentum Limited, Xentum Limited, 5 Bridgewater Court, Lymm, Cheshire, WA13 0ER is the data controller.

Contents

INFORMATION WE MAY COLLECT FROM YOU	2
IP ADDRESSES, COOKIES AND WEB BEACONS	2
WHERE WE STORE YOUR PERSONAL DATA	4
USES MADE OF THE INFORMATION	5
DISCLOSURE OF YOUR INFORMATION	5
MARKETING AND YOUR RIGHTS	5
ACCESS TO, RETENTION AND DELETION OF INFORMATION	6
MAKING A COMPLAINT	6
CHANGES TO OUR PRIVACY POLICY	6
TERMS OF USE	7
CONTACT	7

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Information that you provide to us by filling in forms on our site or that you e-mail to us. This includes information provided when you take a course, subscribe and/or register for any service that we may provide via our site from time to time or when you report a problem with our site.

If you contact us, 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 your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access.

IP ADDRESSES, COOKIES AND WEB BEACONS

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to improve the structure and content of our site and to report aggregate information to any sponsors and our members. This

is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For these reasons we reserve the right to use cookies as an anonymous method of recording your usage of our site and would ask that if you do not wish to have cookies recorded on your machine, you amend the settings on your browser to prevent them from being created. The "Help" section in your browser should provide you with the necessary information to adjust your settings and control the creation and storage of cookies on your hard drive.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies can help a website to arrange content to match your preferred interests more quickly. Most major websites use cookies. Cookies cannot be used by themselves to identify you and we do not use cookies on our website to modify prices or services specific to you. We use them to understand how the website is being used so that we can make improvements.

A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. Two types of cookies are used by us on our site:

- Session Cookies: which are temporary cookies that remain in the cookie file of your browser until you leave the site; and
- Persistent cookies: which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Session Cookies allow you to carry information across pages of our site and avoid having to re-enter information and to allow you to access stored information.

Persistent Cookies help us recognise you as a unique visitor (just a number) when you return to our website and to allow us to assess and understand our content, which pages are being visited and how long visitors spend on each page.

We specifically use Google Analytics for this. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

If you alter your browser settings to refuse our cookies you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Please note that third parties may also use cookies, over which we have no control.

Our website may contain electronic images known as web beacons which allows us to count users who have visited those pages. Web beacons are not used to access your personally identifiable information on our site. They are a technique to compile aggregated statistics about our website's usage. Web beacons collect only a limited set of information including a cookie number, time and date of a page view and a description of the page on which the web beacon resides.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of support and administration services. By submitting your personal data, you agree to this transfer, storing or processing. These agents have access to the personal information required in order to perform their functions but may not use it for any other purpose and we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. 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.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- Where you have consented to be contacted for such purposes, to provide you with information or services that you request from us or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us.
- To promote and allow you to participate in any events or features which may offer on our site from time to time, when you choose to do so.
- To notify you about changes to our service.

We do not disclose information about identifiable individuals to potential sponsors or advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 300 people aged under 30 have clicked on an article on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in L1). 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.

DISCLOSURE OF YOUR INFORMATION

We would only disclose your personal information to third parties:

- If you have given your consent for us to do so for marketing or other specified purposes.
- 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 use and other agreements; or to protect our rights or property and the safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

MARKETING AND 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. You can exercise your right to prevent such processing by refusing your consent at the time of collection or at any other time by contacting us at admin@xentum.co.uk.

Our site may, from time to time, contain links to and from the websites of our members, advertisers and affiliates. 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.

ACCESS TO, RETENTION AND DELETION OF INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act and we have 30 days to respond. You also have the right to ask us to erase, amend or limit the use of the data we hold about you. If there is a legitimate and permissible reason why we cannot do this we will explain why.

We have a retention policy which means we do not keep information we hold about you for longer than necessary unless we there is a legal obligation to do so. We do not hold any 'special category' or high risk information about you at all.

MAKING A COMPLAINT

If for any reason you are not satisfied with our response, you can complain to the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

TERMS OF USE

For our Terms of Use please visit our website.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to admin@xentum.co.uk.