# YEC Privacy Policy

*This Privacy Policy was last updated on 15 November 2023.*

The YEC is committed to protecting and respecting your privacy. We take the privacy of our customers, site users and employees seriously whilst taking great care to protect your personal information. This Privacy Policy covers our data collection practices and describes your rights regarding your personal data.

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use YEC websites, mobile applications, APIs, or related services. It also applies to prospective customers of our business and enterprise products.

By using YEC services, you agree to the terms of this Privacy Policy. You shouldn’t use YEC services if you don’t agree with this Privacy Policy or any other agreement that governs your use of such YEC services.

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## General Information

Our Privacy Policy governs any kind of processing where we are acting as a data controller or co-controller (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons. This policy applies to our processing of data collected through any means, actively as well as passively from persons located anywhere in the world.

Please read the following policy carefully to understand what information we may collect from you, how the information is used and your rights in respect of such use.

We are guided by the following principles when processing data:

* We will only collect data for specific and specified purposes; we will make it clear at the point when we request your information, what we are collecting for and how long we are going to use it.
* We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required.
* We will collect and use your personal information only if we have sensible business reasons for doing so.
* We will not use data for purposes other than that for which the data was collected, except as stated herein, or with prior consent.
* We will seek to verify and/or update data periodically, and we will accept requests for amendments of personal data.
* We will apply high technical standards to make our processing of data secure.
* Except when stated herein, we will not store data in identifiable form longer than is necessary to accomplish its purpose, or as is required by law.

## Data we Collect

We collect certain data from you directly, like information you enter yourself, data about your consumption of content, and data from third-party platforms you connect with YEC. We also collect some data automatically, like information about your device and what parts of our YEC services you interact with or spend time using.

We currently collect and process the following information:

* When you apply to join a course or programme at the school.
* When you contact us for information, via our website, by email, by phone, in person or via social media channels.
* When you work with us in a commercial capacity.
* When you apply to work at YEC, and when you are subsequently employed by YEC.
* If you post on our social media channels or on our website.

### Information collected via our Website

We may use information held about you in the following ways:

* To process a booking for one of our courses or products.
* To facilitate participation in educational content and to issue completion certificates.
* Process payments.
* To manage applications to work for the school such as verifying the identity of instructors.
* To solicit feedback from users and enrolled students.
* To create a profile for you to help us provide a more personalised service which is suited to meet your preferences.
* Market Subscription Plans to prospective customers.
* Identify unique users across devices.
* Tailor advertisements across devices.
* Analyze trends and traffic, track purchases, and track usage data.
* To ensure that content from our site is presented in the most effective manner for you and your computer.
* To facilitate the technical functioning of the website, including troubleshooting and resolving issues and preventing fraud and abuse.
* To send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
* To allow you to participate in interactive features of our service, when you choose to do so.
* To notify you about changes to our service.
* As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public.

### 2.2 How we get the personal information and why we have it

The General Data Protection Regulation (GDPR) establishes 6 legal bases on which we can process your data: these are Consent, Contract, Legal Obligation, Vital Interests, Public Task and Legitimate Interests. For further information about these legal bases and fuller definitions, please refer to the [ICO website](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/).

Most of the personal information we process is provided to us directly by you for one of the following reasons:

| **Category of Personal Data** | **Description** | **Legal Basis for Processing** |
| --- | --- | --- |
| Service Data | For all data collected as part of the process of enquiring about, applying for and booking a course or for any other related service or where you give us feedback about aspects of this provision. | * Performance of contract * Legitimate interests (service provisioning, identity verification, fraud prevention and security, communication). * Legal obligation. |
| Communications and Support | Any processing of customer data not directly related to the fulfilment of a booking or related services, such as signing up for website updates on our website or sending messages to you on behalf of third parties. From time to time, we may use elements of the data you supply to target the messages we send to you. For example, we may use your location to send you information about an event or opportunity happening in your area. | * Legitimate interests (service provisioning). * Consent. |
| Staff Data | For all data collected as part of the process of employing and managing staff. This may include data required for HMRC, pensions, insurance (including staff health insurance cover). As newsletters to our staff are an important part of how we communicate with them. | * Contract. * Legal obligation. * Legitimate interests. |
| Legal | We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. | * Legitimate interests (protection and assertion of our legal rights, your legal rights and the legal rights of others). |

### 2.3 Data We Collect through Automated Means

When you access the website (including browsing content), we collect certain data by automated means, including:

| **Category of Personal Data** | **Description** | **Legal Basis for Processing** |
| --- | --- | --- |
| System Data | Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types. | Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types. |
| Usage Data | Usage statistics about your interactions with the Services, including content accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, referrer, and other data regarding your use of the Services. | Legitimate interests (service provisioning, user experience improvement, product improvement). |
| Approximate Geographic Data | An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address. | Legitimate interests (user experience improvement, fraud prevention and security, compliance) |

## Cookies and Data Collection Tools

We use cookies to collect, store and share data about your activities across websites, including on Your Education Club. They allow us to remember things about your visits to https://www.youreducationclub.com, like your preferred language, and to make the site easier to use. To learn more about cookies, visit https://cookiepedia.co.uk/all-about-cookies. We may also use clear pixels in emails to track deliverability and open rates.

YEC and service providers acting on our behalf (like Google Analytics and third-party advertisers) use server log files and automated data collection tools like cookies, tags, scripts, customised links, device or browser fingerprints, and web beacons (Data Collection Tools) when you access and use the website. These Data Collection Tools automatically track and collect certain System Data and Usage Data when you use our website. In some cases, we tie data gathered through those Data Collection Tools to other data that we collect as described in this Privacy Policy.

### Why We Use Data Collection Tools

YEC uses the following types of Data Collection Tools for the purposes described:

**Strictly Necessary**: These Data Collection Tools enable you to access the site, provide basic functionality, secure the site, and protect against fraudulent activity. These are required for the website to operate properly, so if you disable them, some parts of the site may break or be unavailable.

**Functional**: These Data Collection Tools remember data about your browser and your preferences, provide additional site functionality, customise content to be more relevant to you, and remember settings affecting the appearance and behaviour of the website (like your preferred language).

**Performance**: These Data Collection Tools help measure and improve the website by providing usage and performance data, visit counts, traffic sources, or where an application was downloaded from. These tools can help us test different versions of YEC to see which features or content users prefer.

**Advertising**: These Data Collection Tools are used to deliver relevant ads (on the site and/or other sites) based on things we know about you like your Usage and System Data, and things that the ad service providers know about you based on their tracking data. The ads can be based on your recent activity or activity over time and across other sites and services. To help deliver tailored advertising, we may provide these service providers with a hashed, anonymized version of your email address (in a non-human-readable form).

**Social Media**: These Data Collection Tools enable social media functionality, like sharing content with friends and networks. These cookies may track a user or device across other sites and build a profile of user interests for targeted advertising purposes.

You can set your web browser to alert you about attempts to place cookies on your computer, limit the types of cookies you allow, or refuse cookies altogether. If you do, you may not be able to use some or all features of the website, and your experience may be different or less functional.

## Special Category Data/Criminal Record Data

We may request Criminal Record data from employees. This data has special protection under the GDPR under the specific conditions listed in Article 9 (2) of the GDPR that processing is necessary to assess the working capacity of an employee.

## Who We Share Your Data With

We share certain data about you with instructors, and occasionally we may share your data to analytics and data enrichment providers, your social media providers, companies helping us run promotions and surveys, and advertising companies who help us promote our services. We may also share your data as needed for security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.

We may share your data with third parties under the following circumstances or as otherwise described in this Privacy Policy:

**With Your Instructors**: We share data that we have about you (except your email address) with instructors or teaching assistants for educational content you access or request information about, so they can improve their content for you and other students. This data may include things like your country, browser language, operating system, device settings, the site that brought you to YEC.

**With Service Providers, Contractors, and Agents**: We share your data with third-party companies who perform services on our behalf, like payment processing, fraud and abuse prevention, data analysis, marketing and advertising services (including retargeted advertising), email and hosting services, and customer services and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service.

**With Analytics and Data Enrichment Services**: As part of our use of third-party analytics tools like Google Analytics and data enrichment services, we share certain contact information or de-identified data. De-identified data means data where we’ve removed things like your name and email address and replaced it with a token ID. This allows these providers to provide analytics services or match your data with publicly-available database information (including contact and social information from other sources). We do this to communicate with you in a more effective and customised manner.

**To Power Social Media Features**: Interacting with social media features on the website may allow the third-party social media provider to collect things like your IP address and which page of the website you’re visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the third-party company’s privacy policy.

**To Administer Promotions and Surveys**: We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law (like to provide a winners list or make required filings), or in accordance with the rules of the promotion or survey.

**For Advertising**: If we decide to use an advertising-supported revenue model in the future, we may use and share certain System Data and Usage Data with third-party advertisers and networks to show general demographic and preference information among our users. We may also allow advertisers to collect System Data through Data Collection Tools, to use this data to offer you targeted ad delivery to personalise your user experience (through behavioural advertising) and to undertake web analytics. Advertisers may also share with us the data they collect about you.

**For Security and Legal Compliance**: We may disclose your data (all data categories) to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:

* Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
* Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid request;
* Reasonably necessary to enforce our Terms of Use, Privacy Policy, and other legal agreements;
* Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues;
* Reasonably necessary in our discretion to protect against imminent harm to the rights, property, or safety of YEC, our users, employees, members of the public;
* We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy; or
* Required or permitted by law.

**During a Change in Control**: If YEC undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organisation during such transition or in contemplation of a transition (including during due diligence).

**After Aggregation/De-identification**: We may disclose or use aggregated or de-identified data for any purpose.

**With Your Permission**: With your consent, we may share data to third parties outside the scope of this Privacy Policy.

## Links from our Website

Our website contains links to and from websites operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies and that we do not accept any responsibility or liability for these policies. We advise you to check these policies before you submit any personal data to these websites.

## Security

YEC takes appropriate security measures to protect against unauthorised access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so we cannot guarantee that communications between you and YEC, or any information provided to us in connection with the data we collect through the website will be free from unauthorised access by third parties.

## Your Data Protection Rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, please allow up to 30 days for a response. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify your identity before implementing your request. Please note that we retain certain data where we have a lawful basis to do so, including for mandatory record-keeping and to complete transactions.

We will make it as easy as we can for you to opt out of unwanted processing under Consent, providing it does not restrict our ability to provide you with the primary service you have requested.

We collect data for a wide range of purposes. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or minimised and retained.

Please contact us at support@youreducationclub.com if you wish to make a request.

## Our Policy Concerning Children

We recognise the privacy interests of children and encourage parents and guardians to take an active role in their children’s online activities and interests. Individuals younger than 18 years of age, but of the required age for consent to use online services where they live (for example, 13 in the US or 16 in Ireland), may not enrol on a course, but may have a parent or guardian enrol them on a course and help them access appropriate content. If we learn that we’ve collected personal data from a child under those ages, we will take reasonable steps to delete it.

Parents who believe that YEC may have collected personal data from a child under those ages can submit a request that it be removed to support@youreducationclub.com.

## Users in the European Economic Area and United Kingdom

If you are located in the European Economic Area (EEA) or the United Kingdom (UK), you have the right to request access to your data in a portable format and to request the rectification, erasure, restriction of processing, or objection to processing of your personal data. You also have the right to obtain a free copy of the Standard Contractual Clauses referenced in Section 7.5. You may use the information in Section 6.2 to submit your request. Additionally, if you are located in the EEA, UK, or Switzerland, you also have the right to lodge a complaint with your supervisory authority.

Personal data is also processed outside of the UK, Switzerland, and the EEA by our service providers, including to process transactions, facilitate payments, and provide support services. We use the Controller-to-Processor Standard Contractual Clauses adopted by the European Commission to facilitate transfers of personal data from the EEA to third countries and have entered into data processing agreements with our service providers to restrict and regulate their processing of your data. By submitting your data you consent to this transfer, storage, and processing by YEC and its processors.

## Modifications to This Privacy Policy

From time to time, we may update this Privacy Policy. If we make any material change to it, we will notify you via email, through a notification posted on the website, or as required by applicable law. We will also include a summary of the key changes. Unless stated otherwise, modifications will become effective on the day they are posted.

As permitted by applicable law, if you continue to use any of our services after the effective date of any change, then your access and/or use will be deemed an acceptance of (and agreement to follow and be bound by) the revised Privacy Policy. The revised Privacy Policy supersedes all previous Privacy Policies.

## Questions

If you have any questions, concerns, or disputes regarding our Privacy Policy, please feel free to contact our privacy team at https://www.youreducationclub.com/contact.

## How to Complain

If you have any concerns about our use of your personal information, you can make a complaint to us at support@youreducationclub.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>