

## **Data Protection Policy**

Business School England data protection policy sets out the data processing practices carried out through the use of the Internet and any other electronic communications networks by school.

Please note that all data thus captured will be used and held in accordance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR).

Under the European General Data Protection Regulations 2016, you have rights over your Personal Data in certain circumstances. Those rights may include for example the right to request we amend or delete your Personal Data; the right to withdraw consent; the right to know the purposes for which your Personal Data is being processed and the recipients to whom your Personal Data may be disclosed (subject to legal and regulatory requirements). If you do not agree to your Personal Data being used in accordance with this Notice please do not submit your Personal Data to us through the Platform or any other means.

We collect information from visitors to this website through our application forms, data collection forms and every time you email us. We also collect additional information about your visit to our website; please see above for details of our cookies policy.

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and in line with the requirements of UK data protection legislation. By communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

### **Cookies Information**

The AU website uses 'cookies'. A 'cookie' is a small file of letters and numbers that we put on your computer when you visit our website. These files allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We also use these files to allow you to interact with our website, such as allowing you to use live chat.

Our analytical cookies are anonymous and do not store information about your online usage or link to you as an identifiable individual. We do not link these statistics to any information that you may have provided whilst using the site. We use third-party providers, such as Google Analytics, LiveChatInc and YouTube to provide certain features on our website.

All sites that operate across certain parts of the European Union are required to obtain consent using or storing cookies (or similar technologies) on your computers or mobile device. This cookie policy provides you with clear and comprehensive information about the cookies we use and the purposes for using those cookies.

When the website is used for purely informational purposes, i.e., when you do not register or otherwise share information with us, we only collect the personal data that your browser transmits to our server. If you wish to view our website, we must collect the following data that

are technically required to display our website and to ensure its stability and security (legal basis: Art. 6, para. 1, no. 1 (f) of the GDPR):

IP address

Date and time of the request

Time zone difference with respect to Greenwich Mean Time (GMT)

Content of the request (specific page)

Access status/HTTP status codes

The volume of data transmitted in each case

Website from which the request is sent

Browser

Operating system and its interface

Language and version of the browser software

In addition to the aforementioned data, cookies will be stored on your computer when you use our website. Cookies are small text files that are stored on your hard drive and allocated to the browser used by you and are used to forward certain information to the site that installed the cookie (in this case by us). Cookies cannot execute programs or transmit viruses to your computer. They are used to make the website more user-friendly and effective.

This website uses the following types of cookies, the scope and function of which are explained below:

Transient cookies (see a)

Persistent cookies (see b)

a) Transient cookies are automatically deleted when you close your browser. These particularly include session cookies. Session cookies store what is called a session ID with which the various requests made by your browser are allocated to a collective session. This allows your computer to be recognized again when you return to our website. Session cookies are deleted when you log out or close your browser.

b) Persistent cookies are automatically deleted after a predetermined period of time that may vary between cookies. You can delete the cookies at any time in your browser's security settings.

Your browser settings can be configured according to your wishes. For example, you can reject the acceptance of third-party cookies or all cookies. Please note that if you do this, you may not be able to use all of the functions of this website.

We use:

Google Analytics (anonymised web analysis to improve the website)

LiveChat (customer support chat)

Facebook (remarketing, web analysis)

Google Adwords and Doubleclick (remarketing, web analysis)

Twitter (remarketing, web analysis)

When you visit our website, we notify you of our use of the described third-party cookies. An option for preventing these cookies from being stored on your computer can be found in your browser's settings (legal basis: Art. 6, para. 1 (f) of the GDPR).

If you have consented to the processing of your data, you may withdraw your consent at any time. Such a withdrawal of consent will affect the reliability of the processing of your data after you have sent us the declaration of your withdrawal.

## Google Analytics

To find out more about how Google Analytics gathers and protects data, please see:

<http://www.google.com/analytics/learn/privacy.html>

<https://policies.google.com/privacy?hl=en#infocollect>

To block Google Analytics from using your browsing data, opt out here:

<https://tools.google.com/dlpage/gaoptout>

## Google Adwords and Doubleclick

We use the service of Google Adwords to draw attention to our attractive offers with the help of advertising material (Google Adwords) on external websites. Using the data of such ad campaigns, we can assess how successful the individual advertising measures are. Our objective for this is to display ads that are of interest to you, to make our website more interesting for you, and to attain a fair calculation of advertising costs.

This advertising material is delivered by Google via “ad servers.” In addition, we use ad server cookies, which allow us to measure certain parameters of success, such as the display of ads or clicks by users. If you reach our website via a Google ad, Google Adwords will store a cookie on your PC. These cookies generally expire after 30 days and are not intended to identify you personally. As a rule, the unique cookie ID, the number of ad impressions per ad (frequency), the last impression (relevant for post-view conversions), and opt-out information (indication that the user does not wish to be addressed again) are stored as analytical values for this cookie.

These cookies allow Google to recognize your Internet browser. If a user visits certain pages of an Adwords client’s website and the cookie stored on the user’s computer has not yet expired, Google and the client can recognize that the user clicked on the ad and was forwarded to this page. Each Adwords client is assigned a different cookie. Cookies can therefore not be traced via the websites of Adwords clients. We do not collect and process any personal data using the above-mentioned advertising. Google merely provides us with statistical evaluations. Based on these evaluations, we can recognize which of our implemented advertising measures are particularly effective. We do not receive additional data from the use of advertising material; in particular, we cannot identify users based on this information.

As a result of the marketing tools used, your browser automatically establishes a direct connection with the Google server. We have no influence on the scope and the further use of the data that are collected by Google as a result of using this tool and are therefore providing you with the information at our disposal: the use of AdWords conversion tracking means that Google receives the information that you have visited the corresponding section of our website or have clicked on one of our ads. If you are registered with a service provided by Google, Google can allocate your visit to your account. Even if you are not registered with Google or are not logged into your account, it is possible that the provider will recognize and store your IP address.

Legal basis for the processing of your data: Art. 6, para. 1, no. 1 (f) of the GDPR. Additional information regarding Google’s policies on data privacy can be found here:

<http://www.google.com/intl/de/policies/privacy>  
<https://services.google.com/sitestats/de.html>

and

Alternatively, you can visit the website of the Network Advertising Initiative (NAI) at <http://www.networkadvertising.org>

Google is subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

In addition to Adwords conversion tracking, we use the Google remarketing service. Remarketing is a process we use to remind you of our offers. By using this application, our ads can be displayed to you during your use of the Internet after you have visited our website. This is done by means of cookies that are stored on your browser and that Google uses to record and evaluate your user behavior when visiting various websites. This allows Google to determine when you previously visited our website. According to Google's own statements, Google does not combine the data collected in the context of remarketing with personal data that Google may have stored in relation to you. In particular, according to Google, data are pseudonymized during remarketing.

This website also uses the online marketing tool DoubleClick by Google. DoubleClick uses cookies to display ads that are relevant to the user, to improve reports on the campaign's success, or to avoid repeatedly showing the same ad to a particular user. Google uses a cookie ID to record which ads are displayed in which browser and can thus prevent this ad from being displayed multiple times. Furthermore, with the help of cookie IDs, DoubleClick can record "conversions" that are related to requests concerning ads. This is the case, for instance, when a user sees a DoubleClick ad and later visits the advertiser's website and makes a purchase there using the same browser. According to Google, DoubleClick cookies do not contain personal data.

#### Facebook

In addition, our website uses the "Custom Audiences" remarketing tool of Facebook Inc. ("Facebook"). With this tool, interest-related ads ("Facebook Ads") can be displayed to users of the website when they visit the social network Facebook or other websites that also use this tool. Our objective in using this tool is to display ads that are of interest to you and to thereby make our website more interesting for you.

As a result of the marketing tools used, your browser automatically establishes a direct connection with the Facebook server. We have no influence on the scope and the further use of the data that are collected by Facebook as a result of using this tool and are therefore providing you with the information at our disposal: the use of Facebook Custom Audiences means that Facebook receives the information that you have visited the corresponding page of our website or have clicked on one of our ads. If you are registered with a service provided by Facebook, Facebook can allocate your visit to your account. Even if you are not registered with Facebook or are not logged into your account, it is possible that the provider will recognize and store your IP address as well as other identifying factors.

The "Facebook Custom Audiences" tool can be deactivated at [https://www.facebook.com/settings/?tab=ads#\\_if](https://www.facebook.com/settings/?tab=ads#_if) if you are a registered user.

Legal basis for the processing of your data: Art. 6, para. 1, no. 1 (f) of the GDPR. Additional information on data processing by Facebook can be found at <https://www.facebook.com/about/privacy>

#### LiveChatInc

We use the LiveChat chat platform provided and run by LiveChat, Inc. LiveChat, Inc. participates in and complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. The use of the chat is subject to the legal terms and conditions and privacy policy available on their website:

<https://www.livechatinc.com/privacy-policy>

By using the live chat facility, you agree to data you provide running through the servers used by LiveChat, Inc. Such data will be processed by us in order to deal with your requests and answer your suggestions or complaints, as well as to improve the quality of our website and our services.

#### YouTube

We embed videos from our official YouTube channel. This may set cookies on your computer.

To find out more please visit YouTube's embedding videos information page: <http://support.google.com/youtube/bin/answer.py?hl=en-GB&answer=171780>

Additional information regarding the purpose and scope of the data collection and processing by YouTube can be found in their Privacy Policy, which also includes additional information regarding your rights and setting options to protect your privacy: <https://www.google.de/intl/de/policies/privacy>

Google also processes your personal data in the USA and is subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>

#### Eventbrite

We use Eventbrite, a third-party service provided and run by Eventbrite, Inc., an American company based in San Francisco. The use of Eventbrite is subject to the legal terms and conditions and privacy policy available on their website:

Eventbrite terms and conditions

Eventbrite privacy policy

The information you provide to us to book via Eventbrite will be used to process your booking. We will also use it to contact you via Eventbrite regarding your booking. We may also contact you to undertake post-event evaluation and provide marketing information about courses and events and other products and services offered by the College of Haringey, Enfield and North East London. All marketing communications will incorporate a link enabling you to opt-out of receiving further communications.

## Bookeo

We use Bookeo, a third-party service provided by Bookeo Pty Ltd, to process bookings for free courses. Bookeo ensures that our account data is stored on Bookeo servers located in the EU. Bookeo has Data Protection Agreements in place with each of the sub-processors it uses to process data. The use of Bookeo is subject to the legal terms and conditions and privacy policy available on their website:

[Bookeo privacy policy](#)  
[SurveyMonkey](#)

We use SurveyMonkey, a third-party service provided by SurveyMonkey Inc. and SurveyMonkey Europe UC, to process market research surveys. SurveyMonkey are exploring the possibility of opening a Data Centre in the EU, but currently SurveyMonkey Europe UC has entered into contractual terms to include standard contractual clauses with SurveyMonkey Inc. for the transfer of data to SurveyMonkey Inc. as part of delivery of service. SurveyMonkey Inc. is located in the United States and accordingly, data (to include Respondent data) will be transferred to the United States. SurveyMonkey Inc. participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield. SurveyMonkey is committed to subjecting all personal information and data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. The use of SurveyMonkey is subject to the legal terms and conditions and privacy policy available on their website:

[SurveyMonkey privacy policy](#)  
[Web forms](#)

If you complete and submit a form from this site (such as asking a question or requesting a prospectus), we will use the information you provide to supply or improve our service to you or to respond to your request. Your details will be processed and stored on a computer system for this purpose. All processing will be in accord with the Data Protection Act 1998 and, except for authorised legal investigations, we will not share your details with any other organisations without your permission.

Your data will only be used to deliver the services you have told us you require. Your data may be shared between schools/departments within the college to prove the service to you for which that data was provided but will not be passed to any other parties.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## How to turn cookies off

Internet browsers allow you to change your cookie settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser.