



# Privacy Notice

This privacy notice provides you with details of how we collect and process your personal data through your use of our site(s) [squariclegroup.com](http://squariclegroup.com) [tedlearninggroup.com](http://tedlearninggroup.com) [emerging-u.com](http://emerging-u.com) [tedlearning.co.uk](http://tedlearning.co.uk) [tededucation.co.uk](http://tededucation.co.uk) [ted-digital.com](http://ted-digital.com) including any information you may provide through our site when you purchase a product or service or sign up to our newsletter.

By providing us with your data, you warrant to us that you are over 13 years of age.

Squaricle Group are the data controller, and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Squaricle Group have appointed a Data Protection Officer who oversees privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below.

## Contact Details

Name or title of Data Protection Officer: Roxy Hooton

Email address: [hello@squariclegroup.com](mailto:hello@squariclegroup.com)

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [hello@squariclegroup.com](mailto:hello@squariclegroup.com)

## What data do we collect about you?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, last name, title, address.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Technical Data** may include internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback, and survey responses.
- **Usage Data** may include information about how you use our website, products, and



services.

- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

## How do we collect your personal data?

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
  - order our products or services.
  - attend our training or events
  - create an account on our learning platforms.
  - subscribe to our service or publications.
  - give us feedback.
- **Third parties or publicly available sources:** We may receive personal data about you from various third-party retailers.

Also;

- analytics providers such as Google based outside the EU;

## How do we use your personal data?

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you. You have the right to withdraw consent to marketing at any time by emailing us at [hello@squariclegroup.com](mailto:hello@squariclegroup.com) or clicking unsubscribe when you receive our marketing content.

## Purposes for using your data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at



[hello@squariclegroup.com](mailto:hello@squariclegroup.com) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a user	(a) Identity (b) Contact	Performance of a contract with you
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services</p>
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<p>(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise</p> <p>(b) Necessary to comply with a legal obligation</p>
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy



	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

## Marketing Communications

You will receive marketing communications from us if you have:

- (i) requested information from us or purchased goods or services from us; or
- (ii) if you provided us with your details, and
- (iii) in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by emailing us at [hello@squariclegroup.com](mailto:hello@squariclegroup.com)

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us because of a product/service purchase, warranty registration, product/service experience or other transactions.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new



purpose is compatible with the original purpose, please email us at [hello@squariclegroup.com](mailto:hello@squariclegroup.com)

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **Disclosures of your personal data**

We may have to share your personal data with the parties set out below

- IT and system administration services.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### **International Transfers**

We do not transfer your personal data outside the European Economic Area (**EEA**) when it refers to our administration. The only international transfers we share data on would be orders you have placed from overseas and needs sharing. For example, an in-country courier.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention**



We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

### **Third Party Links**

This website may include links to third-party websites, plug-ins, and applications. Clicking on



those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.