

# Privacy Policy

## Privacy & Data Protection Policy

Projects Beyond Borders Limited (PBB Ltd) (“we”) are committed to protecting and respecting your privacy. The following notice explains what kind of personal data we collect from you, why and how we collect it, what we do with your data and what rights and choices you have when it comes to your personal data. This policy adopts the fundamental principles of the EU’s General Data Protection Regulation (“GDPR”) as the minimum standard to which PBB Ltd, its employees and suppliers must adhere.

### **Purpose and Scope**

The collection and analysis of personal information about individuals (data subjects) is crucial to the delivery of PBB Ltd’s products and services. Maintaining the confidence of individual participants, clients and partners in the responsible processing of this data is of the highest importance to us. Everyone who works for PBB Ltd has some responsibility for ensuring personal data is collected, stored and handled appropriately. It is everyone’s responsibility that personal data is handled and processed in line with this policy and its data protection principles and employees are supported in this through effective training, systems and processes. PBB Ltd also expects its suppliers, associates and partners to comply with the principles as set out below.

All personal data must be dealt with properly, irrespective of how it is collected, recorded and processed. PBB Ltd adheres to the principles relating to the processing of personal data found in the GDPR:

- Lawful, fair and transparent processing – personal data must be processed and collected lawfully, fairly and in a transparent manner in relation to the data subject. The data subjects must be informed of how their data is being handled

- Purpose limitation – personal data must only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Data minimisation – personal data must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed. It must be determined whether and to what extent the processing of personal data is necessary to achieve the purpose for which the processing is undertaken. Where the purpose allows and where the expense involved is in proportion with the goal being pursued, anonymised data must be used instead of personal data.
- Accurate and up-to-date processing – personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard for the purpose for which it is processed, is erased or rectified without delay.
- Limitation of storage in a form that permits identification – personal data must not be retained in a form which permits identification of data subjects for longer than is necessary for the purpose for which the personal data are processed.
- Confidential and secure – personal data must be processed in a manner that ensures appropriate security of the personal data from being revealed, disseminated, accessed or manipulated.
- Accountability and liability – personal data must not be transferred to other countries (outside the EU) that do not offer an adequate level of protection.

### **What Information do we collect**

PBB Ltd collects and processes personal data from a number of sources; this list is not exhaustive:

- When individuals interact with our website, we collect certain information which allows us to analyse website traffic and user behaviour
- When individuals register or sign-up to receive marketing communications and/or PBB Ltd publications, we collect basic contact and profile details
- When individual complete online and offline research exercises, we often collect personal data to help with the analysis of the attitudinal and behaviour information

- When individuals provide content on social media or other digital platforms
- When clients transfer personal data to PBB Ltd (often in the form of qualification information for qualification entry criteria)
- When Students register and/or apply for online learning programmes we collect data to assess entry criteria eligibility, to interact academically with the student and to submit assignment work for assessment and to remit certification as appropriate.
- When employees, suppliers, partners, associates and clients generate personal data as part of their contractual arrangements

PBB Ltd complies with all data protection requirements in both its role as a data controller and data processor. All requirements are also transferred to any third parties used by PBB Ltd to collect, process and store personal data.

PBB Ltd collects, processes and uses personal data under the following legal bases:

- Personal data can be processed following consent by the data subject. Before giving consent, the data subject must be informed in accordance with the transparency principle as set out above. The declaration of consent must be obtained in writing or electronically for the purposes of documentation. In some circumstances, such as telephone communication, consent can be given verbally. In all cases, the granting of consent must be documented. Any consent will only be valid if it constitutes a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of the personal data relating to them
- Personal data can also be processed if it is the legitimate interests of the data controller and that there is no threat to the right and freedoms or the interests of the data subject.

## **How we use your Information**

We use your information in a number of different ways — what we do depends on the information. The tables below set this out some of these in more detail, showing what we do, and why we do it.

## Your name and contact details

<b>How we use your name &amp; contact details</b>	<b>Why</b>
Deliver your course, purchases and certificate to you	We've got to do this to perform our contract with you
Fraud prevention and detection	To prevent and detect fraud against either you or PBB Ltd
Finding out what you, and other customers, like	To ensure we are giving you what you want, and to stay ahead of the competition

## Your payment information

This means card security/CVV codes. We **DO NOT** retain payment information as this service is provided through a third-party payment provider.

<b>How we use your payment information</b>	<b>Why?</b>
Take payment, and give refunds	We've got to do this to perform our contract with you
Fraud prevention and detection	To prevent and detect fraud against either you or PBB Ltd

## Your contact history with us

<b>How we use your contact history</b>	<b>Why</b>
Provide customer and academic service and support	We've got to do this to perform our contract with you.

## Purchase history

How we use your purchase history	Why
Enable you to purchase courses and other products from PPB Ltd	We've got to do this to perform our contract with you
Provide customer service and support, and handle refunds	We've got to do this to perform our contract with you
Finding out what you, and other customers, like	To ensure we are giving you what you want, and to stay ahead of the competition

## Cookies

We use cookies on our website. Cookies are text files containing small amounts of information which are downloaded to your device. They enable our systems to recognise your browser in order that we can provide you with easy use of the various services available on the website. Cookies allow applications to respond to you as an individual. They do not by themselves, tell us your email address or other personal information unless you choose to provide this information. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. For more information on cookies, please see our [cookie notice](#).

## Google Analytics

We may also collect certain non-personally identifiable information when you visit our website site such as the type of browser and operating system you are using, your IP address, your device identifiers, your Internet or wireless service provider, and location-based information, specific web pages, length of time spent, and pages accessed. This information is collected, among other things, to aggregate statistical information, facilitate system administration and improve this site.

## Sharing your information

We do not, and will not, sell any of your personal data to any third party – including your name, address, email address or credit card information. We

want to earn and maintain your trust, and we believe this is absolutely essential in order to do that.

However, we may share your data with the following categories of companies as an essential part of providing our services to you:

- Awarding bodies and contract partners for marking and external verification of qualifications and course work.
- Companies that do things to get your purchases to you, such as payment service providers and delivery companies.
- Professional service providers, such as marketing agencies, advertising partners and website hosts who, who help us run our business
- Law enforcement and fraud prevention agencies, so we can help tackle fraud.

### **Keeping your information**

We will retain your information for as long as we need it, for the purpose we collected it, according to the applicable laws. We'll hold on to your information for as long as you have your Learning account, or as long as is needed to be able to provide the services to you, or (in the case of any contact you may have with our team) for as long as is necessary to provide support-related reporting and trend analysis only.

If reasonably necessary or required to meet legal, regulatory or accreditation requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also keep hold of some of your information as required, even after you have closed your account or it is no longer needed to provide the services to you.

### **Controlling your personal information**

Every data subject has the following rights regarding the use of their data. Any exercise of their rights is to be handled within 30 days by the relevant PBB Ltd employee and should not result in any disadvantage to the data subject.

Where the relevant personal data has been transferred to PBB Ltd by a third party/client, the relevant client contract must be consulted in respect of any process to be followed and the client has to be informed about such request immediately.

Right to information: extensive information including on all rights, contact details, source, retention period, purposes, categories and recipients. Where the relevant information is not included in this policy, data subjects will be provided with this information on a case-by-case basis.

- Right to withdraw consent: it must be as easy to withdraw consent as to give consent
- Right to access data: a right to access data within 30 days and for free
- Right to port data: a right to request personal data be provided in a usable, transferable format to allow data to move between platforms or suppliers
- Right to erasure / “be forgotten”: a right to request data be deleted if the processing of such data has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing has lapsed or ceased to be applicable for other reasons
- Right to object to processing: a right to object to data being processed; the protection of the data subject’s interest takes precedence over the interests of the data controller
- Right to not be evaluated by automated decision-making: this applies where the automated decision has legal or significant effects. PBB Ltd does not envisage that any decisions that will have a legal or other significant effect will be taken using purely automated means
- Right to rectification: right to have records corrected or supplemented
- Right to restrict processing: a right to request that processing be restricted where data cannot be deleted

### How to contact us

If you want to exercise your rights, have a complaint or just have questions, please contact us. Once the request has been submitted, PBB Ltd may contact the you to request further information to authenticate your identity or to help us to respond to the request. Except in rare cases, PBB Ltd will respond within 30 days of receiving this information or, where no such information is required, after we have received full details of the request. It is worth noting, that while some rights apply generally, some are only available in certain circumstances.

Where this is the case, PBB Ltd will inform you along with the reason for the decision.

Projects Beyond Borders Ltd

Permanent House

1 Dundas Street

Huddersfield

HD1 2ES

[info@projectsbeyondborders.com](mailto:info@projectsbeyondborders.com)

## **Our commitment to security**

We are committed to ensuring that your information is secure and 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. We follow accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

No method of transmission over the internet, or method of electronic storage is 100% secure. Therefore, we cannot guarantee the absolute security of your information. The internet by its nature is a public forum, and PBB Ltd encourages you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online. Access to the information which you have provided will be limited to authorised employees, partners and associates as required for the purposes identified above as well as IT security and maintenance.

## **Our responsibility**

Personal data is subject to data secrecy. Any unauthorised collection, processing, or use of such data is prohibited. The “need-to-know” principle applies; PBB Ltd employees, partners, associates, suppliers and clients may have access to personal data only as is appropriate for the type and scope of the task in question. This requires a careful breakdown and separation, as well as limitation, of roles and responsibilities. PBB Ltd employees, partners, associates, suppliers and clients are forbidden to use personal data for their own private or commercial purposes, to disclose them to unauthorised persons, or to make them available in any other way. All Projects Beyond Borders employees, partners, associates and suppliers are made aware of, and trained, in their responsibilities relating to data protection.

PBB Ltd Directors are responsible for data processing; they are required to ensure the legal requirements, and those contained in this policy for data protection are met. The Directors are responsible for ensuring that organisational, people and technical measures are in place so that any data processing is carried out in accordance with these data protection requirements.

PBB Ltd will process all the personal data it holds in accordance with its adopted policies and take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.



## How to complain

Data subjects have the right to lodge a complaint with a data protection regulator in Europe, or within their country in which they work or live, where their legal rights have been infringed or where their personal information has or is being used in a way that they believe does not comply with data protection policy. The contact details for the **Information Commissioner's Office** ("ICO"), the UK's independent regulatory body that upholds information rights, are available on their website, which also contains details on how to make a complaint

## Changes to the PBB Ltd Privacy Policy

This policy is monitored in order to ensure that it remains relevant and may be changed by Projects Beyond Borders. Full review of the policy occurs annually or earlier if required, i.e.. in event of a data breach.

If we make significant changes, we will make that clear on the Projects Beyond Borders Ltd website or other Projects Beyond Borders Ltd services, or by some other means of contact such as email, so that you are aware of the information we collect, how we use it, and under what circumstances we may disclose it. Projects Beyond Borders reserves the right to change this notice at any time.

<b>Approved by:</b>	Y Farrand / A Lawrence	<b>Date:</b> 30 <sup>th</sup> January 2020
<b>Last reviewed on:</b>	30 <sup>th</sup> January 2020	
<b>Next review due by:</b>	1 February 2021	