



## Privacy notice

# Privacy Notice

This is the privacy notice of Intelingo Ltd.

In this document, "we", "our", or "us" refer to Intelingo Ltd.

We are company number 133485C registered in the Isle of Man.

Our registered office is at 25 Heywood Close, Onchan, Isle of Man, IM3 3AF.

## Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## 1. Data Protection Officer

We have appointed a data protection officer (DPO) who is responsible for ensuring that our policy is followed.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO, [DPO's first name and surname] at [info@intelingo.co.uk](mailto:info@intelingo.co.uk).

## 2. Data we process

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Administrators, Teachers/Tutors and Individuals, your identities include information such as your name, surname, username, date of birth, and other identifiers that you may have provided.

Your contact information includes information such as email addresses, telephone numbers and any other information you have given to us for the purpose of using our service.

End users and/or Students' identities only include their username and password. We do not collect or store any personal information that could identify End users and/or Students as individuals.

Financial data includes the receipt of bank transfers and the use of recognised, third party payment facilities. We do not collect or store any financial data such as account numbers and/or personal bank details.

Transaction data includes details about payments or communications to and from you and information about products and services you have purchased from us.

Technical data includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Administrators, Teachers/Tutors and Individuals, your profiles include information such as usernames and passwords, purchases or orders made by you, feedback and survey responses.

End users and/or Students, your profiles only include your usernames, date of birth, gender and passwords.

Marketing data includes your communication preferences; responses and actions in relation to your use of our services.

We may aggregate anonymous data such as statistics, first language, age, year group, gender and demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

We may, for example, aggregate profile data for marketing purposes.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy notice.

We do not collect any special personal information about you.

### **3. If you do not provide personal information**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

## **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **4. Information we process because we have a contractual obligation with you**

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **5. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business and our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [info@intelingo.co.uk](mailto:info@intelingo.co.uk). However, if you do so, you may not be able to use our website or our services further.

## **6. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our organisation.
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage our organisations' risk
- protecting your interests where we believe we have a duty to do so

## **7. Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## **Specific uses of information you provide to us**

### **8. Complaints regarding content on our website**

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

### **9. Information relating to your method of payment**

Payment information is never taken by us or transferred to us either through our website or otherwise.

Third party payment service provider page may be branded to look like a page on our website, but it is not controlled by us.

### **10. Information about your direct debit**

When you agree to set up a direct debit arrangement, the information you give to us is passed to our own bank for processing according to our instructions. We do not keep a copy.

## **11. Job application and employment**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

## **12. Communicating with us**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our organisation.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## **13. Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed on to our website.

## 14. Cookies

Cookies are used for a variety of things that help improve your online experience. Some ways we make our online service easier to use include using cookies that:

- Make login faster by remembering your customer details
- Make the page load quickly by sharing the workload across computers
- Give you access to self-help information and our live chat
- Ensure our pages are optimised for your browser or device by giving us technical information about the device or browser you are using

### Personal Preferences

Cookies can help give you content that matches your preferences. We might give you relevant offers because we know what other offers you liked. They also allow you to customise a page.

You may block cookies by activating the setting on your browser or device that allows you to refuse the setting of all or some cookies. However, if you use your browser or device settings to block all cookies you may experience reduced functionality on our Services.

## **Safety and Security**

Some cookies help make sure your information is secure when using our services while keeping our forms and shopping site easy to use.

## **Improving our service**

We also use cookies to measure and analyse how visitors use the site. This helps us develop it and make it easier to use.

## **Third-party Cookies**

Intelingo works with a number of companies and websites that help make sure our adverts, promotions and marketing messages are displayed to people who might be interested. These companies and partners may use cookies to collect anonymous data such as how many people have viewed a particular page each day.

## **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses 'cookies', which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## **Disclosure and sharing of your information**

### **15. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

### **16. Third party advertising on our website**

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

### **17. Credit reference**

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

## **Control over your own information**

### **18. Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

## **19. Access to your personal information**

At any time, you may review or update personally identifiable information that we hold about you, by signing into your account on our website.

To obtain a copy of any information that is not provided on our website you should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

## **20. Removal of your information**

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

## **21. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Other matters**

## **22. Use of site by children**

We do not sell or market products to children under the age of 18.

Although children will use our service, no personal information will be collected or stored by our organisation. Refer to paragraph 2 of this document.

## 23. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## 24. How you can complain

If you are not happy with our privacy policy or if you have any complaints, please tell us.

If a dispute is not settled, we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

## 25. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

## **26. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **27. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at [info@intelingo.co.uk](mailto:info@intelingo.co.uk).