

# Privacy Notice

**Here, you can find out how we safeguard your information and how we use it to improve our products and services for the benefit of all our customers and website users.**

*Updated January 22, 2024*

The nature of our business means that, from time to time, we'll require some personal details from our customers and website users.

The data we collect could just be a name and an email address, but depending on your level of engagement with Boundless Learning, it could be much more than that.

The personal information you've shared with us, along with data on how you use our websites – what you search for and what preferences you select, for example – help us to better understand our customers as a group and as individuals. This in turn helps us to provide a range of products and services that meet your needs.

## How we protect your data

Your privacy is extremely important to us. We're committed to protecting your personal information, and we comply with all relevant data protection laws.

Whether you've supplied your personal details online, by phone or text, by email or in a letter, we will never use them without a lawful reason to do so. We'll use them for the purposes for which they were initially requested and as fully explained in this Privacy Notice and [Cookie Policy](#).

If you use our site as part of an entity or organisation that has an agreement with Boundless Learning (such as your employer), the terms of that organisation's contract for your use of our site may restrict our collection or use of your personal information further to what is described in this Privacy Notice.

This Privacy Notice is designed to help you understand how we and other companies in our group collect and use your personal information. We want you to make informed decisions when using our websites and any features on them, including any registration and ecommerce services.

This Privacy Notice applies to all the pages on our sites linking to this Privacy Notice and any features of them and any ecommerce, purchasing or other areas which require registration on our sites. However, it won't apply to any third-party sites which are linked to our sites. We recommend that you read the privacy notice of any such sites that you visit as we are not responsible for them.

When we refer to our website or sites, we mean any of our websites or applications from which you have accessed this Privacy Notice.

We have included full details of who we and our group companies are at the end of this Privacy Notice.

## What information does Boundless Learning collect about me?

**Information you provide to us.** We collect personal information that you provide to us, or that someone on your behalf (such as your employer) provides to us, which may include your name, contact details (phone numbers, email address and addresses), your date of birth, job, course information, your personal interests, credit card or billing information, and shopping selections. You may, for example, provide us with your information when you post something on our site, when you register for any features on our site that require registration, when you contact us (online or offline) or when you order goods or services from us.

Some of our sites may also collect other information that you supply to us, such as information relating to your education, skills or job experience, where relevant in the context of the site or the services provided through the site. Except where stated otherwise on the site at the time such personal information is submitted, it is only processed for the purposes for which you have submitted it to us.

**Information we collect automatically.** When you use or access our site or access email communications from us, we may also collect certain information through automated means, including data about the pages you visit and your other activity on our site. This may include:

- **Device data**, such as your mobile phone number, unique device ID, device type, machine ID, geolocation information, computer and connection information, browser type, Internet Protocol (IP) address (a number that is automatically assigned to your computer or device when you use the Internet, which may vary from session to session), domain name, and date and time stamps for your visits. We also may collect any telephone number from which you contact us.
- **Log data**, including information associated with your activities on our site, including information about the way you interact with our site, statistics regarding your page views and traffic to and from our site, hyperlinks clicked, and other actions you take. We may also track information such as the URL that you visited before you come to our site and the URL to which you next go.

We use this information to monitor how many times our site has been visited, record which parts of our site have been visited so we can improve the content and layout of the site, and understand the effectiveness of our email communications. We may from time to time supply this data to third parties in an anonymised form for uses in connection with our site.

**Cookies and similar tracking technologies.** As with most websites and other digital platforms, we use cookies, pixel tags, web beacons, and similar technologies to collect and store certain information about visitors to our site. We use this information to improve our site, and to help us remember you and your preferences when you next visit our site. For more information about our practices in this area, please see our [Cookie Policy](#).

## What will Boundless Learning do with my personal information?

We and our group companies use your personal information for a variety of business purposes which are in our legitimate interests ("**Business Purposes**"), in order to enter into or perform a contract with you ("**Contractual**"), with your consent where required by applicable law ("**Consent**"), and/or compliance with our legal obligations ("**Legal Reasons**"). For example, we may use your personal information:

- to provide you with the relevant services through our applicable site, for Contractual Reasons;
- to process your online purchases, for Contractual Reasons;
- to inform you about and provide more information on products and services offered by us and our group companies, for our Business Purposes or with your Consent;
- to manage use of our site, respond to enquiries and comments and provide customer service and support, for Contractual Reasons;
- to send technical alerts, updates, security notifications, and administrative communications for our Business Purposes;
- to invite you to participate in surveys, discussions and prize draws and ask for your views on our services via online surveys and discussion forums, for our Business Purposes and/or with your Consent;
- to improve the products and services offered to you for our Business Purposes;
- for marketing for our Business Purposes and/or with your Consent;
- for statistical or analytical purposes for our Business Purposes;
- for internal administrative and technical operations to keep our site, network and information systems updated, patched and secure for our Business Purposes;
- to detect, prevent or investigate security breaches, fraud or other illegal activities for our Business Purposes and/or Legal Reasons;
- to (i) comply with legal obligations, (ii) respond to requests from competent authorities, (iii) protect our interests, (iv) protect our rights, safety or property, and/or that of our partners, you or others, and (v) enforce or defend our legal rights, for our Business Purposes and/or Legal Reasons; and
- to otherwise to better meet the needs and preferences of our customers for our Business Purposes.

We will not allow unrelated third parties to use your personal information for marketing without your consent. Where we rely on your consent, you have the right to withdraw it at any time.

We also use personal information to identify types of users, audit how our sites are used, and to help with the strategic development of our sites. When doing so, we remove any direct identifiers.

Participation in surveys and discussion forums is entirely voluntary. You may unsubscribe from being contacted for these purposes at any time. Survey information will be used for market research with the aim of improving our services.

We will show your username on any content you submit or post on our sites (including discussions, bulletin boards and forums).

## **For how long will Boundless Learning keep my personal information?**

We will keep your personal information only for as long as necessary to fulfil the purposes for which we are processing your personal information unless the law permits or requires longer. For example, we might need to keep your personal data for quality assurance of the service we have provided, or we might need to keep it to defend future legal claims.

## **Email marketing and opt-out**

We will not send you marketing emails if you have opted out of receiving them. Any marketing emails we send you will include an unsubscribe link at the end of the email.

Some Boundless Learning sites also provide contact details you may use if you want to contact us by email, post or telephone in order to unsubscribe. In addition, some Boundless Learning sites have a "My Account" page where you can choose whether or not to receive marketing communications from us.

## **How does Boundless Learning keep my personal information safe?**

We seek to protect the safety of all your personal information by implementing appropriate technical and organisational measures. For example, provided your browser accepts HTTPS (Hyper Text Transfer Protocol Secure) encryption, we seek to protect your payment information against unauthorised access through a secure server. Where we use third parties to process personal information, we require them to ensure the safety of your information.

Any personal information that you voluntarily post on a public area of our site, such as a bulletin board or discussion forum, or an interactive area requiring registration and/or subscription, may be collected and used by others. Please be careful what personal information you disclose in this way. You understand that we cannot control the actions of other users.

## **Will Boundless Learning share my personal information with anyone else?**

We will never sell your personal information. We may disclose and share your personal information:

- with our group companies;
- academic institutions and others we partner with to provide services on our sites;
- your employer, or other organisation that may be providing you with access to our sites or services;
- our service providers (including, for example, credit reference agencies and payment processors, distributors/agents of our products, suppliers who develop or host our sites);
- third-party search engines that may index user profile pages and usernames as part of the URL of the user profile page by default if required or permitted by law;
- relevant third parties (such as your employer, your school, your internet service provider, law enforcement agencies) if we reasonably believe you may be in breach of the law (for example, if you have posted defamatory content on our sites) or if required to do so in accordance with applicable law;
- our professional advisors, such as our auditors, accountants and lawyers;
- a successor organisation or other legal entity, in the case of a merger, financing, acquisition or dissolution, transition, or proceeding involving the sale, transfer, divestiture, or disclosure of all or a portion of our business or assets; and
- other third parties with your consent.

## **Will Boundless Learning send my personal information to another country?**

We may transfer your personal information to other countries around the world, including countries outside of the United Kingdom ("UK") and the European Economic Area ("EEA"), which may not have the same data protection laws as those of the country where you access our sites. Where we transfer your personal information to countries outside of the UK or EEA we will take appropriate steps to ensure your personal information is afforded the same level of protection as described in this Privacy Notice.

We have entered into an intercompany data processing agreement using the European Commission standard contractual clauses and either the UK transfer addendum to the standard contractual clauses or the international data transfer agreement template provided by the UK Information Commissioner's Office (in the absence of an adequacy decision) for data transfers to our group companies located outside of the UK or the EEA. We rely on adequacy decisions or any adequate data transfer mechanisms adopted by the European Commission, UK Government, or a supervisory authority from time to time for transfers to third parties located in countries outside of the UK or the EEA.

## **What rights do I have?**

In some regions, such as the UK and EEA, you may have certain rights in relation to your personal information in certain circumstances, including the right to:

- request access to and obtain a copy of your personal information;
- rectification of your personal information if it is no longer accurate or erasure of your personal information if our retention is no longer necessary for the purposes for which it was collected;
- restrict or object to the processing of your personal information in certain circumstances; or
- data portability (if applicable).

If you wish to exercise any of your rights in relation to your personal information, please send your request to us using the details set out in the "Contacting Boundless Learning" section below. We will consider and act upon any request in accordance with applicable data protection laws.

You may also have the right to complain to the Information Commissioner (if you are in the UK) or to your local data protection supervisory authority if you are unhappy with our privacy practices, including as notified under this Privacy Notice.

## **What if I am under 16 years old?**

If you are under 16 years of age, please be sure to read this Privacy Notice with your parent or guardian and ask them questions about anything you don't understand.

## **Misuse of personal information**

Any improper collection or misuse of personal information is in violation of this Privacy Notice and of our Legal Notice or terms of use. If you have any concerns that your personal information has been used in violation of this Privacy Notice, please report it by emailing [dataprivacy@Boundlesslearning.com](mailto:dataprivacy@Boundlesslearning.com).

You agree not to misuse any personal information available on our sites or to gather it or use robots or other automated scripts, codes or functionalities to do so.

We may immediately suspend or terminate your access to our site without notice if we become aware that you are in breach of applicable terms and conditions of use or of this Privacy Notice.

## **Changes to this Privacy Notice**

We may update this Privacy Notice from time to time. We will always include the date of a new version so that you know when there has been a change.

## **Contacting Boundless Learning**

If you have any questions about our Privacy Notice, or the manner in which Boundless Learning collects, uses or otherwise processes your personal information, including the transfer or onward

transfer of your personal information outside your jurisdiction of residence, please do not hesitate to contact us at [dataprivacy@Boundlesslearning.com](mailto:dataprivacy@Boundlesslearning.com).

This Privacy Notice is provided on behalf of Embanet UK Limited (with a registered address at C/O Gateley, 111 Edmund Street, Birmingham, England, B3 2HJ), trading as Boundless Learning, and its group companies.

For the purposes of the UK/EU General Data Protection Regulation and other applicable laws globally, Embanet UK Limited, trading as Boundless Learning, is responsible for your personal information and is the "data controller."