

This privacy notice sets out how we will process personal data we collect from or about you, or which you provide to us. Please read this notice carefully to understand why data is being collected and what we do with that data.

Our website and services may contain links to independent websites which are not provided by us. Such independent sites are not under our control, and we are not responsible for and have not checked and approved their content or their privacy policies.

We may change the privacy notice from time to time by amending this page. For the purpose of the Data Protection Act 1998 and General Data Protection Regulation EU 2016/679, the data controller is Edge Gain Ltd a company registered in England under company number 08064563, whose registered address is Wimborne House, 6 Pump Lane, Hayes, Middlesex, UB3 3NB.

### **What type of information will we collect from you?**

The personal information we collect from you will typically include the following:

- Any personal details you knowingly provide us with through email, phone, surveys, forms or other direct contact from you.

### **On what basis can we process your information?**

The legal grounds under data protection legislation for processing your personal data are as follows:

- CONTRACTUAL – processing is necessary for the performance of a contract; and / or
- LEGAL – processing is necessary for compliance with a legal obligation; and / or
- LEGITIMATE INTEREST – Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

### **How and why is your information used?**

We may use your information for a number of different purposes, which may include:

- providing you with the services, products or information you asked for.
- processing orders that you have submitted;
- carrying out our obligations under any contracts entered into between you and us;
- keeping a record of your relationship with us;
- conducting analysis and market research so we can understand how we can improve our services, products or information;
- dealing with entries into a competition;
- seeking your views or comments on the services we provide;
- notifying you of changes to our services;
- sending you communications which you have requested and that may be of interest to you. These may include information about new courses and offers of goods and services; and
- processing grant or job applications.

### **How long is your information kept for?**

We keep your information for no longer than is necessary for the purposes it was collected for, the length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and tax/accounting purposes).

We review our retention periods on a regular basis.

### **Who has access to your information?**

- We do not sell or rent your information to third parties.
- We do not share your information with third parties for marketing purposes.

However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy. These third parties may include:

Third parties working on our behalf: We may pass your information to our third party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to award digital badges on completion of courses). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to

use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

**Third Party Product Providers we work with:** our trusted third party product providers provide a range of quality and reliable products and services (e.g. Credly for digital badging). They will be acting as a joint controller of your information and therefore we advise you to read their Privacy Policy. These third party product providers will share your information with us which we will use in accordance with this policy.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our staff, customers, users of the website or others. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## **Your Rights**

### **How you can access and update your information**

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed. These requests are free of charge and can be sent to Greg Hodgson – Edge Gain Ltd Conifers, Rosebarn Ln, Wilstone, Tring HP23 4PZ

### **How you can request erasure of your data**

You can ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where you have withdrawn consent for us to process it (as explained below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **How you can withdraw your consent**

You have the right at any time to withdraw any consent you have given us to process your personal data. Please note if you withdraw your consent it will not affect the lawfulness of any processing of your personal data we have carried out before you withdrew your consent. Should you wish to do so you can change your consent preferences at any time by contacting us at [info@edgegainltd.com](mailto:info@edgegainltd.com)

### **How you can restrict or object to us using your data**

You can ask us to suspend the way in which we are using your information in certain scenarios, or object to our processing your data where we are relying on a legitimate interest ground (or those of a third party) and you feel it impacts on your fundamental rights and freedoms,

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services. Depending on the extent of your request we may be unable to continue providing you with our service. Any queries or concerns about the way in which your data is being used can be sent to Greg Hodgson– [greg@edgegainltd.com](mailto:greg@edgegainltd.com)

### **Moving your information to another organisation**

In the event that we process your data by automated means where you have either provided us with consent for us to use your information or where we used the information to perform a contract with you, you have the right to request that we send to you or to another organisation, a copy of the personal data we hold about you, for example when you are dealing with a different service provider. If you would like us to move, copy, or transfer your information please let us know by email to [info@edgegainltd.com](mailto:info@edgegainltd.com) We will respond to you within one month after assessing whether this is possible, taking into account the technical compatibility with the other organisation in question.

### **Transferring your information outside of Europe**

As part of the services offered to you, the information which you provide to us may be transferred to countries outside the European Economic Area ("EEA"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. You should be aware that these countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EEA in this way, we will take steps to ensure that

appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services. We undertake regular reviews of who has access to information that we hold to ensure that your info is only accessible by appropriately trained staff, volunteers and contractors.

### **Complaints about the use of your personal data**

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated by writing to Greg Hodgson at Edge Gain Ltd Conifers, Rosebarn Ln, Wilstone, Tring HP23 4PZ

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at [www.ico.org.uk](http://www.ico.org.uk) or 0303 123 1113.