

Cookies, GDPR and Privacy

Our use of cookies

We use necessary cookies to make our site work. We do not set optional (or otherwise) analytics cookies to help us improve it – we believe that even this gives large corporations too much information. We won't set any form of cookies other than necessary ones at all – we simply don't use them.

We Use Necessary Cookies Only

Necessary cookies enable core functionality such as security, network management, and accessibility. You may disable these by changing your browser settings, but this will affect how the website functions. The cookies we use are all 'Session Cookies' They originate from our server, and they are NOT stored on your machine. A session cookie is always set by us to be deleted once the session has been finished (your browser window has been closed). We therefore use no kind of persistent, analytical, third party or tracking cookies at all. We even self-host your web fonts, to prevent downloading them from Google – which would have required cookies.

The primary use of our session cookie is when you log in to do a survey or to book a course, and it's used to transfer information from one web page to another (the login page to the main survey page etc.)

When you close your browser, the session cookie is deleted. And it never sits on your computer, only on our server.

We do not embed videos as we have watched Google depositing cookies on browsers simply used for this purpose. Similarly, we do not use 'Google analytics'.

Promoting Excellence



WN6 8BJ

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www.promotingexcelle nce.co.uk

Analytical, Tracking, Third Party Cookies

We do not use them. At all. Your privacy really does matter to us.



Promoting Excellence Data Protection and Privacy Policy

We are Promoting Excellence Limited and ASDTi Limited ("PromEx/we/us"). We are very serious about protecting your privacy. Your trust is our most important asset. This privacy policy explains how Promoting Excellence may collect information from you via our websites and how that information may be used subsequently. If you have any queries in relation to this privacy policy, please contact us. ASDTi is listed because they host our UK web servers, and are located in Glossop, Derbyshire. By browsing and using our website, you agree to this policy governing your use of the website. If you do not accept this policy, you must not use our website.

This policy applies only to websites created by PromEx. It does not apply to websites owned or hosted outside of the Promoting Excellence Group, to which we may provide links (for example – but not limited to - OfSTED, or the DfES). These 'external' websites are not subject to our privacy policy. You are advised to read the privacy policy of such external websites.

We may change our privacy policy from time to time without notification, so you should regularly review this policy when you visit any of our sites.

1. Collection of information when browsing

In order to provide the services you want, and to allow you to experience a more personalised service when you revisit us, (for example to show you our cookie and privacy policy when you first visit, but not every single time when you re-visit us within a short period), we use cookies - but only those necessary for the functioning of our site. We do not use any other form of cookie-based information-gathering or tracking when you simply browse our sites. Remember that external sites, to which we might link (such as OfSTED will have their own policies in this regard which you should read on their sites.

2. Collection of personal information

We will only collect personal information from you (such as your name, address, telephone number, email address, school name etc.) which you have provided voluntarily to us by booking a PromEx training course, attending as a delegate a PromEx training course, completing a PromEx 360-degree feedback survey, completing PromEx contact forms, by telephoning us, or by sending emails to us (for example, to request us to include you on a class we are running). Please do not submit your personal data to us if you do not wish us to collect it.



3. Use of your information

You agree that we may obtain, hold, correlate, merge and use your information (including personal information gathered as above) for the purpose of providing you with our products and services now and in the future. These include:

- (a) Personalising your visits to our site and developing the design and style of the site to improve our services to you
- (b) (Where you have requested attendance on our classes or training courses) To inform you about the latest classes and courses we are running (we NEVER share your details with other companies outside of the PromEx group and ASDTi Ltd of Glossop, UK, who host our servers) that you might also find interesting, and to inform the trainer and venue about the numbers attending (including where needed dietary requirements or disability adaptations that are needed so they can make them for you.
- (c) (Where you have purchased 360° products) To remind you of deadlines, supply you with passwords and assistance and ultimately to provide your report. To inform you of new products in which you might be interested. To advise you of developments in education that might help you as
- (d) Communication (including our own marketing and personalising such communication) with you from PromEx.
- (e) Compiling customer reviews
- (f) For PromEx's own internal market research purposes
- (g) To prevent the posting of illegal, offensive, or objectionable comments on our sites or into our reports
- (h) For PromEx's internal strategic development
- (i) For any purpose required by law or regulation
- (j) For PromEx's accounting purposes

4. Sharing information

With only the exceptions listed above, and below in this section and the cookie information above, your information is not shared with anyone. The only exceptions to this are those listed below

- 1. We reserve the right to access and to disclose personal information to comply with applicable laws and lawful government requests or requests by applicable regulatory bodies to operate our systems properly or to protect either ourselves or our other users.
- 2. We may not transfer, sell, or assign any of the information described in this policy to third parties except as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganisation of Promoting Excellence Ltd.
- 3. We use securely encrypted backup services provided by Carbonite of 2, Avenue de Lafayette, Boston MA 02111, USA. All data is strongly (256 bit or better) encrypted here in the UK before being backed-up and transferred to the USA for the sole purpose of secure backup storage. You



- consent to the transfer of your fully encrypted personal information outside of the European Economic Area solely and only for these backup purposes.
- 4. We share all information with ASDTi Ltd of Bridge House, Market Street, Glossop, Derbyshire, UK who host our webservers. Their Privacy and GDPR policies are already reflected within this document. ASDTi can be contacted at mio@asdti.com

5. Monitoring e-mails

We may monitor and keep records of e-mail communications which you send to us and other communications with you in accordance with this policy and our other business interests

6. Safeguards and security

No data transmission over the internet can be entirely secure, and therefore we cannot guarantee the security of your personal information and/or use of our sites. However, we use our reasonable endeavours to protect the security of your personal information from unauthorised access or use by others. PromEx's websites all use Secure Sockets Layer 2048bit encryption, verified through Sectigo (formerly Comodo Ltd) of 1255 Broad Street, Clifton, NJ 07013, USA. In addition to our safeguards, your personal information is protected in the UK by the Data Protection Act. This provides that the information which we hold about you should be processed fairly and lawfully and should be accurate, relevant, and not excessive. The information should, where necessary, be kept up to date and not be retained for longer than is necessary. Please help us to keep your personal information accurate by updating your details if they change - just contact

For more information on the Data Protection Act and the Information Commissioner please see https://ico.org.uk/

7. To change any of the information we hold about you

Should your personal information change (e.g. your postcode, your role, or the vacancies in which you are interested), or if you wish to review or receive copies of the personal information we hold about you, or have any other queries please contact us with full details of your request. We may charge a small administration fee in relation to fulfilling a request for access to personal information. We will e-mail you using your contact details to confirm we have actioned your request.

8. To delete some or all of the information we hold about you

Should you no longer wish to receive any contact or services you have signed up for from us, or to delete all the information we hold about you, please contact us with full details of your



request. We will e-mail you using your contact details, either to confirm we have actioned your request or to advise that we do not hold any information about you.



