



STRATEGIC 7 LTD PRIVACY POLICY & GDPR

Strategic 7 Ltd are committed to protecting and respecting your privacy.

This policy (together with our [terms of use](#) and any other documents referred to on it) sets out how Strategic 7 Ltd uses and protects your personal information, including data from your use of our website.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our website you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Directive (EU) 2016/679 (the "**Regulation**"), the data controller is Strategic 7 Ltd (company number SC425267).

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our website, subscribe to our services, or when using our products and services and when you report a problem with our website. The information you give us may include your name, address, e-mail address and phone number, geographical location.
- **Information we collect about you.** With regard to each of your visits to our website and whilst using our products and services we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products you viewed or searched for; technical and use information regarding your activity and utilisation of any of our products and services; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services and systems we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, risk management providers, data providers, technology providers, search information providers, credit reference agencies) and may receive information about you from them.
- **COOKIES.** Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the Cookies we use and the purposes for which we use them see our [Cookie policy](#).
- **Google analytics.** We use Google Analytics to track your user interaction when you visit our website. We use the data retrieved from Google Analytics to better understand how our website visitors use our web page and to understand the number of people using our website and how they found it. Google analytics captures the following types of data about you while you are on our website:
 - The title of the page you are viewing and its URL
 - Your interactions with the site including time of visit, pages visited and the time you spent on each page you visited
 - Links to videos and other websites you have clicked on
 - Your location derived from your IP address
 - Your web browser and browser information such as your flash version, JavaScript support, screen resolution, and screen colour processing ability

You have the right to object to this Google Analytics tracking. As we are not data controller over personal data obtained about you through Google Analytics, nor do we have access to it, you will need to either contact Google directly, clear your cookies after every browsing session or install the [Google Analytics opt-out extension](#).

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (telephone, e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you do not want us to use your data in this way please send us an email if you wish to opt out to admin@ness-academy.co.uk.
 - to notify you about changes to our products and services;
 - to administer our website, systems, software and services
 - to ensure that content from our website, systems, software and services is presented in the most effective manner for you and for your computer;
 - undertake research and development for future products and services;
 - support and service improvements to clients; and
 - make technical improvements to our website, any of our products and services.
- **Information we collect about you.** We will use this information:
 - to administer our website, systems, software and services and for internal operations, including troubleshooting, data analysis and survey purposes;
 - to ensure that content from our website, systems, software and services is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our systems, software and services, when you choose to do so;
 - as part of our efforts to keep our website, systems, software and services safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to provide you with the information, products and services that you request from us or that may be of interest to you;
 - to make suggestions and recommendations to you and other users of our website about products or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

Unless specified otherwise in an agreement between you and Strategic 7 Ltd in respect of the provision of services from NessAcademy, we may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected and relevant third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them where they are associated with provision of services to you or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website, systems, software and services.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Strategic 7 Ltd or any subsidiary of Strategic 7 Ltd or substantially all of the assets of the relevant company are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [terms of use](#) or terms and conditions of any product or services supplied by Strategic 7 Ltd which you have entered into and other agreements; or to protect the rights, property, or safety of Strategic 7 Ltd (and Ness Academy), our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA AND TRANSFERS OUT OF THE EEA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and the Regulation such as entering into a European Commission approved contract with the receiving party, or ensuring that the receiving party has either approved Binding Corporate Rules, certification with Privacy Shield if based in the US, or is based in a country deemed to provide adequate protection to personal data by the European Commission.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, systems, software and services you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website, systems, software and services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

As an individual whose personal data is processed by Strategic 7 Ltd you have the following rights:

- [the right to be informed](#) – which is what this privacy notice is for
- [the right to access](#) the data we hold about you
- [the right to have your data rectified if its inaccurate](#)
- [the right to erasure \(in some circumstances\)](#)
- [the right to have your data restricted or blocked from processing](#)
- [the right of data portability](#)
- [the right to object to direct marketing](#) – either use the ‘unsubscribe’ button on our emails or contact us directly
- [the right to object to processing carried out on the basis of legitimate interests](#)

To exercise any of these rights, please contact us on admin@ness-academy.co.uk.

If you are not happy with the way we have handled your data, and are unable to resolve the issue with us personally, you can complain to the [ICO](#).

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing at any time by contacting us at admin@ness-academy.co.uk or writing to us at our registered office address.

Our website, systems, software and services may, from time to time, contain links to and from our websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page or notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to admin@ness-academy.co.uk.