



## Website Privacy Policy

Please read this privacy policy (the “**Policy**”) carefully before using [www.elementalmedia.education](http://www.elementalmedia.education) (the “**Website**”). Any individual, company or corporate body (“**You**”) who uses the Website consents to the use of their personal information as described in the Policy.

The policy explains how we comply with the GDPR (General Data Protection Regulation), the DPA (Data Protection Act) [pre GDPR enforcement] and the PECR (Privacy and Electronic Communications Regulations).

This policy will explain areas of this website that may affect your privacy and personal details, how we process, collect, manage and store those details and how your rights under the GDPR, DPA & PECR are adhered to. Additionally, it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on this website. Further explanations may be provided for specific pages or features of this website in order to help you understand how we, this website and its third parties (if any) interact with you and your computer/device in order to serve it to you. Our contact information is provided if you have any questions.

Elemental Media Ltd, trading as Elemental Education (“**Elemental Media**”), is committed to ensuring that your privacy is protected. Any information requested by which you can be identified when using the Website will only be used in accordance with the Policy.

Please note that Elemental Media reserves the right to revise the Policy at any time by amending this page.

Please check this page from time to time to take notice of any such changes.



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## The DPA & GDPR May 2018

We and this website complies to the DPA (Data Protection Act 1998) and already complies to the GDPR (General Data Protection Regulation) which comes into effect from May 2018. We will update this policy accordingly after the completion of the UK's exit from the European Union.

### Information we collect



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Elemental Media may collect the following data from You:

Name and job title

Contact information including email address

Demographic information such as postcode, preferences and interests

Other information relevant to customer surveys and or offers

We may obtain some data from third parties

We may receive data about you from various categories of third parties, including:

- from providers of services which facilitate our ecommerce operations, including ecommerce platforms and payment and fraud prevention services;
- from analytics providers, advertising networks and search information providers; from data partners;
- from your friends who referred you using 'refer a friend';
- from publicly available sources; and from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites.

*IP addresses*



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We may collect information about your computer (and/or mobile device or tablet), including where available your IP address, operating system and browser type, for system administration. We do not share this information with anyone. This is fully anonymised statistical data about our users' browsing actions and patterns, and does not identify any individual.

### **Contact and Communication with us**



Users contacting this us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the regulations named in 'The policy' above.

Elemental Media may use the information that it collects from You for the following purposes:

- to communicate with You
- to send promotional emails about events, awards or other information we think you may find interesting using the email address that You have provided internal record keeping for the continued improvement of Elemental Media's products and services to improve the Website and customise it according to your preferences to occasionally contact You by email, mail or telephone for market research purposes

If You have not informed us that you do not wish to receive further information from Elemental Media, we may send you direct mail. If you do not wish to receive further emails, You will find an option to unsubscribe in all of our emails. If this option isn't available for whatever reason, please email [support@elemental.media](mailto:support@elemental.media)





## Data security

Elemental Media has implemented technologies and policies with the objective of protecting your privacy from unauthorised access and improper use and will update these measures as appropriate and as new technologies become available.

## Email Mailing List & Marketing Messages



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We operate an email mailing list program, used to inform subscribers about products, services and/or news we supply/publish. Users can subscribe through an online automated process where they have given their explicit permission. Subscriber personal details are collected, processed, managed and stored in accordance with the regulations named in 'The policy' above. Subscribers can unsubscribe at any time through an automated online service, or if not available, other means as detailed in the footer of sent marketing messages (or unsubscribe from all Mailchimp lists). The type and content of marketing messages subscribers receive, and if it may contain third party content, is clearly outlined at the point of subscription.

Email marketing messages may contain tracking beacons/tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data



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## How we use cookies

A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. When you agree to accept cookies, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Elemental Media uses traffic log cookies to identify which pages are being used. This helps us to analyse data about traffic to each Website page, whilst also allowing us to improve the Website and develop it in line with your requirements. We only use this information for statistical analysis purposes before removing the data from the system.

It is important to note that cookies do not give Elemental Media any access to your computer or any information about You other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can set your browser setting to decline cookies if you would prefer or use our cookie form when you first land on our website to choose between the cookies you want or don't want.





## Advertising, Marketing and your Communication Preferences

There are lots of different ways you'll see adverts for Elemental Media, and these may not be using your personal data – sometimes we buy advertising space in the real world and on websites and in social media. If you see Elemental Media's adverts on websites and in social media, these may not be directed specifically at you, we may just have bid for the space. We may also be using a search engine or social media platform's 'lookalike' products, which are not directed at you and which you can control using each search engine or social media platform's privacy settings.

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We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and tell you about them. We may carry out direct marketing by email, phone, text and post.

On our website, we make your direct marketing preferences clear. You may choose to opt in to receive our newsletter, or as part of creating an account. We may also be able to send our customers relevant direct marketing about our own products and services unless they opted out during the purchase journey. We may also send you a little nudge as part of the purchase if you have left products in the basket without checking out.

At all times you have a right to opt out or direct marketing. The easiest way to opt out is to use the unsubscribe link at the bottom of the communication or just email us at [support@elemental.media](mailto:support@elemental.media).

We will never share your personal data with any company outside of the Elemental Media or Elemental Education Group for direct marketing purposes.

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We also work with partners to try and promote the reach of our adverts and use analytics and retargeting for this reason. We use Tracking Data to deliver relevant online advertising, including on websites and in social media.

Tracking Data, and in particular cookies, help us to deliver website and social advertising that we believe is most relevant to you and to potential new Elemental Media customers. The cookies used for this purpose are often placed on our website by specialist organisations – and this is also why when you've been on the Elemental Media website, you might see content from our website again. This is called retargeting. Cookies can also tell us if you have seen a specific advert, and how long it has been since you have seen it. This is helpful, because it means we can control the effectiveness of our adverts and control the number of times people might be shown our adverts. Cookies also help us understand if you've opened a marketing email because we don't want to send you things you don't read.



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If you want more information about Tracking Data, in particular cookies, see **Cookies** below or view our separate cookies Policy, which can be sent to you or viewed from the website.

Almost all the cookies that relate to advertising are part of third party online advertising networks. If you'd like to read about how you can control which adverts you see online, see opt-out programs established by the [European Interactive Digital Advertising Alliance](#) and the [Digital Advertising Alliance](#) (United States). We do not control cookies which are set by advertising networks.



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## Where we store your personal data?

By submitting your personal data, you agree to our storing and using it. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy. We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

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The Elemental Media website is hosted in the datacentre in Hertfordshire, and if you/a customer creates a cPanel backup, it will be stored there within the hosting. The hourly backups (with so many retained over time) are stored in their off-site storage location in Docklands, London.

We will occasionally process your data outside of the EEA (for example when using certain third party services such as Mailchimp) but will only do so if appropriate safeguards are place in accordance with data protection legislation.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site. These include appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, in addition, We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where We are legally required to do so.

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### Steps We take to secure and protect your data include:

- 1<sup>st</sup> Name, Last name; dual Password Access Control, Remote Secure online storage, Secure Transmission
- Personal Email Address; dual Password Access Control, Remote Secure online storage, Secure Transmission
- Telephone numbers; dual Password Access Control, Remote Secure online storage, Secure Transmission
- IP address; Password Access Control, Remote Secure online storage, Secure Transmission
- Web browser type and version; Password Access Control, Remote Secure online storage, Secure Transmission
- Operating system; Password Access Control, Remote Secure online storage, Secure Transmission
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to; Password Access Control, Remote Secure online storage, Secure Transmission

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Where We have given you (or you have chosen a password) which enables you to access certain parts of Our Site, you are responsible for keeping this password confidential and We as that you do not share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure and whilst We do our best to protect your personal data, We cannot guarantee the security of your personal data transmitted to Our Site; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features as outlined in this policy to try and prevent unauthorised access.

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## Do we share your data?

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. Data will only be shared and used within the bounds of the law.

We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). Where We transfer any personal data outside the EEA,

We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

- G-Suit. Secure transfers and double password Access Control, encryption at Rest.
- In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

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## Identity of Data Controller

A data controller is a person or organization who makes decisions about how your personal data is used and handled.

Elemental Media Limited is the data controller and may be contacted at:

Post: The Old Forge, Cowleigh Road, Malvern, WR14 1SH

e-mail: [support@elemental.media](mailto:support@elemental.media)

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## What personal data is collected?

We do not collect sensitive data such as information relating to or about:

- Health
- Racial or ethnic origin
- Political opinions
- Membership of a political association, professional or trade association
- Membership of a trade union
- Religious beliefs or affiliations
- Philosophical beliefs
- Sexual orientation or practices
- Criminal record
- Biometric information

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Information that you provide to us (“personal information”) may include:

- Name,
- Postal address,
- e-mail address,
- Telephone number

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In addition, we may collect other information that is about you but individually does not identify you, such as age, gender or ethnicity.

We may also ask you for information when you enter a contest or promotion sponsored by us or when you complete user surveys.

Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us.  
Your responses to surveys that we might ask you to complete for research purposes.

#### Third-party Information Collection

When you use our website or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

Advertisers, ad networks and ad servers.

Analytics companies.

Your mobile device manufacturer.

Your mobile service provider.

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These third parties may use tracking technologies to collect information about you when you visit the website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps and other online services websites. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.



### Links to other websites

Please note that the Website may contain links to other websites. Once you have used these links to leave the Website we do not have any control over the website you land on ("**Other Websites**"). For this reason, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting Other Websites and Other Websites are not governed by this Policy.

### Shortened URL's

URL shortening is a technique used on the web to shorten URL's (Uniform Resource Locators) to something substantially shorter. This technique is especially used in social media and looks similar to this (example: <https://goo.gl/ap6coA>). Users should take caution before clicking on shortened URL links and verify their authenticity before proceeding.





We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should, therefore, note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

If You do not want the information to be used by Elemental Media for marketing purposes, which may prevent you receiving details of special events etc. please inform us by emailing [support@elemental.media](mailto:support@elemental.media)

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If You have previously agreed to Elemental Media using your personal information for direct marketing purposes, You may change your mind at any time by emailing [support@elemental.media](mailto:support@elemental.media)

Elemental Media will not sell, distribute or lease your personal information to third parties unless we have your express permission to do so or are required by law to do so.

You may request details of personal information that we hold about you under the Data Protection Act 1998. If You would like a copy of the information held on You please write to Elemental Media, The Old Forge, Cowleigh Road, Malvern, WR14 1QD.

If You believe that any information we are holding about You is incorrect or incomplete, please write to us or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

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## Social Media Policy & Usage

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

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## Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

### Request access to your personal data

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

### Request correction of your personal data

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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## Request erasure of your personal data

This enables you to 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 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.

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## Object to processing of your personal data

This enables you to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

## Request restriction of processing your personal data

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c)

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where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### Request transfer of your personal data

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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### Right to withdraw consent

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please see How to contact Elemental Media about privacy above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is

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not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

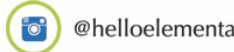
We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



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### Finally a small request from Elemental Media

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

### Contact us

If you have any queries or concerns relating to the Terms, the Website, the Content, or the Policy, please email [support@elemental.media](mailto:support@elemental.media)

Thank you for visiting us.



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## Resources & Further Information

Overview of the GDPR – General Data Protection Regulation

Data Protection Act 1998

Privacy and Electronic Communications Regulations 2003

The Guide to the PECR 2003

Twitter Privacy Policy

Facebook Privacy Policy

Google Privacy Policy

Linkedin Privacy Policy

Mailchimp Privacy Policy

HR Form Templates

Website Privacy Policy Template

v.4.0 May 2018 Edited & customised by: ### Elemental Media Ltd ###

