<u>Unloc Privacy Statement</u>

This privacy policy will explain how Unloc as an organisation uses the personal data we collect from you when you use our website.

Topics:

- What data do we collect?
- How do we collect your data? How will we use your data?
- How do we store your data?
- Marketing
- What are your data protection rights?
- What are cookies?
- Essential cookies
- Functional cookies
- Personal cookies
- How to manage your cookies
- How to contact us
- How to contact the appropriate authorities

<u>Data Collection</u>

Unloc collects the following data through our websites:

- Name
- Email address
- Bank or credit card information
- Google or microsoft account details
- IP address

Informed consent is when:
- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Unloc Learning Limited will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.
When collecting data, Unloc Learning Limited will ensure that the Individual/Service User:
1. Clearly understands why the information is needed
2. Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing

3. As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
4. Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
5. Has received sufficient information on why their data is needed and how it will be used

As part of Unloc's frequent activities, the following special categories of data are collected for specific purposes in line with the above process for gaining informed consent and Article 9 of GDPR legislation:
- Data concerning health.
- Trade union membership.

We collect data and process data when you:
- Register online or place an order for any of our services.
- Use or view our website via your browser's cookies.

Our Company may also receive your data indirectly from the following sources:
- Your school or college provider transfers your data to us to create an online account to access Unloc Online.

Personal Information We Collect From Third Parties
If you link, connect or login to our Unloc Online platform through a third party service in the form of Single Sign-On (e.g. Google & Microsoft), you direct the service to send us information as controlled by that service or as authorised by you via your privacy settings with the provider. The information that will be shared with Unloc Online will be;
- First & Last Name
- Email Address

Data Storage
Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers. Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. It is Unloc Learning Limited's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

Data is shared with and stored using the following third parties as required for business critical purposes:

- Google Workspace
- Monday.com
- Mailchimp
- Mailgun
- Web based service (Wordpress)

What are your data protection rights?

Unloc would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** - You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** - You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete information you believe is incomplete.
- **The right to erasure** - You have the right to request that Our Company erase your personal data, under certain conditions.
- **The right to restrict processing** - You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** - You have the right to object to Our Company's processing of your personal data, under certain conditions.
- **The right to data portability** - You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

In case of any queries or questions in relation to this policy please contact the Unloc Learning Limited Data Protection Officer: Ryan Waters - ryan@unloc.org.uk, 02394 008180.

Unloc Cookies Policy

1. About Cookies

Cookies are data files that are sent between web servers and web browsers to recognise a particular user's device when the user accesses a website. They are used for a range of different purposes, such as customising a website for a particular user, helping a user navigate a website, improving that user's website experience, storing that user's preferences and login information, and optimising advertising campaigns.

Cookies can be classified as either 'session' or 'persistent' cookies. Session cookies are placed on your browser when you access a website and last for as long as you keep your browser open. Persistent cookies are placed on your computer when you access a website and expire at a fixed point in time or if you manually delete them from your browser, whichever occurs first. Cookies will be set either by our website server or by third party domains on our behalf. Cookies used by our website server are referred to as 'first party' cookies. Cookies used by third party domains are referred to as 'third party' cookies. Cookies do not usually contain personal information. Cookies may, however, be used in combination with other information to identify you.

We use first party and third party cookies on our website, and both session and persistent cookies.

2. Essential Cookies

These are cookies which are necessary in order for us to run our website and its essential functions. We use essential cookies for the following purposes on our website:

- To keep you logged in through session cookies.
- To process course payments.
- To speed up unloc.online.
- To save your cookie preferences.

You can find a full list of the essential cookies below:

Cookie Name:	Purpose:
wordpress_test_cookie	WordPress sets a cookie named wordpress_test_cookie to check if the cookies are enabled on the browser to provide appropriate user experience to the users. This cookie is used on the front-end, even if you are not logged in.
S	This is a necessary session cookie to enable proper use of the website.
__cf_bm	The __cf_bm cookie is a cookie necessary to support Cloudflare Bot Management, currently in private beta. As part of our bot management service, this cookie helps manage incoming traffic that matches criteria associated with bots.
cookiefirst-id	This cookie contains your unique ID so CookieFirst can identify unique visitors to this website.
cookiefirst-consent	This cookie saves your cookie preferences for this website. You can change these or withdraw your consent easily.

3. Functional Cookies

These are cookies that store information about your preferences and recognise you whenever you return to a website, in order to improve your website experience and personalise it for you. We use functional cookies for the following purposes on our website:

- to recognise you when you return to our website.
- to improve your experience of our website.
- to display video content hosted by third parties.
- to provide 1:1 chat support on our website.

Unloc.online uses embedded Youtube videos within its courses. The videos include tracking cookies for personalisation of Youtube's ads suited to your interests.

You can find a full list of the functional cookies we use below:

Cookie Name:	Purpose:
__stripe_sid	Stripe Payment
__stripe_mid	Stripe Payment, Stripe is used to making credit card payments. Stripe uses a cookie to remember who you are and to enable the website to process payments without storing any credit card information on its own servers.

4.Performance Cookies

We use third party cookies on, via, or in relation to our website in order to analyse your use of our website. Third party performance/analytics cookies used in relation to our website include:

Google uses cookies to collect and process data about how users use websites, including for the purpose of tracking such data on an anonymous basis. For more information on how Google uses data when you use our partners' sites or apps, please visit www.google.com/policies/privacy/partners/.

Hotjar uses cookies to collect and process data about how users use our websites, including for the purpose of tracking such data on an anonymous basis. You can find out how Hotjar uses your information and how they use cookies by accessing their privacy policy at https://www.hotjar.com/legal/policies/privacy/.

You can find a full list of the performance cookies we use below:

Cookie Name:	Purpose:
_gid	Registers a unique ID for a website visitor and tracks how you the visitor uses the website. The data is used for statistics.
gat*****	Set by Google Analytics to control the request rate.
_ga	Registers a unique ID for a website visitor and tracks how you the visitor uses the website. The data is used for statistics.

This document was approved on Monday 2nd August 2021 and is due for review two years from this date.

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