

2 Simple Ltd Privacy Notice

1. Introduction

1.1 Welcome to the privacy notice for the following services operated by 2Simple Ltd (“2Simple”) accessed through our websites:

- Purple Mash
- 2Build a Profile

1.2 2Simple respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use our services (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1.3 This privacy notice aims to give you information on how 2Simple collects and processes your personal data through your use of our services, including any data you may provide through them when you use one of our services or sign up to communications with us or take part in any of our competitions.

1.4 It is important that you read this privacy notice together with our Data Processing Agreement where it may apply to you, so that you are fully aware of how and why we are using your data.

2. Controller and Processor relationship

2.1 2Simple may act as a joint controller and/or a processor depending on what basis you access the services. This privacy notice is issued on behalf of 2Simple.

2.2 We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice.

2.3 If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below.

Mark Welham

support@2simple.com

2Simple Limited, Enterprise House, 2 The Crest, Hendon, London, NW4 2HN

2.4 You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. Changes to the privacy notice and your duty to inform us of changes

3.1 This version was last updated on 24 May 2018.

4. The data we Process

4.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

4.1.1 Identity Data includes first name, last name, username or similar identifier, title, date of birth and educational cohort.

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4.1.2 Contact Data includes billing address, delivery address, email address and telephone numbers.

4.1.3 Transaction Data includes details about payments to and from you and other details of services you have purchased from us.

4.1.4 Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our services

4.1.5 Profile Data includes your username and password, your interests, preferences, feedback and survey responses.

4.1.6 Usage Data includes information about how you use our services.

4.1.7 Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

4.1.8 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific service feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

4.2 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

5. If you do not provide personal data

5.1 Where we need to collect and process personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

6. How is your personal data provided?

6.1 We receive personal data through different means including:

6.1.2 Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

6.1.2.1 Apply for our services.

6.1.2.2 Create an account for our services.

6.1.2.3 Subscribe to our service

6.1.2.4 Request marketing to be sent to you;

6.1.2.5 Enter a competition, promotion or survey.

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6.1.2.6 Give us some feedback.

6.1.3 Automated technologies or interactions. As you interact with our services we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

6.1.4 Third parties or publicly available sources. We may receive personal data about you from various third parties such as:

6.1.4.1 Analytics providers such as Google based outside the EU.

6.1.4.2 Search information providers such as Google based outside the EU.

6.1.4.3 Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.

6.1.4.4 Identity and Contact Data from data brokers or aggregators based inside the EU.

6.1.4.5 Identity and Contact Data from publicly available sources such as Edubase based inside the EU

7. How we use your personal data

7.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

7.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.

7.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

7.1.3 Where we need to comply with a legal or regulatory obligation.

7.2 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

8. Purposes for which we will use your personal data

8.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

8.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a customer or user	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver services including:	(a) Identity (b) Contact	(a) Performance of a contract with you

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(a) Manage payments, fees and charges (b) Collect and recover money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	(b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and our websites and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant service content to you and measure or understand the effectiveness of this	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our websites and services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website and services updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business)

9. Marketing

9.1 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

9.2 You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

10. Opting out

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10.1 You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by Contacting us at any time.

11. Cookies

11.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our services may become inaccessible or not function properly.

12. Change of purpose

12.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

12.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

12.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

13. Disclosures of your personal data

13.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in section 8 above.

13.1.2 Internal Third Parties being other companies in our group acting as joint controllers or processors and who provide IT and system administration services.

13.1.3 External Third Parties, being:

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

13.1.4 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

13.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

14. International Transfers

14.1 We do not transfer your personal data outside the European Economic Area.

15. Data Security

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15.1 We have put in place 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.

15.2 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.

16. Data retention

16.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

16.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

16.3 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

16.4 In some circumstances you can ask us to delete your data see “request erasure” below for further information.

16.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

17. Your legal rights

17.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data as set out below. If you wish to exercise any of the rights set out above, please contact us. You have the right to:

17.1.1 Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

17.1.2 Request correction of the personal data that we hold about you. 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.

17.1.3 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.

17.1.4 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

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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.

17.1.5 Request restriction of processing of 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) 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.

17.1.6 Request the transfer of your personal data to you or to a third party. 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.

17.1.7 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

17.2 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.

17.3 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 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.

17.4 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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