

## OUR COMMITMENT

- To comply with our obligations under the upcoming [General Data Protection Regulation](#) (GDPR), coming into effect on May 25<sup>th</sup> 2018 and any other relevant legislation;
- To keep your personal information and the business you do with us in strict confidence;
- To obtain your personal information lawfully, fairly, and without bias, in a secure fashion;
- To maintain our records to the best of our ability while adhering to standards of privacy;
- We pledge not to use your data for any other purpose than our core business practices. We also pledge not to sell your data to any outside agency without your written consent.

## PRIVACY POLICY

This is the privacy policy ("Privacy Policy") for Speak up London.

This Privacy Policy describes how we treat personal data received about you when you visit the Speak Up London website or otherwise. Please read this Privacy Policy carefully, because by visiting or using this site or contracting with us, you agree to its terms. This Privacy Policy applies only to this website and associated mobile applications.

We may revise this Privacy Policy from time to time. We will notify you of any important changes by posting a notice on all Privacy Policy links. If you see a notice of change, please check the Privacy Policy, because your continued use of the site after we post the change means you have agreed to the new terms.

## COLLECTION OF YOUR PERSONAL DATA

We collect your personal data when you ask for information about our courses, accommodation, airport transfers and other services, or products, when you submit your answers to our assessment quizzes or surveys, when you request a trial session, when you enrol in one of our courses or order study materials.

To process your enquiries and assessment quizzes or surveys, we collect your name, email and postal addresses and phone number.

To process enrolments and orders, we may ask for your name, email and postal addresses, phone number, date of birth, professional certification or registration information, identity document and credit or debit card information.

We may also use your postal and email addresses to send you information about further



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professional training, and other services or products similar to those you have ordered from us. If you do not wish us to send you this additional information, you can let us know by following the opt-out instructions that we include in every email, or by sending us notice of your preferences to [info@speakuplondon.com](mailto:info@speakuplondon.com)

## COLLECTION OF CHILDREN'S PERSONAL DATA

Speak Up London does not knowingly collect or solicit any information from anyone under the age of 16, unless this information comes from an adult who is responsible for the under 16. In the event that we learn that we have collected Personal Information from a child under age 16 without verification of parental or legal representative consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 16, please contact us at [info@speakuplondon.com](mailto:info@speakuplondon.com)

## PURPOSES FOR SHARING YOUR DATA

We may use and disclose Personal Information only for the following purposes:

**Promotional use of our Services:** If you use any of our Services and we think you might benefit from using another (new) Service we offer, we may send you an email about that. You can stop receiving our promotional emails by following the unsubscribe instructions included in every email we send.

**Billing purposes and collection of money for Services provided by us:** This includes payment details, sending you emails, invoices, notices, payment reminders, receipts and credit card information. In case of services requiring payment, we request credit card or other payment account information, which will be used solely for processing payments. We will not store your financial information.

Subject to your prior consent and where necessary for processing future payments, your financial information will be stored in encrypted form on secure servers of PayPal or Stripe, who are beholden to treating your Personal Information in accordance with this Privacy Policy.

**Newsletters:** We may send you newsletters to inform you about temporary or permanent changes to our system and/or Services such as version updates, releases, new features, promotions, campaign notifications and changes to our Terms. You can unsubscribe at anytime by following the instructions present in every email.

**To enforce compliance with our Terms and applicable law:** We may disclose Personal Information where we, in good faith, deem it appropriate or necessary to prevent violation of our Terms, or our other agreements; take precautions against liability; protect our rights, property, or safety, or those of a partner, any individual or the general public; maintain and protect the security and integrity of our Website and/or Services or infrastructure; protect ourselves and our Website and/or Services

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from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third party claims or allegations; or assist government regulatory agencies. This may include developing tools and algorithms that help us prevent violations.

To protect the rights and safety of our Users and third parties, as well as our own.

To meet legal and regulatory requirements: We may disclose Personal Information if we have a good-faith belief that doing so is required by a subpoena, warrant, or other judicial or administrative order or otherwise required by law. Including responding to lawful requests by public authorities, such as national security or law enforcement requirements.

To prosecute and defend a court, arbitration, or similar legal proceeding.

We may exchange your Personal Information with our representatives and with our service providers that assist us with archival, auditing, accounting, User contact, legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, research, investigation, website or technology services to help us comply with legal, accounting, or security requirements.

Combined Information: We may combine Personal Information with other information we collect or obtain about you (such as information we source from our third party partners), to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this Privacy Policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the precautions in this Privacy Policy applicable to, Personal Information.

## WAYS OF SHARING YOUR DATA

### Promotional Bundles

We may, from time to time, offer bundles or other promotions on our Websites or through social media. Participation in Our Promotions is completely voluntary. Information requested for entry may include personal contact information such as your name, address, date of birth, phone number, email address, username, and similar details. We use the information you provide to administer Our Promotions. We may also, unless prohibited by the Promotion's rules or law, use the information provided to communicate with you, or other people you select, about our Services. We may share this information with our Service Providers in line with this Privacy Policy and the terms posted for the promotion.

### Newsletter

If you wish to subscribe to our newsletter, we ask for contact information such as name and email address. You will occasionally receive information about the Services, promotions and updates. We provide a way to opt-out of these communications via the unsubscribe mechanism at the bottom of each email.

From time to time we may make material changes to our Terms and we notify our Users about these



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changes by email. Users may not opt-out of these communications, though they can unsubscribe at any time. However, these communications are not promotional in any nature.

## User Support

We communicate with Users on a regular basis to provide requested Services. We reply via email or social media, in accordance with the User's wishes.

## SECURITY

### Maintaining Security

Speak Up London takes reasonable and appropriate efforts to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Information.

### Accuracy and Retention of Data

We do our best to keep your data accurate and up to date, to the extent that you provide us with the information we need to do so. If your data changes (for example, if you have a new email address), then you are responsible for notifying us of those changes. Upon request, we will provide you with information about whether we hold, or process on behalf of a third party, any of your Personal Information. We will retain your information for as long as needed to provide you with our Services. We may also retain and use your information in order to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our Terms.

### Review and correction

You may review and update the personal data you have provided to us by emailing us at [info@speakuplondon.com](mailto:info@speakuplondon.com), or sending your request by post to:

Attention: Privacy Inquiry  
Speak Up London Ltd  
139 Oxford Street  
London, W1D 2JA

## PRIVACY AND COOKIES

In order to maintain quality of service for customers and provide a better user experience, <http://www.speakuplondon.com> collects certain information about visitors to its website using cookies.

A cookie is a small piece of information sent by a web server to a web browser, which enables the

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server to collect information back from the browser and help us to provide him/her with the best possible experience.

Cookies can be used to make visiting a website more personal and efficient. For instance,

- displaying relevant navigation settings
- remembering your preferences
- improving the overall user experience

## THE COOKIES USED BY <http://www.speakuplondon.com>

### Functional cookies

These are cookies, which enable users to view <http://www.speakuplondon.com>, use the functions on the websites and remember settings to improve their visits.

### Analytic cookies

These cookies help us to improve service and overall user experiences. The cookies collect information about the way in which visitor's use <http://www.speakuplondon.com>, including information about the browser usage, new visitor numbers, most visited pages, response to marketing activity and browsing times. Web Analytics cookies are one example of this type of cookie.

### Marketing and other cookies

We may also use marketing cookies to show visitors our own advertisements on other websites (remarketing), potentially based on which pages they have visited. Trusted third parties typically place these cookies.

These cookies are used to:

- Show relevant and personalized advertisements based on your visits to <http://www.speakuplondon.com>
- Measure the effectiveness of online advertising campaigns

### Embedded content

To support our content, we sometimes embed photos and video content from websites such as YouTube, Twitter, Facebook, Instagram. As a result, when you visit a page containing such content, you may be presented with cookies from these websites. Speak Up London does not control the dissemination of these cookies and you should check the relevant third party's website for more information:

[YouTube](#)

[Twitter](#)

[Facebook](#)

[Instagram](#)

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer.

To learn how to change your setting of cookies, please visit <https://www.aboutcookies.org/>.

Please note that, if you adjust the cookie settings for <http://www.speakuplondon.com>, this may prevent you from taking full advantage of our site afterwards.

### **What to do if you don't want cookies to be set?**

If you prefer, it is possible to block some or all cookies or even to delete cookies that have already been set; but you need to be aware that you might lose some functions of that website. To do this, please follow the instructions below, which outline "how to turn off cookies on your browser".

There are also instructions in each category of cookies above, which give information on how to opt out of some individually, for example Google Analytics.

### **How to turn off cookies on your web browser for all websites**

All recent versions of popular browsers give users a level of control over cookies.

Users can set their browsers to accept or reject all, or certain, cookies. Users can also set their browser to prompt them each time a cookie is offered. The main browser types and instructions on how to turn off cookies for ALL sites are available on the [aboutcookies.org](http://www.aboutcookies.org) website.

We recommend that if you do find the use of cookies intrusive that you follow the instructions on this website and turn them off for all websites.

## **CONTACT US FOR MORE INFORMATION**

If you have any questions about our Privacy Policy, the information we have collected from you online, the practices of this Website, or you wish to access or correct the Personal Information we hold about you, please contact us at [info@speakuplondon.com](mailto:info@speakuplondon.com)

21.05.2018

*Speak Up London Privacy Policy*

*Version 1.0*