



PRIVACY AND COOKIE POLICY

in respect of

JL Corinthian Limited

Privacy and Cookie Policy

Why you should read this policy

We ask that you read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

<https://www.jlcorinthian.com/> (Website) is brought to you by JL Corinthian Limited, a company incorporated and registered in England and Wales under company number 09594869 whose registered office address is at SG House, 6 St. Cross Road, Winchester, Hampshire.

We take the privacy of our customer and Website visitors very seriously. We ask that you read this privacy policy (Policy) carefully as it contains important information about how we will use your personal data.

JL Corinthian Limited (**'We' or 'us'**) collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. We are responsible as 'controller' of that personal information for the purposes of those laws.

Our collection and use of your personal information

Information that you provide

We will obtain personal information you provide when you send us feedback, submit data onto our website, via email or over the phone, post material, complete forms, report a problem with the website, contact us for any reason and by any medium and sign up for a service.

We may collect, store or process data that is labelled as sensitive under the General Data Protection Regulation 2018 ('GDPR'). If such data is requested, you will be given additional information as to why the sensitive personal data is being requested and how it will be used, often this will be required to provide you with our services.

We may retain a record of any contact you make with us.

The personal information we collect about you depends on the particular activities carried out and the reason for the processing. Such information includes, but is not limited to:

- your name, address and contact details;
- details of any feedback you give us by phone, email, post or via social media; and
- information about the services we provide to you.

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data.

Information from third parties

Occasionally we may receive information about you from other sources, which will be added to the information already held about you in order for us to help supply our services and products to you.

Information that will be collected automatically

Cookies: We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go to and traffic data. This information helps to build a profile of users to the Website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on the use of cookies on the Website, please see the sections on cookies below.

How your personal data will be used

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or JL Corinthian Limited	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect

What we use your personal information for	Our reasons
	<p>criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
Updating customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <p>—existing and former customers;</p> <p>—third parties who have previously expressed an interest in our services;</p>	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers

What we use your personal information for	Our reasons
—third parties with whom we have had no previous dealings.	
We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.	For our legitimate interests or those of a third party, i.e. to ensure our employees are trained to provide you with the best possible service.
To notify you of changes to the Website or to our services or products that may affect you	For our legitimate interests or those of a third party, i.e. to ensure you're up to date with our services and to promote any change.
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

Disclosure of your personal data

We routinely share personal information with:

- third parties we use to help deliver our services to you, e.g. payment service providers and psychometric testing providers;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- our bank.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Transfer of your information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

Non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure.

For example, for servers located in the US, we would look for compliance with the **EU-US Privacy Shield Framework**, which offers compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can find more information about Privacy Shield at <https://www.privacyshield.gov/welcome>. You can also check specific companies' certification at https://www.privacyshield.gov/participant_search.

Marketing

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes. This means we do not usually need your consent to send you promotional

communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at joe@jlcornthian.com

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Your Rights

Under the General Data Protection Regulations (GDPR), you have the following rights:

- You have the **right to be informed** about the collection and use of your personal data.
- You have the **right of access** to your personal records or other information that we hold about you. We reserve the right to charge a reasonable fee for our administrative costs involved with providing you with access if we receive a request which is manifestly unfounded or excessive to access personal records. We may also charge a reasonable fee, in relation to administrative costs, if further copies of your data is requested following your initial request.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You may have the **right to have the data we hold about you erased**.
- You have the **right to restrict processing**.
- You have the right to ask us to **stop processing your personal data for direct marketing purposes**. You may also specify that you object to direct marketing by particular channels such as by email or telephone. If this is the case, please specify the channels you are objecting to in your communications with us.
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in an electronic format such as a PDF file, CSV file or via other electronic means. We reserve the right to charge a reasonable fee for the administrative costs of complying with any requests that are manifestly unfounded or excessive.
- You have the **right not to be subject to automated decision-making, including profiling**.

To revise your consent, request access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at joe@jlcornthian.com

You may need to provide proof of identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

How long we will store your data

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Children

Due to the nature of our business, our customers are not children or parents on behalf of their children. Therefore, we do not actively collect and process the personal data of anyone under the age of 18.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also confirm that your data will be stored on secure servers.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access the Website. We use cookies and other online tracking devices on the Website to:

- obtain information about your website preferences and tailor its operations to your needs;
- identify which pages are being used, helping us to analyse data about web page traffic and ways to improve our website in order to tailor it better to our customer needs;

The information we obtain from the use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you, but only where you voluntarily provide it.

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

Description of cookies

The cookies that we utilise on our Website are placed to fulfil such functions as analysing how you use the Website to give you a better and more personalised experience, generate statistical data and allow visitors to share content with a range of networking and sharing platforms.

Some of the cookies we utilise on our Website include:

Cookie Name	Cookie Description
Crumb	Prevents cross site request forgery (CSRF). Duration: session
ss_cid	Identifies unique visitors and tracks a visitor's sessions on a site. Duration: 2 years
ss_cpvisit	Identifies unique visitors and tracks a visitor's sessions on a site. Duration: 2 years
ss_cvvisit	Identifies unique visitors and tracks a visitor's sessions on a site. Duration: 30 minutes

ss_cvt	Identifies unique visitors and tracks a visitor's sessions on a site. Duration: 2 years
ss_cvt	Identifies unique visitors and tracks a visitor's sessions on a site. Duration 30 minutes

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

Changes to this Policy

This privacy notice was last updated on 26.06.2020

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to joe@jlcornthian.com

Concerns and Questions

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](https://ico.org.uk/concerns/) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.