



# Privacy Policy and Cookie Notice

Connections in Mind (we/us/the Company) are committed to protecting and respecting your privacy.

This policy (together with our Websites Terms of Use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting [www.connectionsinmind.com](http://www.connectionsinmind.com) and/or [www.cimlearning.com](http://www.cimlearning.com) (the Sites), you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Connections in Mind, Nightingale House 46-48 East Street Epsom Surrey KT17 1HQ (our Company Address).

# Information we may collect from you

We may collect and process the following data about you:

## **Information you give us.**

You may give us information about you by filling in forms on the Site/s or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the Site/s, request a quote, subscribe to our marketing database, subscribe to our services, search for a product or services, place an order on our site, participate in discussion boards and forums, blogs, or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with the Site/s. The information you give us may include your name, address, email address and phone number, financial and credit card information, personal description and photograph, amongst other information.

## **Information we collect about you.**

With regard to each of your visits to the Site/s, we may automatically collect the following information;

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site/s (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

**Information we receive from other sources.**

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

# Cookies

The Site/s uses cookies to distinguish you from other users of the Site/s. This helps us to provide you with a good experience when you browse the Site/s and also allows us to improve the Site/s. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

**Strictly necessary/essential cookies.**

These are cookies that are required for the operation of the Site/s. They include, by way of general example, cookies that enable you to log into secure areas of the Site/s, use a shopping cart, or make use of e-billing services.

**Analytical/performance cookies**

These allow us to recognise and count the number of visitors and to see how visitors move around the Site/s when they are using it. This helps us to improve the way the Site/s works by, for example, ensuring that users are finding what they are looking for easily.

**Functionality cookies.**

These are used to recognise you when you return to the Site/s. This enables us to personalise our content for you, greet you by name, and remember your preferences (for example, your choice of language or region).

**Targeting cookies.**

These cookies record your visit to the Site/s, the pages you have visited and the links you have followed. We will use this information to make the Site/s and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site.

# Uses made of the information

We may use information held about you in the following ways:

## **Information you give us.**

We may use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- to provide you with information about other services we offer that are similar to those that you have already enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS/Whatsapp) with information about services similar to those which were the subject of a previous enquiry by you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details onto third parties for marketing purposes, please notify us in writing;
- to notify you about changes to our service;
- to ensure that content from the Site/s is presented in the most effective manner for you and for your computer

## **Information we collect about you.**

We will use this information:

- to administer the Site/s and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Site/s to ensure that content is presented in the most effective manner for you and for your computer;

- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep the Site/s safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of the Site/s about goods or services that may interest you or them.

**Information we receive from other sources.**

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

# Disclosure of your information

We may share your personal information with any member of our group, which means any subsidiaries, any ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;

- Analytics and search engine providers that assist us in the improvement and optimisation of the Site/s; and
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

# Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your enquiries, the processing of

your payment details and/or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

# Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting us at the Company Address.

The Site/s may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



# Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

# Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

# Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be directed to [info@connectionsind.co.za](mailto:info@connectionsind.co.za).