

Synergy Learning Privacy Policy

Effective Date: 24 April 2018

New Media Warehouse Limited, trading as Synergy Learning (“**Synergy Learning**”, “we”, “us”, or “our”) respect your privacy.

This Privacy Policy (the “**Policy**”) applies to the processing of Personal Information collected in connection with the Synergy Learning website www.synergy-learning.com as well as all related websites, networks, applications, and other services that we provide to you (collectively, our “**Service**”).

In addition, we obtain, process and host Personal Information via the services that we provide to our customers. Our customers are the data controllers for the Personal Information that we process to offer these services. For more information on these activities, please refer to the privacy policy of the customer who submitted your data to our services.

This Policy describes the Personal Information that we gather from you in connection with the Service, how we use and disclose such information, and the steps we take to protect such information. It also tells you about your rights and choices with respect to your Personal Information, and how you can reach us to update your Personal Information or get answers to questions you may have about our privacy practices. By using the Service, you consent to the privacy practices described in this Policy as well as the terms of any Agreement you have made with Synergy Learning. Capitalized terms used but not defined in this Policy have the meaning given to them in such Agreement.

1. Personal Information We May Collect

For the purpose of this Privacy Notice, “Personal Information” means any information relating to an identified or identifiable individual. In connection with our Service, we obtain Personal Information relating to you from various sources described below.

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from our Service if that

information is necessary to provide you with our Service or if we are legally required to collect it.

1. Personal Information Provided by You

In connection with our Service, we ask you to provide certain Personal Information when you request a resource, indicate that you would like us to contact you, send us customer service-related requests, or otherwise use the Service. You may also provide us your Personal Information when you interact with us at trade shows or events. You may provide us with your name, email address, town, country, position, job role, company information (e.g., company name, size, sector, needs) and any other information you communicate to us (e.g., when you contact our helpdesk, when you provide your business card or let us scan your attendance data at trade shows or events). You may also provide us with information that you add to your profile, such as a picture.

2. Personal Information Provided by Partners

Our partners may provide us with your Personal Information in connection with the Service (e.g., contact details of partner employees, or employees of a subscribing organization for whom the partner manages the subscription).

3. Personal Information Obtained from Your Interaction with our Service

When you use the Service, we may send one or more small text files containing a string of alphanumeric characters (“cookies”) to your device. Some cookies disappear when you close your browser, but others may persist on your device after you close your browser and may be used on subsequent visits to the Service, such as to remember your preferences. More information on cookies can be obtained from allaboutcookies.org which provides resources and on cookie usage and how to disable them.

We may also automatically record certain information from your device by using various types of technology. This automatically collected information may include your IP address or other device address or ID, web browser and/or device type, the web pages or sites that you visit just before or just after you use the Service, the pages or other content you view or otherwise interact with on the Service, and the dates and times that you visit, access, or use the Service. We also may use these technologies to collect information regarding your interaction with email messages, such as whether you opened, clicked on, or forwarded a message. In addition, we may obtain information about your physical location, such as

geolocation features in your device, or by inference from other information we collect (for example, your IP address indicates the general geographic region from which you are connecting to the internet).

We use this information to analyse and improve our Service, including by assessing how many users access or use our Service, which content, products, and features of our Service most interest our visitors, what types of offers our customers like to see, and how our Service perform from a technical point of view.

We may use website and application analytics service provided by third parties that use cookies and other similar technologies to collect information about website or application use, report trends and target marketing messaging. These third parties include Google Analytics and Lead Forensics. You can learn about Google's and Lead Forensics practices in connection with this information collection and how to opt out of it by viewing Google's privacy options and choices as are described [here](#) or downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>, and checking

Lead Forensics Privacy Policy at: <https://www.leadforensics.com/privacy-and-cookies/>

4. Personal Information Obtained from Your Interaction with Social Media Tools

We may implement third party buttons (such as Facebook "like" or "share" buttons) that may function as web beacons even when you do not interact with the button. Information collected through third-party web beacons and buttons is collected directly by these third parties, not by Synergy Learning. Information collected by a third party in this manner is subject to that third party's own data collection, use, and disclosure policies.

5. Personal Information Obtained from Other Sources

We may obtain information, including Personal Information such as contact details, from third parties and sources other than the Service, such as our partners. If we combine or associate information from other sources with Personal Information that we collect through the Service, we will treat the combined information as Personal Information in accordance with this Policy.

6. Tailored Content and Service

We may use your Personal Information, including your contact details (name, email, country), job title, company information and automatically collected information, to provide you with personalised content, offers and communications.

2. How We May Use Your Personal Information

We may use the Personal Information we obtain about you to:

- Manage and operate our Service, including to provide access to our service portal and manage subscriptions.
- Communicate with you, including about new releases, updates on security risks, announcements of webinars, commercial updates, and customer service related communications.
- Operate, evaluate and improve our business and Service (including by developing new products and services; managing our communications; determining the effectiveness of our content, newsletter and advertising; determining your level of satisfaction; analysing our products, services and websites; facilitating and improving the functionality of our products, services and websites).
- Send you marketing communications about products, services, offers, programs and promotions of Synergy Learning and third parties (including contests, newsletters, surveys and any other marketing activities), and process and deliver entries and rewards in connection with promotions. You may have the right under applicable law to opt out of receiving promotional communications as described below under “Your Rights and Choices”.
- Personalise our marketing and Service, for example:
 1. remembering your information so that you will not have to re-enter it during your visit or the next time you visit the Service;
 2. providing you with personalised Service and recommendations, such as suggesting products or other special marketing activities that would be of particular interest to you;
 3. monitoring and analysing the effectiveness of the Service and third-party marketing activities;
 4. monitoring aggregate site usage metrics such as total number of visitors and pages viewed; and

5. tracking your entries, submissions, and status in programs and activities on the Service.
- Understand and analyse the usage trends and preferences of our users and perform data analyses to understand the distribution of various metrics across the user base.
 - Anonymise Personal Information, including for data analytics purposes.
 - Enforce any Agreement you have concluded with Synergy Learning.
 - Comply with applicable legal requirements and industry standards and our policies.

We may process your Personal Information for the above purposes when:

- You have consented to the use of your Personal Information;
- We need your Personal Information to provide you with services and products requested by you, or to respond to your inquiries;
- We have a legal obligation to use your Personal Information;
- We or a third party, have a legitimate interest in using your Personal Information, including to ensure and improve the safety, security and performance of our products and services.

3. How We Share Your Personal Information

We do not sell or otherwise disclose Personal Information we collect about you, except as described in this Privacy Notice or otherwise disclosed to you at the time the data is collected.

We may share the Personal Information we collect with our partners to whom it is reasonably necessary or desirable for us to disclose your Personal Information.

Any Personal Information that you voluntarily choose to include in a publicly accessible area of the Service will be available to anyone who has access to that content, including other users.

We also may share Personal Information with our service providers who perform services on our behalf and in relation to the purposes described in this Privacy Notice (e.g., website, application development, hosting, maintenance). We require these service providers to comply with certain data protection obligations and only process Personal Information in

accordance with our instructions and as necessary to perform services on our behalf or comply with legal requirements.

We may use advertising networks such as Google Adwords display network (GDN) that enable third parties to collect Personal Information about your online activities over time and across different online services. Full details on GDN compliance can be found here: <https://privacy.google.com/businesses/compliance/>

We also may disclose data about you: (i) if we are required to do so by law or legal process, (ii) in the good-faith belief that such action is necessary to respond to a request from a court, law enforcement authorities, or government officials, or (iii) when we believe, in good faith, that disclosure is appropriate or necessary to (a) take precautions against liability, (b) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (c) investigate and defend ourselves against any third-party claims or allegations, (d) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (e) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

We also reserve the right to transfer any information, including Personal Information we have about you, to an acquirer, successor, or assignee of Synergy Learning as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets. Should such disclosure occur, we will use reasonable efforts to direct the transferee to use Personal Information you have provided to us in a manner that is consistent with this Privacy Notice.

We may make non-Personal Information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our users' interests, habits, and usage patterns for certain programs, content, Service, advertisements, promotions, and/or functionality available through the Service.

4. Your Rights and Choices

You may, of course, decline to share certain Personal Information with us, in which case we may not be able to provide to you some of the features and functionality of the Service. If you wish to access or amend any Personal Information we hold about you, you may contact us at dpo@synergy-learning.com. Please note that while any changes you make will be reflected in active user databases within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so, to the extent permitted under applicable law.

Subject to applicable law, you have the right to request access to and receive information about the Personal Information we maintain about you, to update and correct inaccuracies in your Personal Information, to restrict or to object to the processing of your Personal Information, to have the information blocked, anonymised or deleted, as appropriate, or to exercise your right to data portability. Those rights may be limited in some circumstances by local law requirements. In addition to the above-mentioned rights, you also have the right to lodge a complaint with a competent supervisory authority subject to applicable law. Please note that these rights may be restricted and subject to conditions under applicable law.

Where required by law, we obtain your consent for the processing of certain Personal Information collected by cookies or similar technologies, or used to send you direct marketing communications, when we process Personal Information deemed sensitive pursuant to applicable law, or when we carry out other processing activities for which consent is required. If we rely on consent for the processing of your Personal Information, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal.

To update your preferences, ask us to remove your information from our mailing lists, or submit a request to exercise your rights available under applicable law, please contact us as specified in the “How to Contact Us” section below. If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt out from receiving commercial email from us by sending your

request to us by email at dpo@synergy-learning.com or by writing to us at the address given in the “How to Contact Us” section below.

Please be aware that if you opt out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten business days for us to process your request, and you may continue receiving promotional communications from us during that period, to the extent permitted under applicable law. Additionally, even after you opt out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

Your device operating system or browser may include settings, options, or add-on components to control the placement and presence of cookies and access to location information. Please note that if you choose to delete (or not to accept) cookies from the Service, or to deny the Service access to your location information, you may not be able to utilise the features of the Service to their fullest potential.

5. Children’s Privacy

Our Site is a general audience site not directed to children under the age of 16, and we do not knowingly collect Personal Information from children under the age of 16 without parental consent. If you are under 16 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Information has been collected on the Service from a child under 16 years of age without parental consent, then we will take appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 16 years of age has obtained an account on the Service, then you may alert us at dpo@synergy-learning.com and request that we delete that child’s Personal Information from our systems.

6. How We Protect Your Personal Information

We maintain administrative, technical and physical safeguards that are intended to appropriately protect Personal Information against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. We

restrict access to Personal Information about you to those employees who need to know that information to provide products or services to you. However, we cannot and do not guarantee that your information will not be accessed, viewed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service.

We also take measures to delete your Personal Information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it in the context of the Service or when you request their deletion, unless we are required by law to keep the information for a longer period. We complete periodic reviews of our databases, and have established specific time limits for data deletion, taking into account the type of service provided, the length of the customer relationship, possible re-enrolment with the Service, mandatory retention periods and the statute of limitations.

7. Third-Party Services

The Service may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

8. Data Transfers

Synergy Learning is a multinational organisation with affiliates worldwide. We also use service providers that are located in various countries. If you choose to use the Service from regions of the world with laws governing data collection and use that may differ from the laws in these countries, then please be aware that you are transferring your Personal

Information outside of those regions to these countries for storage and processing. Also, we may transfer your data from these countries to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including Personal Information, on or to the Service, you consent to such transfer, storage, and processing.

We comply with applicable legal requirements providing adequate safeguards for the transfer of Personal Information to countries outside of the European Economic Area (“EEA”).

9. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify this Policy, we will make the revised Policy available through the Service and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Service for the first time after such material changes are made. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the revised Policy. If we update this Privacy Policy, in certain circumstances, we may seek your consent.

10. How to Contact Us

If you have any questions, comments, or complaints about this Privacy Policy or our privacy practices or if you would like to exercise your rights and choices, please e-mail us at dpo@synergy-learning.com, or write to us at:

Data Protection Officer

Synergy Learning

Hollywood House, 1 Innis Court

Hollywood

Co. Down, BT18 9HF

Tel: +44 28 9042 2000