Workbooks Privacy Notice

Workbooks Online Limited ("Workbooks", "we", "us" or "our") is committed to protecting your privacy on the website **<u>www.workbooks.com</u>** ("Website").

This Notice sets out the basis on which any personal information or personal data (any information about you which is personally identifiable) that Workbooks collects from you or that you provide to Workbooks, will be processed by us. Please read the following information carefully to understand Workbooks' practices regarding your personal information.

Where you subscribe to any services provided by Workbooks, any personal data that is inputted into our software will be handled in accordance with the terms of our Master Services Agreement which incorporates a Data Processing Addendum.

Amendments and updates to this Privacy Notice may be made from time-to-time. Any revisions will be posted on this page, so you will always be aware of what information we collect and how we use that information. Please review this page regularly so that you are aware of any changes.

Our services are intended to be used by organisations. If you are using our services on behalf of an organisation, you should be aware that the organisation may control and administer your use of our services as well as access and process your information including the contents of your communications. Please direct any queries that you have regarding your organisation's control of and access to your information, to your organisation.

1. WHO ARE WE?

For the purpose of data protection legislation, the data controller is Workbooks Online Limited, company number 06393851, whose registered address is at 47 Castle Street, Reading, RG1 7SR.

Workbooks is registered with the UK Information Commissioner's Office (Z161136X).

2. INFORMATION WE HOLD AND USE

Workbooks may collect and process the following personal information about you:

• Information you provide

We will collect information relating to you that you provide when you:

- register on our Website;
- fill in a contact form on our Website;
- place an order with us for any of our services;
- sign up to a free trial;
- login to Workbooks CRM or use your Google credentials to access your account;
- subscribe to our blog;
- respond to a survey;
- request to download guides or other resources on our Website; and/or
- otherwise opt-in to receive communications from us.

This information includes personal information, such as your full name, email address and telephone number, job title, department and communications with you.

We may also collect payment and financial information and information relating to your organisation, such as your company name, company annual revenues, credit information or the type of industry you operate within.

• Information we collect about you

For each of your visits to our Website, 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; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); products 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.

We may carry out credit reference checks on you from time to time.

Social Media Widgets:

Our Website includes social media features, such as the Facebook Like button, and widgets, such as the Share This button or interactive mini-programs. These features may collect your Internet protocol address, which page you are visiting on the Website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Website. Your interactions with these features are governed by the privacy statement of the companies that provide them.

Information From Third Party Services:

We may also obtain other information, including personal information, from third parties and combine that with information we collect through our Website. For example, we may have access to certain information from a third party social media or authentication service if you log into our Services through such a service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third party social media or authentication service is in accordance with the authorization procedures determined by that service. By authorizing us to connect with a third party service, you authorize us to access and store your name, email address(es), current city, profile picture URL, and other personal information that the third party service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on these third party services to understand and change the information sent to us through these services. For example, you can log in to the Services using sign-in services such as Facebook Connect or an Open ID provider, as further described below.

Single Sign-On:

You can log into certain Services using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity, provide you with the option to share certain personal information (such as your name and email address) with us, and pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities in the Services to your profile page to share with others within your network.

3. HOW WE USE YOUR INFORMATION

We may use your information in the provision and administration of the services/materials that you and/or your organisation have requested and/or to respond to your queries. Where you don't provide us with certain information we will be unable to provide you with the services and/or materials requested.

We may also use your information to meet our legal obligations, to deal with any complaints and for the enforcement of our terms and conditions.

We may use your information for our legitimate business interests which include for security purposes, making improvements to our Website to personalise or enhance the user experience, to improve our Website and our services and for general marketing purposes. We will not do so where our interests are outweighed by your interests, rights and freedoms.

We may also use your information for a particular purpose that we have made known to you, where you have consented to us doing so.

4. WHERE WE STORE YOUR INFORMATION

Workbooks will take all reasonable steps to ensure that your information is treated securely and in accordance with this Privacy Notice.

All information you provide to Workbooks is stored by third parties as further detailed in our **Sub-processors and Sub-contractors Policy**. We take reasonable steps to ensure that any third parties hosting our Website and our other services have adequate security measures in place to protect personal data.

Where you sign up to our services, some of these are provided by Workbooks' authorised partners who may be located outside of the EU. Details regarding these partners can be found in the **Sub-processors and Sub-contractors Policy**.

Where we have given you (or you have chosen) a username and password which enables you to access our services, you are responsible for keeping these confidential and you must not disclose them to a third party.

5. DISCLOSURE OF YOUR INFORMATION

We will not sell your information and generally do not give your information to third parties but there are some exceptions and we may share your information in the following ways (as appropriate):

- in order to provide any services requested by you which may involve us sharing your information with our authorised partners/sub-processors as detailed above;;
- with any actual or prospective seller or buyer of our business and/or any assets. Information held by us about our customers and any users will be one of the transferred assets;
- with our group companies, which means our subsidiaries and holding companies;
- in order to comply with any legal obligation or as otherwise permitted by law;
- in the conduct or defence of legal claims or in order to enforce our agreements;
- for debt collection purposes;
- for security purposes or to protect our rights or those of a third party; and
- for the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any information that we collect with the Police, other public or private sector agencies, governmental or representative bodies in accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies and/or other agencies.

6. MARKETING COMMUNICATIONS

When you submit a contact form we will send you marketing communications that we feel may be of interest to you via email.

You can opt out of receiving marketing communications at any time. To stop receiving Workbooks' marketing communications, please click the link found at the bottom of each email or update your account preferences.

7. YOUR RIGHTS

- 7.1 You have a number of rights in relation to your personal information. You have the right to:
 - request information regarding the personal data that we hold about you and the source(s) of that information. You can request a copy of any personal data we hold about you. This service is usually free of charge, although we have the right to charge a 'reasonable fee' in some circumstances;
 - request that we rectify any inaccuracies in relation to the personal data we hold;
 - in some circumstances, request the erasure of your personal data or object to the processing of your data;
 - object to any direct marketing;

- in some circumstances, request that your personal data be transferred to you or a new provider if the data is processed automatically;
- withdraw consent to us processing your personal data. This will not affect the processing already carried out with your consent; and
- lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner's Office;

Any enquiries regarding the above rights or if you want to exercise any of these rights, please contact us by email to datarequest@workbooks.com or by post to Unit 9, Suttons Business Park, Suttons Park Avenue, Reading RG6 1AZ.

8. HOW LONG DO WE HOLD YOUR INFORMATION?

We will hold onto your information only for as long as is necessary for the purpose for which it was provided to us or collected eg. for as long as is necessary to provide any services requested by you or to respond to your queries. Where processing is based on your consent, we shall only process it until such time as you withdraw your consent.

Please let us know if any of your contact details change so that we can ensure we only hold accurate and up to date information.

9. COOKIES

Our Website uses cookies to distinguish you from other users. Details of the cookies we use are set out in the Cookies Policy found here: www.workbooks.com/legal/cookie-policy

10. LINKS

Some pages of our Website include external links to third party websites. We have no control over and are not responsible for these websites or the use of your information by third parties. You should check the privacy notices on any third party websites to ensure that you are satisfied regarding their privacy practices, prior to sharing any personal information.

11. BLOGS AND FORUMS

We provide users with the ability to post information in blogs and forums and to share information in a public space on the Website. Please note that anything you share will be publicly available to users and visitors to the Website. You should therefore be cautious in disclosing any personal information. You will be responsible for any personal or other information that you do choose to disclose and Workbooks shall have no responsibility for the same.

12. TELEPHONE RECORDING

We use a VOIP telephone system that is capable of recording telephone calls. We may record both inbound and outbound call for the purposes of quality monitoring, training, compliance and security purposes. We will retain the recordings for a period not exceeding 12 months. The recordings will only be used for the purposes specified in this Privacy Notice. We shall ensure that the recording of telephone calls is done in accordance with all applicable laws.

Details of the third party provider of the VOIP telephone system can be found in the. Sub-processors and Sub-contractors Policy found here: www.workbooks.com/legal/sub-processors-policy policy

13. CONTACT

Questions, comments and requests regarding this Notice are welcomed and should be sent by email to datarequest@workbooks.com or by post to Unit 9, Suttons Business Park, Reading, RG6 1AZ.