

**TRAINING**

building better businesses

**JFR Training Limited** appreciates that privacy is important to our clients and that you care about how your personal data is used and shared online.

At JFR Training Limited we are committed to protecting the privacy and security of our clients and will only collect and use personal data in ways that are described in this policy and in line with your rights under the law.

Please read the following Privacy Policy carefully to understand our views and practices regarding your personal data and how we will treat it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our site. If you do not accept and agree with this Privacy Policy, then you must stop using our site immediately.

Please note that this Privacy Policy only applies to the use of our site, which may contain links to other sites. We do not have control over how your data is collected, stored or used by other sites and therefore advise you check their privacy policies before providing any data to them.

### **Information about us**

For the purpose of the Data Protection Act 1998 (the Act), the data controller is JFR Training Limited of Craven House, Palladium House, 1-4 Argyll Street London W1F 7LD; Company Registration No. 2430625; VAT No. 530 1209 05.

The role of Data Protection Officer is fulfilled by the Directors of JFR Training Limited and can be contacted via the following email address: [info@jfrtraining.co.uk](mailto:info@jfrtraining.co.uk)

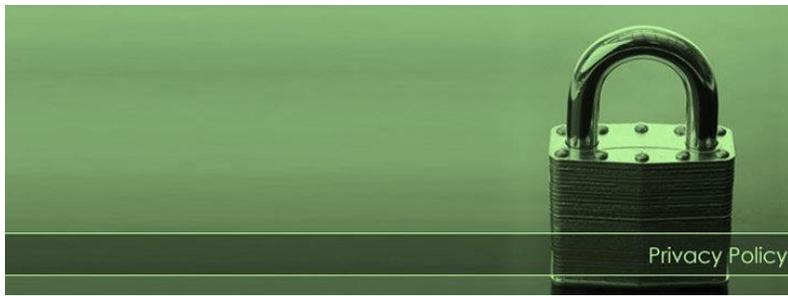
### **Data principles**

- Your information belongs to you, therefore we offer full disclosure as to the data held and ensure that it is available to you upon request
- We will protect your data in line with industry standards
- We only process your data for the following reasons:
  - ❖ For business purposes that are either necessary to fulfil the relationship between client and brand
  - ❖ Where documentation is required to be kept for legal purposes

### **Information we may collect from you**

Depending on the way in which you use our site, we may collect and process some or all of the following personal data from you:

- Any information you provide by filling in forms on our site. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site
- If you contact us, we may keep a record of that correspondence
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them
- Details of your visits to our site [including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise] and the resources that you access



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## **Uses made of the information**

We use information held about you in the following ways:

- Set up and manage your account to enable you to request services and communicate with you regarding our services.
- Ensure that content from our site is presented in the most effective manner for you and for your computer.
- Provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- Carry out our obligations arising from any contracts entered into between you and us.
- Allow you to participate in interactive features of our service, when you choose to do so.
- Notify you about changes to our service.
- Contact you if we believe you have a legitimate interest in receiving the information. For more information about our legitimate interest policy, which is detailed below.

We may also use your data, or permit selected third parties to use your data, to provide you with information about services which may be of interest to you and we or they may contact you about these by email, mail or phone.

If you are an existing client, we will only contact you by electronic means (email) with information about services similar to those which were the subject of a previous sale to you. If you are a new client, and where we permit selected third parties to use your data, we (or they) will only contact you by electronic means if you have consented to this.

## **Retention Policy**

Other than data we need to retain for legal purposes such as transaction history, we will only keep your data on file for a maximum of twelve months (unless you instruct us to extend the retention period in writing. This includes any emails sent to [info@jfrtraining.co.uk](mailto:info@jfrtraining.co.uk)

## **Where we store your personal data**

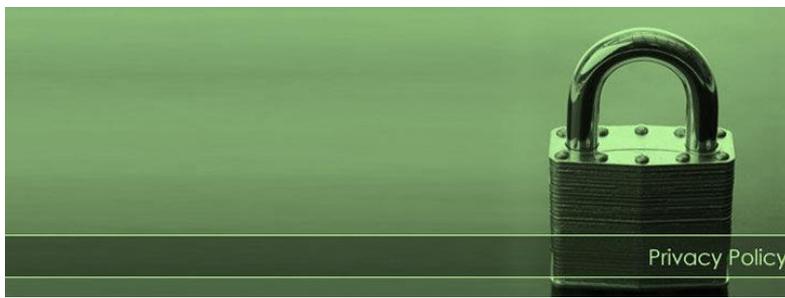
All information you provide to us is stored on our secure computer systems.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our utmost to protect your personal data, we cannot guarantee the security of your data transmitted to our 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.

## **Sharing your data**

JFR Training Limited will only share your data with third party data processors that are required in order for our business to function. These data processors include but are not restricted to:

- Any legal regulators or law enforcement agencies that may require us to share information with them for business purposes
- Email Service Providers - such as Mailchimp
- Social Media Platforms- including LinkedIn



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## Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985.

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 JFR Training Limited or substantially all of its assets are acquired by a third party, in which case personal data held by JFR Training Limited about its clients will be one of the transferred assets
- 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 terms of use Website Terms Of Use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of JFR Training Limited our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

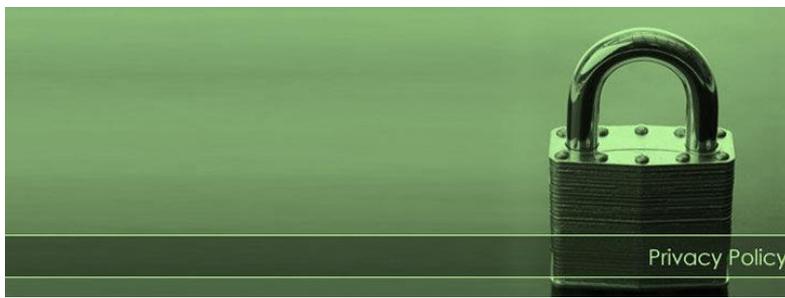
## How you control your data

You will only be contacted if you have opted in by checking certain boxes on the forms we use to collect your data and will specify if we intend to use your data for such purposes or if we intend to disclose your information to any third parties for such purposes.

We want you to have in control over your information and so we commit to giving you the ability to do the following:

- Access, amend, verify or withdraw any information held about you. You can also request a copy of the data by contacting [info@jfrtraining.co.uk](mailto:info@jfrtraining.co.uk)
- Opt out of/unsubscribe from marketing communications. This can be done within any marketing email sent to you or by contacting [info@jfrtraining.co.uk](mailto:info@jfrtraining.co.uk)
- Exercise your right to be forgotten if you no longer wish for us to store any of your personal details. Should you wish to exercise your right to be forgotten, you must contact [info@jfrtraining.co.uk](mailto:info@jfrtraining.co.uk) stating this and all applicable data will be deleted from our systems. Some data may not be able to be deleted for legal reasons such as transactional history.

Our site 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.



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## **Our use of cookies**

We may collect information about your computer, including where available your IP address, operating system and browser type and system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

- Estimate our audience size and usage pattern
- Store information about your preferences, and so allow us to customise our site according to your individual interests
- Speed up your searches
- Recognise you when you return to our site

You may refuse to accept non-essential cookies by turning them off via a pop up which will appear on your first visit to the site. Please note if you clear your cookies the pop up will appear again when you next return.

For further information you can read our full cookie policy below.

## **Contact**

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

## **Amendments to our Privacy Policy**

Any amendments we may make to our Privacy Policy in the future will be posted on this page. You will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the changes.

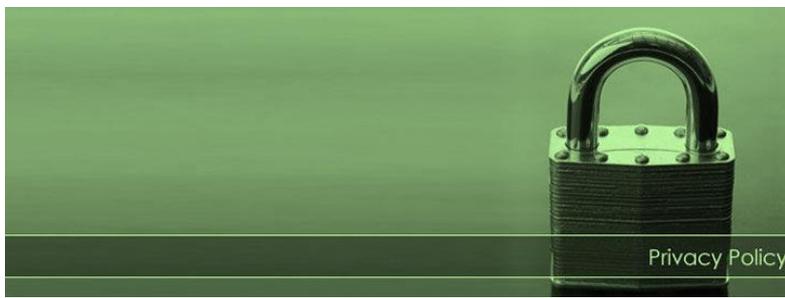
## **Legitimate Interest Statement**

The contacting of clients and relevant parties, will only be exercised under what JFR Training Limited, and the brands within it, deem the requirement of the contact, and use of the clients' data as a legitimate interest in the reason for contact.

JFR Training Limited shall only contact a person who we believe has a legitimate interest in the communication. This will in all cases be because the client has previously indicated an interest in the services provided by the brands, or, may have a professional interest in the company and the services it provides.

The channels for which a LIA (Legitimate Interest Assessment) has been conducted are as follows:

- PR
- Direct Marketing (including SMS and postal)
- Email
- Social Media



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## Cookie Policy

When you visit our site, we may use cookies to provide you with the best experience possible. There are 4 types of cookies, which are explained below:

- (1) Strictly Necessary Cookies – these cookies allow you to navigate the site and use the site’s features, such as adding products to your bag
- (2) Performance Cookies – this allows us to understand the number of users our site receives, how they use it, and where we can make improvements for the benefit of our customers. We may also use this anonymised information to create internal reports and to help us improve the website
- (3) Customer preference cookies – when you are browsing or shopping on our sites, these cookies will remember your preferences so we can make your experience as continuous and seamless as possible
- (4) Targeting or advertising cookies – These cookies help deliver targeted ads with content that we would expect you to be interested in, based on your shopping behaviours. Importantly, they also limit the number of times that you will see an ad from this site

By continuing to use this site, you are implying consent to the placement of the cookies listed and for the purposes also described above. By using our site, you agree to the placement of these sorts of cookies on your device and accessing them when you visit the site in the future.

If you do want to delete or prevent any cookies that are already on your computer, you can do so within your chosen browser, and visiting the settings. For more information about cookies, visit <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>. Please note that by deleting or disabling future cookies, your on-site experience may be affected and you might not be able to take advantage of some of the certain functions of our site, which means you would limit the experience we pride ourselves on providing options.