



Privacy Policy

This Privacy Policy sets out how we, The Career Farm Limited, collect, store and use information about you when you use or interact with our websites www.thecareerfarm.com, www.careermaximiser.com, www.mbamaximiser.com, www.mastersmaximiser.com, www.thefutureofwork.org.uk, and sub-domains of these sites (our **websites**) and where we otherwise obtain or collect information about you.

This Privacy Policy is effective from **7th November 2018**.

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller:** The Career Farm Limited
- **How we collect or obtain information about you:**
 - when you provide it to us (e.g. by contacting us, placing an order on one of our websites, using one of our Maximiser online courses, signing up for one of our webinars or for one of our email newsletters or interacting with us via an online chat box)
 - from your use of our website, using cookies and similar technologies, and
 - occasionally, from third parties.





- **Information we collect:** name, contact details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our websites (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our websites (based on your IP address), feedback you provide to us on our products and services, and any information you may input into the various modules of our online Maximiser courses.
- **How we use your information:** for administrative and business purposes (particularly to contact you and process orders you place on our websites), to improve our business and website, to fulfil our contractual obligations to you or to connected parties contracting our products and services on your behalf (e.g. your university or employer), to advertise our goods and services, to analyse your use of our website, and in connection with our legal rights and obligations.
- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you or with connected parties contracting our products and services on your behalf (e.g. your university or employer), where required by law or to enforce our legal rights.
- **Your information and third parties connected with you:** *if your account has been paid for by a third party with a connection to you* (e.g. your university, business school or employer) then we will store details of your association with that third party (e.g. that you are an employee of company X). If you are using one of our online courses, we will also provide the connected third party with limited information about your usage of the course. This will include:
 - your name
 - the date you registered for the course
 - the date you last logged in to the course
 - the number of course exercises you have completed
 - any feedback you provide about the course via our standard feedback form

We do **not** provide the connected third party with any personal information that you input into the course (your answers to the exercises) unless you give us your specific consent to do this.

- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event):** No
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled [How long we retain your information](#).
- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers, using only encrypted payment providers and only granting access to your information where necessary.
- **Use of cookies and similar technologies:** we use cookies and similar information-gathering technologies such as web beacons on our websites. For more information, please visit our cookies policy here: <https://thecareerfarm.com/cookies-policy/>





- **Transfers of your information outside the European Economic Area:** in certain circumstances we may transfer your information outside of the European Economic Area, including to the USA. Where we do so, we will ensure appropriate safeguards are in place.
- **Use of automated decision making and profiling:** we make limited use of automated decision making and/or profiling. We may from time to time use web analytics, web beacons, cookies, server logs analysis tools (profiling) or use targeting cookies to display advertisements to segments of people who visit our website when those people visit other external websites (e.g. using the Google AdSense network, Facebook ads, Twitter ads, LinkedIn ads and other similar advertising networks).
- **Your rights in relation to your information**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to a supervisory authority
- **Sensitive personal information:** we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled [Sensitive Personal Information](#).

Our details

The data controller in respect of our websites is The Career Farm Limited (company registration number: 08125802) of Harrogate Business Centre, Hookstone Avenue, Harrogate, North Yorkshire, UK, HG2 8ER. You can contact the data controller by writing to this address or sending an email to info@thecareerfarm.com.

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our websites

We collect and use information from visitors to our websites in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Web server log information

We use a third party server to host our websites, provided by SiteGround Hosting Ltd., 3rd Floor, 11-12 St. James's Square, London SW1Y 4LB. Our websites' server automatically logs the IP address you use to access our websites as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.





Our server is located in the UK, and any data held by Siteground is not transferred outside the European Economic Area (EEA).

Use of website server log information for IT security purposes

Our third party hosting provider may collect and store server logs to ensure network and IT security and so that the server and websites remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals.

Recording access to our website using server log files is such a measure.

Legal basis for processing: our and Siteground Hosting Ltd's legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we and Siteground Hosting Ltd have a legitimate interest in using your information for the purposes of ensuring network and information security.

Use of website server log information to analyse website use and improve our website

We may use the information collected by our website server logs to analyse how users of our websites interact with our websites and their features. For example, we may analyse the number of visits and unique visitors we receive, the time and date of the visit, the location of the visit and the operating system and browser used.

We use the information gathered from the analysis of this information to improve our websites. For example, we may use the information gathered to change the information, content and structure of our websites and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our websites.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: improving our websites for our website users and getting to know our website users' preferences so our websites can better meet their needs and desires.

Cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies and similar technologies on our website, including essential, functional, analytical and targeting cookies and web beacons. For further information on how we use cookies, please see our cookies policy which is available here: <https://thecareerfarm.com/cookies-policy/>

You can reject some or all of the cookies we use on or via our websites by changing your browser settings or non-essential cookies by using our cookie control tool but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser





settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Email

When you send an email to an email address displayed on one of our websites we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is Gmail and their privacy policy is available here: <https://policies.google.com/privacy>

Emails you send us will be stored within the European Economic Area on Google's servers.

Contact forms

When you contact us using one of our contact forms or webinar registration forms, we may collect your name, email address, IP address and the page you were viewing when you submitted your form. We also collect any other information you provide to us when you complete the contact form (such as your phone number, job title, employer and other questions and comments submitted by you).

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

In the case of webinars, where these are being made available to you via a connected third party (e.g. your university or employer) we may share personal details you submit through the webinar registration form with the connected third party.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example,





providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send us via our contact forms will be stored within the European Economic Area on our email provider's servers. Our third party email provider is Gmail, their privacy policy is available here: <https://policies.google.com/privacy>

Information you provide to us via webinar signup forms will be stored inside the European Economic area on the servers of our third party Webinar provider, GotoWebinar, and also on our internal servers, provided by the data hosting company Dropbox. Their privacy policies can be found at:

<https://www.dropbox.com/privacy2018>

<https://www.logmeininc.com/legal/privacy>

Both of these third party providers make provision for your information to be transferred outside of the European Economic Area as part of their backup and resilience procedures.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area

Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Information about your call, such as your phone number, the date and time of your call, and the information you provide to us during the call is processed by our third party telephone service provider which is located in the UK.

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.





Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Information we collect when you interact with our websites

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

E-Newsletters

When you sign up for one of our e-newsletters or opt to receive news, offers and other relevant information from us by entering your name and email address and clicking subscribe or ticking a box at checkout indicating that you would like to receive these communications, we collect your name, email address, IP address and details of the time you signed up and the method of signup.

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Transfer and storage of your information

We use third party providers to send out our e-newsletters and administer our mailing lists, either Aweber or Mailchimp. Their privacy policies are available here:

<https://www.aweber.com/privacy.htm>

<https://mailchimp.com/legal/privacy/>

Information you submit to subscribe for one of our e-newsletters will be stored within or outside the European Economic Area on our third party mailing list providers' servers. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons and similar technologies in emails

We use technologies such as web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates which our emails achieve.

For more information on how we use web beacons in our e-newsletter emails, see our cookies policy which is available here: <https://thecareerfarm.com/cookies-policy/>

For more information about our third party mailing list providers and how they use web beacons, please see their privacy policies which are available here:

<https://www.aweber.com/privacy.htm>

<https://mailchimp.com/legal/privacy/>





Registering on one of our websites

When you register and create an account on one of our websites, we collect the following information: name, email address, IP address, and any other information you provide to us when you complete the registration form.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our websites.

Connected third parties

If your account has been paid for by a third party with a connection to you (e.g. your university, business school or employer) then we will store details of your association with that third party (e.g. that you are an employee of company X).

If you are using one of our online courses, we will also provide the connected third party with limited information about your usage of the course. This will include:

- your name
- the date you registered for the course
- the date you last logged in to the course
- the number of course exercises you have completed
- any feedback you provide about the course via our standard feedback form

We do **not** provide any personal information that you input into the course (your answers to the exercises) unless you give us your specific consent to do this.

Legal basis for processing: necessary to perform a contract [or to take steps at your request prior to entering into a contract] (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: creating an account on our website is necessary to allow you to access the goods and services you, or a connected third party acting on your behalf, have purchased from us.

Transfer and storage of your information

Information you submit to us via the registration forms on our websites will normally be stored within the European Economic Area on our third party hosting provider's servers in the UK, and on the servers of our database backup provider in the UK. Our third party hosting provider is Siteground Hosting Limited. Our database backup provider is Amazon Web Services Limited. Their privacy policies are available here: <https://www.siteground.com/>
<https://aws.amazon.com/compliance/data-privacy-faq/>

Both of these third party providers store your information on servers located within the European Economic Area.

Information we collect when you place an order on one of our websites

We collect and use information from individuals who place an order on one of our websites in accordance with this section and the section entitled Disclosure and additional uses of your information.





Information collected when you place an order

When you place an order for goods or services on one of our websites, we collect your name, email address and country of residence.

If you do not provide this information, you will not be able to purchase goods or services from us on one of our websites or enter into a contract with us.

We also ask if you would like to receive emails from us containing additional information relating to career development. This may include information on new, relevant, products and services we or selected third parties may offer. We **never** provide any of your information to third parties for use in their own marketing activities. If you do not wish to receive additional information from us, you have an option to request that we only email you information that is necessary to manage your access to the product or service you have purchased from us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

[**Legal basis for processing:** compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions.

Processing your payment

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use a third party payment processor. Your payment will be processed by Paypal.

Paypal collects, uses and processes your information, including payment information, in accordance with their privacy policy. You can access their privacy policy via the following link:

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

Transfer and storage of your information

Paypal is located in Luxembourg. Information relating to the processing of your payment may be stored within or outside the European Economic Area on Paypal's servers.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.





Marketing communications

At checkout you will have the option of receiving marketing communications by email from us.

Our similar goods and services

You can opt-out from receiving marketing communications in relation to our goods and which are similar to those which you purchase from us, by choosing the appropriate option during the checkout process.

If you choose to receive marketing communications from us then we will send you marketing communications in relation to similar goods and services, plus information that we consider may be useful to help you with your career development.

You can unsubscribe from our marketing communications emails at any time by clicking on the unsubscribe link at the bottom of every email. If you click the link we will unsubscribe you from these marketing communications immediately.

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Transfer and storage of your information

We use third party providers to send out our e-newsletters and administer our mailing lists, either Aweber or Mailchimp. Their privacy policies are available here:

<https://www.aweber.com/privacy.htm>

<https://mailchimp.com/legal/privacy/>

Information you submit to subscribe for one of our e-newsletters will be stored within or outside the European Economic Area on our third party mailing list providers' servers. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons and similar technologies in emails

We use technologies such as web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates which our emails achieve.

For more information on how we use web beacons in our e-newsletter emails, see our cookies policy which is available here: <https://thecareerfarm.com/cookies-policy/>

For more information about our third party mailing list providers and how they use web beacons, please see their privacy policies which are available here:

<https://www.aweber.com/privacy.htm>

<https://mailchimp.com/legal/privacy/>

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.





Information received from third parties

Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include universities or business schools (if you are a student at the institution) and employers (if you are an employee of the company). In these cases, the third party connected to you will have contracted with us to provide goods or services to you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as business directories, media publications, social media, and websites (including your own website if you have one).

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources.

Our use of automated decision-making and profiling

Automated decision making is decision making by technological means (i.e. by a machine) without human involvement.

[Use of automated decision making for display advertising](#)





We automate the display advertisements containing our products and services on other websites you visit, based on the fact that you have visited parts of our website which we have recorded using cookies. For further information on the cookies we use, please see our cookies policy which is available here: <https://thecareerfarm.com/cookies-policy/>

Logic involved: automatically displaying advertisements to individuals who have visited certain pages of our website results in increased efficiencies and costs savings for us than manually displaying advertisements or displaying advertisements by different means. It also means we can improve our users' experience as we are only likely to show advertisements to those people most likely to be interested in them (for example we may show adverts relevant to recruiters to those people who have visited the recruiting blogs area of our website)

Significance and envisaged consequences: cookies will be used to recognise the fact that you have visited our website in order to display advertisements to you (unless you have blocked such cookies) and will collect information about your online behaviour.

How to object: you can block these cookies by changing your browser settings or by using tools that block cookies or by visiting our site using the "incognito" browser mode. For further information, please see our cookies policy: <https://thecareerfarm.com/cookies-policy/>

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where a user's previous behaviour on our website or in interactions with our company demonstrates a potential interest in our services, we have a legitimate interest in advertising our services to them – and in trying not to advertise our services to a broader audience, many of whom would have no interest in our services.

Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics

Our web analytics service, Google Analytics, collects information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on). Information collected about you, once collected, is anonymised and stored on an aggregate basis.

Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

Significance and envisaged consequences: cookies will be used to track and store information about your behaviour and device on our website (unless you have opted out from receiving such cookies by adjusting your browser settings or using cookie blocking technologies) and your location will be analysed based on your IP address (we may target advertisements based on the level of interest we receive from certain visitors and their behaviour on our website).

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).





Legitimate interest: where a user's previous behaviour on our website or in interactions with our company demonstrates a potential interest in our services, we have a legitimate interest in advertising our services to them – and in trying not to advertise our services to a broader audience, many of whom would have no interest in our services.

Use of profiling in marketing emails

We may use web beacons in our marketing emails to analyse who opens our emails and what actions they take (for example, what they click on). We will only process information from if you have consented to their use in accordance with our cookies policy (<https://thecareerfarm.com/cookies-policy/>).

Logic involved: by analysing how our email recipients respond to our emails, we are able to improve the content and effectiveness of our emails and gauge who is most interested.

Significance and envisaged consequences: your behaviour when you open our emails may be tracked using small gif files (web beacons), including open rates and click through rates.

How to object: you can object to our use of web beacons at any time by contacting us at support@thecareerfarm.com

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: analysing the level of engagement and effectiveness of our marketing emails and content, and improving the relevant of the content we provide to you.

Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who may process your information for us on our behalf. These would include telephone providers, email providers, web developers, website hosting company, webinar platforms, payment providers and accounting and legal firms.

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website, ordering goods and services from us or subsequently providing goods and services ordered from us.

We do not display the identities of all of our service providers publicly by name for security, agility and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly via our contact form and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.





Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc. Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so.

These third parties include our Accountants and Business Advisors.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest: running and managing our business efficiently.

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.





Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement of our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.





How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for 6 months, as determined by our third party hosting company. After 6 months server logs are deleted.

Order information: when you place an order for goods and services, we retain that information for six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, we will retain your information for as long as it takes to respond to and resolve your enquiry – and may keep your information for a longer duration if needed for the fulfilment of a contractual obligation or if you are considering entering into a contract with us for our services.

Google Analytics: data collected by Google Analytics is retained for 26 months before being automatically deleted.

E-Newsletter: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier.

Online courses: where you sign up to one of our online “Maximiser” training courses we will retain your data for 6 months after the end of your subscription period, then we will delete it. We retain the data for this additional period in case you want to re-activate your subscription.

Subscription periods are:

- 36 months, if your university or business school purchases access to the course on your behalf to support you during your course
- 12 months in all other circumstances (unless we specifically agree a different subscription period)

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;





- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using payment providers with Secure Sockets Layer (SSL) software to encrypt any payment transactions you make for services listed on our website

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area (EEA)

Your information may be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.





Server log information

Information collected when you visit our website is stored on the servers of our third party hosting provider within the EEA. Our third party hosting provider is Siteground Hosting Limited, and you can access their privacy policy here: <https://www.siteground.com/privacy.htm>

Contact form

Messages you send us via our contact forms will be stored within the European Economic Area on our email provider's servers. Our third party email provider is Gmail, their privacy policy is available here: <https://policies.google.com/privacy>

Information you provide to us via webinar signup forms will be stored inside the European Economic area on the servers of our third party Webinar provider, GotoWebinar, and also on our internal servers, provided by the data hosting company Dropbox. Their privacy policies can be found at:
<https://www.dropbox.com/privacy2018>
<https://www.logmeininc.com/legal/privacy>

All of these third party providers make provision for your information to be transferred outside of the European Economic Area as part up of their backup and resilience procedures.

Country of storage: should your data be transferred out of the EEA, it will be transferred to the USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: All of these third party providers are separately certified under the EU-US and Swiss-US Privacy Shield. This is an approved certification mechanism under Article 42 of the General Data Protection Regulation. This is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can obtain more details on the EU-U.S. Privacy Shield at: <https://www.privacyshield.gov/welcome> and the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Email

Emails you send to us will be stored within the European Economic Area on our email provider's servers. Our third party email provider is Gmail, their privacy policy is available here: <https://policies.google.com/privacy>

Gmail (Google) makes provision for your information to be transferred outside of the European Economic Area as part up of their backup and resilience procedures.

Country of storage: should your data be transferred out of the EEA, it will be transferred to the USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Gmail (Google) is certified under the EU-US and Swiss-US Privacy Shield. This is an approved certification mechanism under Article 42 of the General Data Protection Regulation. This is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can obtain more details on the EU-U.S. Privacy Shield at: <https://www.privacyshield.gov/welcome> and the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm





E-Newsletters

Information you submit to us when you sign up for one of our e-newsletters may be transferred outside the EEA and stored on our third party mailing list provider's servers. Our third party mailing list providers are Aweber or Mailchimp. Their privacy policies are available here:

<https://www.aweber.com/privacy.htm>

<https://mailchimp.com/legal/privacy/>

Country of storage: should your data be transferred out of the EEA, it will be transferred to the USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Both Aweber and Mailchimp are certified under the EU-US Privacy Shield. This is an approved certification mechanism under Article 42 of the General Data Protection Regulation. This is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can obtain more details on the EU-U.S. Privacy Shield at: <https://www.privacyshield.gov/welcome> and the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here:

http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Google Analytics

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google's servers. You can access Google's privacy policy here: <https://www.google.com/policies/privacy/>

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Personal data submitted via our online courses

Information you input into the exercises associated with our online "Maximiser" courses is stored on the servers of our third party hosting provider within the EEA, and backed up to the servers of our third party secure backup provider, also within the EEA.

Our third party hosting provider is Siteground Hosting Limited, and you can access their privacy policy here: <https://www.siteground.com/privacy.htm>

Our third party secure backup provider is Amazon Web Services, and you can access their privacy policy here: <https://aws.amazon.com/compliance/data-privacy-faq/>





Other services we use to facilitate the provision of our goods and services

We use the following third party services to facilitate the provision of our goods and services:

- Woocommerce
- Zapier
- Paypal
- Leadpages

Data submitted to these third parties may be transferred out of the EEA.

Country of storage: should your data be transferred out of the EEA, it will be transferred to the USA (Zapier & Leadpages) or to the USA and other countries (Paypal and Woocommerce). The USA is not subject to an adequacy decision by the European Commission.

Safeguard(s) used:

Paypal safeguards your data through a series of Binding Corporate Rules approved by competent Supervisory Authorities. Further details are available here: <https://www.paypal.com/uk/webapps/mpp/ua/bcr>

Leadpages safeguards your data through the use of Standard Contractual Contracts approved by the EU. Further details are available here: <https://www.leadpages.net/privacy>

Woocommerce and Zapier are both self certified under the EU-US Privacy Shield. Further details can be found here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to The Career Farm Limited, Harrogate Business Centre, Hookstone Avenue, Harrogate, HG2 8ER, UK:

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.





In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here:

http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to The Career Farm Limited, Harrogate Business Centre, Hookstone Avenue, Harrogate, HG2 8ER, UK:





- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including ‘profiling’ (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link; or
- **sending an email** to info@thecareerfarm.com asking that we stop sending you marketing communications or by including the words “OPT OUT”.

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled [How to accept or reject cookies](#) in our cookies policy, which is available here: <https://thecareerfarm.com/cookies-policy/>

Sensitive Personal Information

‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.





We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to info@thecareerfarm.com

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal. For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here: <https://thecareerfarm.com/cookies-policy/>

Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

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