Privacy and cookies

Oppia Ltd. is committed to safeguarding and preserving the privacy of our users and website visitors. This privacy policy explains what happens to any personal data that you provide to us or that we collect from you, and how we use cookies on SimplyCPD.

What this policy takes into account

Our privacy policy takes into account:

- the General Data Protection Regulation 2016
- the <u>Privacy and Electronic Communications (EC Directive) Regulations</u>
 2003 as amended by <u>The Privacy and Electronic Communications (EC Directive)</u> (Amendment) Regulations 2011
- <u>Directive 2009/136/EC of 25 November 2009</u> ("The European Union Cookie Directive").

Information that we collect

We may collect and process the following data about you:

- Information about your use of our platform SimplyCPD including details
 of your visits such as pages viewed and the resources that you access.
 Such information includes traffic data, location data and other
 communication data.
- Information provided voluntarily by you. For example, when you register your information, add free text content, and provide personal details.
- Information that you provide when you communicate with us by any means.

Use of your information

What we do with your data

All personal information held by Oppia Ltd. will be held in accordance with the General Data Protection Regulation 2016.

Oppia Ltd. through its platform SimplyCPD collects data during download and/or registration; through subscription to activities, resources, services, and training; and through partnership activities, resources, services and training.

Why we need to collect and use your data

Oppia Ltd. obtains and maintains information about registered users and affiliate sites in order to provide access to educational content, to improve the platform, and for use in research services. Information is also retained for monitoring training, research and statistical analysis, to verify qualifications, and to prevent fraudulent activity.

Oppia Ltd. uses generic information about registered users for promotional activities, fundraising, research, and to further develop the SimplyCPD platform.

Oppia Ltd. commits to using your information in accordance with your stated preferences. Please contact support@simplycpd.co.uk or log in to your SimplyCPD account on the app or website to amend your profile/settings/preferences.

Who we share your data with outside

Oppia Ltd. shares information internally between departments to improve our communications and services; and with appropriate third parties* in order to improve engagement with CPD, medical training and clinical practice. Oppia Ltd. will not sell information about registered users to third parties.

*Non-exclusive list: Department of Health, NHS England (and other regional divisions of the NHS within the UK), the General Medical Council, Health Education England (and other regional representations within the UK), Educational and other training programmes in the NHS; postgraduate deaneries and overseas equivalents, Universities with whom we may be conducting research for the purposes of developing the product.

In general, the level of data shared will reflect the need of the recipient, and where possible and appropriate, data will be shared in a generic form rather than personally-identifying format. There may be occasions when the latter is necessary for the continued use of, development of, or appraisal of SimplyCPD, and in such case we will share only that which is necessary, and for the purpose for which it is necessary.

Oppia Ltd. may disclose personal details to appropriate suppliers, in order for registered users to take advantage of any discounts on products and services offered by organisations from whom we believe registered users may benefit.

How we protect your data outside the territories covered by the GDPR

Simply CPD is only available to UK registered users. If data is, or must for any reason be shared outside the EU it will be under written agreements that are consistent with GDPR regulations and requirements.

How long we keep your data and why

Oppia Ltd. collects and holds data on registered users for the duration of registered use, and for a period of time afterwards that is deemed necessary for data harvesting, in order that service use may be monitored and developed.

Where we got your data from, if not you

Oppia Ltd. collects and holds data on registered users directly, and may occasionally receive such information from other data sources and third party organisations. In such cases Oppia Ltd will hold and process your data in keeping with this privacy policy.

Your rights

You have the right to access all information which identifies you as a living person, held on Oppia Ltd's database. You have the right to a copy of your data in a standard format, where technically possible. You also have the right to rectify factual errors in the data we hold about you. The above rights apply across all work areas within Oppia Ltd's offerings. You have the right to restrict processing, stop your data being processed or have your data deleted shuld you wish to de-register from SimplyCPD and stop using the platform. If you wish to exercise these rights, contact us on support@simplycpd.co.uk.

Where we use automated decision making and how this affects you

Oppia Ltd. does not use automated decision making.

Who makes the decisions about using your data, if not Oppia Ltd.

Oppia Ltd. holds your data except in circumstances where disclosure of that information is either necessary by law, or for the purposes outlined above, in which case any partner organisation with whom data is shared is bound by their own policies as governed by the laws and regulations outlined above.

Who to contact at Oppia Ltd. and how to complain

If you wish to know more about how we manage privacy at Oppia Ltd, or you wish to make a complaint, contact support@simplyCPD.co.uk.

The UK regulator for privacy law is the <u>Information Commissioner's Office (ICO)</u>. See their website for further information on your rights.

If the use of your data changes, we will place an updated version on this page. Regularly reviewing this information ensures you are always aware of what data we collect, how we use it and under what circumstances, we will share it with other parties.

Security

No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, Oppia Ltd. cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we make our best effort to try to ensure its security both internally and while in transit between our systems and the companies who provide us with various services.

Use of cookies

Cookies provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information about your computer in order to assist us in improving SimplyCPD.

We may gather information about your general internet use by using cookies. Where used, these cookies are downloaded to your computer and stored on your computer's hard drive. Such information will not identify you personally; it is statistical data and not personally identifying data.

You can adjust the settings on your computer to decline any cookies if you wish. This can be done within the 'settings' section of your computer. For more information please read the advice at AboutCookies.org.

Demographics

Our server records your visit for demographic reasons and to help us understand how you use the site. We use the information we collect to improve the site and provide better services. The information we collect is treated in accordance with the data protection principles outlined in the Data Protection Act 1998, updated in the General Data Protection Regulation 2016.

Changes

We may make changes to this statement from time to time. If we change our privacy policy we will post the changes on this page. The amended privacy and cookies policy will apply from the date it is posted on our site and will govern the way in which we collect and use personal information from the date of the change.

This statement was last updated November 2018.