Alcedo Conservation Ltd.
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PRIVACY POLICY

POLICY VERSION: 13/01/2024

1 INTRODUCTION

This Privacy Policy is provided by Alcedo Conservation Ltd, a company registered in England and Wales under company number: 14370493 with registered office Thomas & Ellis, 31 Silver Street, Wiltshire, Bradford On Avon, England, BA15 1JX ('**we**', '**our**' or '**us**') and is operating the website https://alcedoconservation.com (**Website**).

We provide training and coaching in conservation (**Services**). For more information, see the About page.

We are responsible for any personal data we collect when you use, access or otherwise interact with our Website or use our Services.

As such, we collect and use the personal data of four categories of data subjects:

1. Visitors to our Website;
2. Our clients;
3. Employees and authorised representatives of clients where applicable; and
4. Our training participants.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (your **personal data**).

It also explains your rights in relation to your personal data and how to contact us or the relevant regulator in the event you have a complaint. Our collection, storage, use and sharing of your personal data is regulated by law, including under the UK General Data Protection Regulation (**UK GDPR**).

We are the controller of personal data obtained via the Website and Services, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

Our Website is not intended for use by children, and we do not knowingly collect data relating to children. If you are under the age of 18, you must not use our Website.

2 WHAT THIS POLICY APPLIES TO

This privacy policy relates to your use of the Website and Services only.

The Website and Services may link to or rely on other apps, websites, APIs, or services owned and operated by us or by certain trusted third parties to enable us to provide you with Services. These other apps, websites, APIs, or services may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other apps, websites, or services, please consult their privacy policies as appropriate. For more information see the section '**Who we share your personal data with**' below.

3 PERSONAL DATA WE COLLECT ABOUT YOU

The personal data we collect about you depends on the particular activities carried out through the Services and Website. We will collect and use the following personal data about you:

If you are a client, or employee or authorised representative of a client:

Category of data	In more detail
Data collected when you sign up to a Services Agreement with us	• Your name and email address • Your company/organisation name • Phone number • Your job title at the company/organisation • Your country of residence • Your banking details
Data collected if you submit an enquiry to us	• Your name and email address • Your company/organisation name • Phone number • Your job title at the company/organisation • Your country of residence
Details of any information, feedback, or other matters you give us by phone, email, post, or via social media	• Your feedback on the Services • Your opinion about the Services • Any information you provide to us
Data collected when you use specific functions on the Website	Data you store online with us using the Website including your usage history or preferences (while such data may not always be personal data as defined at law in all cases, we will assume it is and treat it in accordance with this policy as if it were).
Other data the Website collects automatically when you use it	Your activities on, and use of, the Website which reveal your preferences, interests, or manner of use of the Website and the times of use.

If you are a training participant:

Category of data	In more detail
Data collected when you register/apply for a course Registration is mandatory in order access the course	• Your name and email address • Your company/organisation name • Your job title at the company/organisation • Your account details, such as username and password • Your country of residence • Your credit card and banking details
Data that may be collected when you register/apply for a course	• Your DOB • Your location (e.g. region) • Your proficiency in English • Justification for why you are applying for a scholarship • Brief biography of yourself
Data collected when you submit any enquiry to us	• Your name and email address • Your company/organisation name • Your job title at the company/organisation • Your country of residence

Category of data	In more detail
Details of any information, feedback, or other matters you give us by phone, email, post or via social media	• Your feedback on the Services • Your opinion about the Services • Any information you provide to us
Data collected when you use specific functions on the Website	Data you store online with us using the Services including your usage history or preferences (while such data may not always be personal data as defined at law in all cases, we will assume it is and treat it in accordance with this policy as if it were)
Other data the Website collects automatically when you use it	Your activities on, and use of, the Services which reveal your preferences, interests, or manner of use of the Services and the times of use.

If you are a visitor to the website:

Category of data	In more detail
Data collected when you visit the Website	• IP address, login data, browser type and version, operating system and platform, and device data. • usage data on how you use our Website, and services; and • your preferences in receiving marketing from us.

If you do not provide personal data we ask for where it is required, it may prevent us from providing services, the Website and/or the Services to you.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

4 SENSITIVE DATA

Certain personal data we collect is treated as a 'special category' to which additional protections apply under data protection law. This is also known as 'Sensitive Data', and means information related to personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); data concerning health; data concerning a person's sex life; and data concerning a person's sexual orientation. Where we process such Sensitive Data, we will also ensure we are permitted to do so under data protection laws, and any such data will be collected on the basis of your consent. Sensitive Data we collect about you, where you choose to give it to us, may include:

- your pronouns

We collect and use this Personal Data for the purposes described in the section '**How and why we use your Personal Data**' below.

5 HOW YOUR PERSONAL DATA IS COLLECTED

We collect personal data from you directly when you sign up to the Services, contact us directly or reach out to us via social media, or indirectly, such as your activity while using the Services.

At this point in time, we do not collect any personal information about you using cookies or similar technologies. In the event that this were to change and if we were to decide to collect personal data about you using cookies, you would be notified of this change by means of in-app notification, with detailed information regarding our use of cookies and similar technologies to be made available in the relevant cookies policy.

6 HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

(i) where you have given consent

(ii) to comply with our legal and regulatory obligations

(iii) for the performance of a contract with you or to take steps at your request before entering into a contract, or

(iv) for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Create and manage your account with us	To perform our contract with you or to take steps at your request before entering into a contract
Providing services and/or the functionalities of the Services to you, including contacting you about an enquiry you have made.	To perform our contract with you or to take steps at your request before entering into a contract (in this case, the contract means the Terms and Conditions of Use which apply to the Services)
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests or those of a third party, i.e., to protect our business, interests and rights or those of others
Communications with you not related to marketing, including about changes to our terms or policies or changes to the Services or service or other important notices	Depending on the circumstances: • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests or those of a third party, i.e., to provide the best service to you
Protect the security of systems and data	To comply with our legal and regulatory obligations we may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests or those of a third party, i.e., to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Operational reasons, such as improving efficiency, training, and quality control or to provide support to you	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service to you
Statistical analysis to help us manage our business, e.g., in relation to our performance, customer base, app and functionalities and offerings or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service to you and improve and develop our Services and website

What we use your personal data for	Our reasons
Updating and enhancing user records	Depending on the circumstances: • to perform our contract with you or to take steps at your request before entering into a contract • to comply with our legal and regulatory obligations • where neither of the above apply, for our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about their accounts and new products or functionalities related to the Services and our services
To comply with our legal and regulatory obligations	Depending on the circumstances: • to perform our contract with you or to take steps at your request before entering into a contract • to comply with our legal and regulatory obligations • where neither of the above apply, for our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about their accounts and new products or functionalities related to the Services and our services
To share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests or those of a third party, i.e., to protect, realise or grow the value in our business and assets

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

7 MARKETING

We intend to email marketing to inform you of our services such as promotions.

We will always ask you for your consent before sending you marketing communications, except where you have explicitly opted-in to receiving email marketing from us in the past or except where you were given the option to opt-out of email marketing when you initially signed up for your account with us and you did not do so.

You will have the right to opt out of receiving marketing communications at any time by:

- contacting us using the details provided at the start of this policy or see '**How to contact us**' below
- using the 'unsubscribe' link included in all marketing emails you may receive from us

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

8 WHO WE SHARE YOUR PERSONAL DATA WITH

Where you have signed up to the Services, we may share your personal data with third party contractors and consultants in order to perform the Services.

We routinely share personal data with service providers we use to help us run our business or provide the services or functionalities in the Services or Website, including developers and cloud storage providers.

We only allow service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above may occasionally also need to share your personal data with:

- external auditors, e.g. in relation to the audit of our accounts and our company —the recipient of the information will be bound by confidentiality obligations
- professional advisors (such as lawyers and other advisors)—the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts or tribunals and regulatory bodies to comply with legal and regulatory obligations
- other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

We will not share your personal data with any other third party.

9 HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will keep your personal data for as long as you have an active account with us and for a period of up to 6 years thereafter to comply with any accounting or legal obligations including in the event of the pursuit or defence of legal claims. Once you have closed your account with us, we will move your personal data to a separate database so that only key stakeholders in our business on a "need to know basis" have access to such data.

Following the end of the of the aforementioned retention period, we will delete or anonymise your personal data.

10 TRANSFERRING YOUR PERSONAL DATA OUT OF THE UK

We may transfer your personal data outside the United Kingdom (**UK**) and European Economic Area (**EEA**). Where we transfer your personal data outside of the UK and the EEA, we will only do so for the purposes mentioned in this Policy and any contract that we have entered into with you or the entity that you are representing.

Countries outside of the UK and the EEA do not have the same data protection laws as the UK and EEA. Therefore, when making such a transfer of data, we will always rely on a safeguard mechanism under the UK GDPR and/or the EU GDPR. We will only transfer your personal data to a country which the European Commission or the UK authorities have given a formal adequacy decision/regulation that confirms this third-country provides an adequate level of data protection similar to those which apply in the UK and EEA. If the third-country does not have an adequacy decision awarded to it, any transfer of your personal information will be subject to entering into the UK's International Data Transfer Agreement (**IDTA**) which is designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

Transfers of personal data from the UK to the EEA shall be done on the basis of the adequacy regulation awarded to the European Union by the UK pursuant to the withdrawal of the UK from the European Union which was granted in June 2021.

If you would like further information please **contact us** (see '**How to contact us**' below)**.** We will not otherwise transfer your personal data outside of the UK and the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

11 YOUR RIGHTS

You generally have the following rights, which you can usually exercise free of charge. For more information regarding these rights, please visit the ICO website here.

Access to a copy of your personal data	The right to be provided with a copy of your personal data.
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data.
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations.
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations.
To object to use	The right to object: • at any time to your personal data being used for direct marketing (including profiling) • in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests.
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you We do not make any such decisions based on data collected by the Services.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below). You may also find it helpful to refer to the guidance from the UK's Information Commissioner on your rights under the UK GDPR.

If you would like to exercise any of those rights, please complete a request form—available on our website at [insert link] or email, call, or write to us—see below: '**How to contact us**'. When contacting us please:

- provide enough information to identify yourself (e.g., your full name and username) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

12 KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

13 HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your information (see below '**How to contact us'**). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner.

The Information Commissioner can be contacted at https://ico.org.uk/make-a-complaint or telephone: 0303 123 1113.

14 CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy from time to time. When we make significant changes, we will take steps to inform you, for example via the Services or by other means, such as email.

15 HOW TO CONTACT US

You can contact us by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law, or to make a complaint.

Our contact details are shown below:

- Address: Alcedo Conservation Ltd, Thomas & Ellis, 31 Silver Street, Wiltshire, Bradford On Avon, England, BA15 1JX
- Email address: catherine@alcedoconservation.com