

PRIVACY POLICY

We are committed to protecting the privacy of your personal data. We will respect any personal data you share with us and keep it safe. We will be clear when we collect your personal data and not do anything you wouldn't reasonably expect.

Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will collect, use and store it. We may update this Privacy Policy from time to time so please check it regularly. If there are significant updates, we will notify you.

Who are we?

We are myAko Limited, a company registered in England and Wales under registration number 11309590 and registered at 31/33 Commercial Road, Poole, Dorset, BH14 0HU (**myAko**).

Use of your personal information

myAko collects and uses your personal information to operate the following websites to deliver the services you have requested, including capturing your personally identifiable information to:

- Process learning data for our Clients and their employees:
<https://www.myako.com> and <https://www.myako.online>
- We are joint processors for consoles and websites built by our trusted partners Omnia Smart Technologies (Registration No: 08783140)
- Process data for Sales & Marketing purposes and to keep you informed of other products and services available from myAko and its affiliates.

- myAko may also contact you via surveys, e-mails and telemarketing to conduct research about your opinion of current services or of potential new services that may be offered. To undertake these tasks we store your details on Salesforce: <https://www.salesforce.com>

myAko does not sell, rent or lease its client lists to third parties. myAko may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (email, name, address, telephone number) is not transferred to the third party. In addition, myAko may share data with trusted partners to help us perform statistical analysis, send you email or postal mail and provide customer support.

All such third parties are prohibited from using your personal information except to provide these services to myAko, and they are required to maintain the confidentiality of your information.

myAko keeps track of the websites and pages our clients visit within <https://www.myako.com> and <https://www.myako.online>, to determine what learning products and services are the most popular and continuously improve our client experience. This data is used to deliver customised content and advertising within <https://www.myako.com> and <https://www.myako.online> to clients whose behaviour indicates that they are interested in a particular subject area.

myAko will disclose your personal information, without notice, only if required to do so by law or in good faith that such action is necessary to:

(a) conform to the edicts of the law or comply with legal process served on myAko or the site;

(b) protect and defend the rights or property of myAko; and,

(c) act under exigent circumstances to protect the personal safety of users of <https://www.myako.com> and <https://www.myako.online> or the public.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details which is held third party payment gateway suppliers for the purpose of taking payments from you.
- **Transaction Data** includes details about payments made to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in August 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Use of cookies

The <https://www.myako.com> and <https://www.myako.online> website use “cookies” to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programmes or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

The purpose of a cookie is to tell the web server that you have returned to a specific page. This simplifies the process of recording your personal information, such as billing addresses, and so on. When you return to the same website, the information you previously provided can be retrieved, so you can easily use

<https://www.myako.com> and <https://www.myako.online>

Most browsers are set to automatically accept cookies by default, but you can change this setting. For instructions on how to find and accept/reject cookies for your browser, please read your browser's help information.

We may also use cookies on this website to create targeted campaigns on social media.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at hello@myako.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

Where we store your personal information

The data that we collect from you will not be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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

your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Newsletter sign up

As part of the registration process for our monthly eNewsletter, we collect personal information. We use that information for the following reasons: to tell you about information you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third party provider, MailChimp, to deliver our eNewsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our eNewsletter. For more information, please see:

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

You can unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of our emails.

Links to other web sites

This privacy notice does not cover the links within this site linking to other websites. Those sites are not governed by this Privacy Policy and if you have questions about how a site uses your information, you'll need to check that site's privacy statement.

Security of your personal information cyber essentials?

myAko secures your personal information from unauthorised access, use or disclosure. myAko secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. When personal information (such as a credit card number)

is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

What lawful bases do we rely on to use your personal data?

The lawful bases that we rely on for processing your personal data are:

- You or your employer have provided your consent to us using your personal data for a specific purpose.
- We will ask for your consent to use your personal data to send you electronic communications such as newsletters and emails.
- You have the right to withdraw your consent at any time.
- It is necessary in connection with the performance of a contract with your employer.
- It is necessary for compliance with a legal obligation to which we are subject; this would include where we have to retain certain records, for example your training records for compliance purposes. Or where we are required to disclose personal data to any regulators or law enforcement agencies.
- It is within our legitimate interests.

Legitimate interests

Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (as long as the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights.

We will also rely on our legitimate interests for the proper administration of <https://www.myako.com> and <https://www.myako.online> and to manage our operations (for example, maintaining appropriate records and databases).

When we process your personal data to achieve such legitimate interests, we consider the balance any potential impact on you and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless we are otherwise required or permitted to by law). A balance test will be completed and recorded.

Sensitive or special category data

We do not collect sensitive data from you (i.e. data on health, ethnicity, race, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, sex life or sexual orientation).

If we have to collect sensitive data, we will ensure that we obtain your prior explicit consent. You have the right to withhold your consent.

Communications and marketing

We may contact you by post and, where you have provided consent, also by telephone and email, to let you know about events and activities that might be of particular interest to you or about the work of myAko more generally. We provide the opportunity for you to opt-out from receiving our marketing communications every time we contact you.

You can opt-out from receiving our marketing communications or update your contact preferences by emailing: hello@myako.com and <https://www.myako.online>

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Your rights

Right to restrict processing. In certain circumstances, you have a right to require us to stop processing your personal data in a particular way.

Right to erasure. You have the right to request that your personal data is erased from our database in certain circumstances.

Right of access. You have a right to ask for a copy of the personal data we hold about you. If you want to access your personal data, please send a description of the personal data you want to see and proof of your identity to hello@myako.com and <https://www.myako.online>. This is free of charge.

Right to rectification. We want to make sure that your personal data is accurate and up to date. Please let us know if your details change. You may also ask us to correct or remove personal data which is inaccurate.

Right to object. You can opt-out of receiving all or some of our marketing communications or request that we stop processing personal data about you for certain purposes at any time by contacting us at hello@myako.com and <https://www.myako.online>

Right to data portability. In certain circumstances, you have a right to data portability which means we will provide you (or a third party you nominate) with your personal data in a structured, commonly used and machine-readable format.

Please note that you may only use and benefit from some of these rights in limited circumstances. For more information, we suggest that you consult guidance from the Information Commissioner's Office (ICO) or please contact us using the details <https://ico.org.uk>

If you wish to exercise any of the rights set out above, please email us at hello@myako.com and <https://www.myako.online>

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Data retention

We keep personal data for as long as there is a need to keep it in connection with the purposes for which it was collected and in accordance with our Data Retention Policy. In the event that you ask us to stop sending you marketing communications, we will retain certain details, such as your name, to help us ensure that you are not contacted again.

Changes to this Statement

myAko will occasionally update this Statement of Privacy to reflect company and customer feedback. myAko encourages you to periodically review this Statement.

Contact Information

myAko welcomes your comments regarding this Statement of Privacy. If you believe that myAko has not adhered to this Statement, please contact Kevin Ashley on hello@myako.com and <https://www.myako.online> who will escalate this matter. We will use commercially reasonable efforts to promptly determine and remedy the problem.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.