

PRIVACY POLICY

We are Cambridge Spark Limited registered in England with company number 10333201. We are focused on teaching the latest tools and techniques in data science and software development to equip individuals with the most relevant skills for industry needs.

Our registered office address is: Salisbury House, Station Road, Cambridge, England, CB1 2LA.

You can contact us by email via contact@cambridgespark.com and by phone on +44 (0) 7816 419378.

Our Information Commissioner's Office (ICO) registration reference is ZA242406.

We are committed to:

- protecting your personal data,
- being transparent about our collection and use of your personal data, and
- respecting your privacy.

Personal data is any information that identifies an individual or can be used to help identify an individual; for example, a name, email address, IP address or location data.

We do our very best to keep your personal data secure.

This policy explains the following with respect to your personal data:

- what information we collect from you and how we collect it,
- why we collect it and our legal basis for doing so,
- how we use it,
- who we share it with,
- where we store it,
- how long we keep it for, and
- your rights.

References to the "GDPR" are to the General Data Protection Regulation (**GDPR**) (EU) 2016/679.

Our Privacy Officer is Raoul-Gabriel Urma who can be contacted via raoul@cambridgespark.com.

WHAT PERSONAL DATA DO WE COLLECT AND HOW DO WE COLLECT IT?

We only ever collect the personal data that we need from you to be able to offer a tailored service for your internships, work placements and job-hunting needs, and to be able to offer you our full range of training courses and bootcamps. We keep the personal data we hold on an ongoing basis to a minimum.

We collect and process your personal data when you use our site, products and services. This may be personal data you provide to us, that we collect about you and/or information we receive from other sources.

Information you give us

The personal data you give us, through registering as a user, by posting material to our website (e.g. your CV), or by corresponding with us by phone, email, or otherwise, may include your:

- name,
- address,
- e-mail address,
- phone number,

- financial and credit card information,
- personal description,
- nationality,
- details of your education,
- details of your career,
- interests in the topics we cover and products that we provide, and
- photograph.

We would ask you to ensure that the personal data you provide to us is kept up-to-date and therefore please contact us if you need to amend any of your personal data.

Information we collect about you

Each time you visit our site we automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); information, products and services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Information we receive from other sources

We use approved third parties to provide services to us (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT IS OUR LEGAL BASIS FOR DOING SO?

We collect your personal data either to:

- provide you with information, a product or a service in response to your request,
- provide you with a more personalised service when you visit our site, or
- improve our services to you.

The legal basis that we rely on to enable us to collect and use your personal data for the purposes stated is either:

- the performance of a contract between us (**contract**),
- compliance with a legal obligation (**legal obligation**),
- our legitimate organisational interests where there is no overriding prejudice to you (**legitimate interests**), or
- you have given your consent (**consent**).

In the section below “How do we use your Personal Data?” we provide more detail on the legal basis relied on in each case.

HOW DO WE USE YOUR PERSONAL DATA?

We use information that we hold about you in the following ways:

- to provide you with information about our products and services that you request from us (**contract**),
- to provide you with information, products and services that you have requested and to invoice you or your employer (**contract**),
- to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about (**legitimate interests** on the basis that this would not be unexpected contact from us as you have purchased a product or service already from us, attended an event or made an enquiry),
- to notify you about changes to our products and services (**legitimate interests** on the basis that this would be useful information for you to receive as a current or former customer),
- to ensure that content from our site is presented in the most effective manner for you and for your computer (**legitimate interests** in that we have a business interest in presenting our content in the most effective manner),
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes (**legitimate interests** in that we need to carry out regular maintenance and testing on our site),
- as part of our efforts to keep our site safe and secure (**legitimate interests** for us to maximise safety and security for both parties),
- to enable us to use cookies as detailed in our Cookies Policy (**consent**), and
- to provide you with newsletters and tutorial packs in response to your request (**consent**).

(For details of how to withdraw your consent at any time please see the section “Your Rights” below.)

Information we receive from other sources

In certain circumstances, we combine information we receive from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We share your information with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you,
- analytics and search engine providers that assist us in the improvement and optimisation of our site, and
- prospective employers where you have uploaded your CV to our website.

Our selected third parties are required by us to treat your personal data as carefully as we would and may only act on our instructions with regard to their use of your personal data.

Where you have attended one of our courses paid for by your employer we will also share with your employer (as stated in our Course Terms and Conditions) details of your attendance, marks, exam results, general progress reports and any other information reasonably requested by your employer.

Where you attend one of our Applied Data Science courses then we will share your information with our industry partner who is providing the project that you will participate in.

We may disclose your personal information to third parties in the event that:

- we sell or buy any business or assets, in which case we will be obliged to disclose your personal data to the prospective seller or buyer of such business or assets,

- if Cambridge Spark Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets, or
- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, our safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will never sell your personal data and will never share it with a company for marketing purposes.

WHERE DO WE STORE YOUR PERSONAL DATA?

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). Such destinations may include countries where the level of protection provided for your personal data is not considered adequate by the European Union authorities. However, in such situations, we ensure that we put in place adequate safeguards to protect your personal data. Your personal data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

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 your 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.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

YOUR RIGHTS

You have the following rights in connection with your personal data:

- where we are processing your personal data on the basis of consent then you have the right to withdraw your consent at any time by contacting us by email via contact@cambridgespark.com, and
- the right to obtain a copy of your personal data which we hold about you.

In certain circumstances you have the right to:

- have your personal data erased,
- restrict processing of your personal data,
- object to the processing of your personal data, or

- have your personal data transferred to a third party.

If you wish to exercise your rights, please contact our Privacy Officer by email via raoul@cambridgespark.com with “PRIVACY” in the subject of the email.

If you have an issue or complaint arising under this policy then, in the first instance, please contact our Privacy Officer by email via raoul@cambridgespark.com with “PRIVACY” in the subject of the email.

If you are not satisfied with our handling of your issue or complaint then you have the right, under Article 77 of the GDPR, to lodge a complaint with the Information Commissioner’s Office (<https://ico.org.uk/concerns/>).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. **Please check these policies before you submit any personal data to these websites.**

CHANGES TO OUR PRIVACY POLICY

Notification of any changes we may make to our privacy policy in the future will be posted on this page and on our website.

GOVERNING LAW AND JURISDICTION

If you are a consumer, please note that this privacy policy, its subject matter and its formation, are governed by English law. You and we both agree that the courts of England and Wales will have non-exclusive jurisdiction. However, if you are a resident of Northern Ireland you may also bring proceedings in Northern Ireland, and if you are resident of Scotland, you may also bring proceedings in Scotland.

If you are a business, this privacy policy, its subject matter and its formation (and any non-contractual disputes or claims) are governed by English law. We both agree to the exclusive jurisdiction of the courts of England.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Raoul-Gabriel Urma, our Privacy Officer, by email via raoul@cambridgespark.com with “PRIVACY” in the subject of the email.