

## Global Privacy Policy

This privacy notice sets out how Steps uses and protects any information that you give us when you use Steps' website (for example when you register as a user, browse, fill in a form) or when you provide information directly to Steps by any other means.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy notice.

We process your personal data for our legitimate business interests for operating our business and to fulfil contractual obligations with our clients. We may also process your data to comply with legal obligations we have with HMRC and other government bodies. For all other processing we will obtain your consent before using any of your personal data.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 23rd May 2018.

### What we collect

We may collect the following information:

- Name and job title.
- Contact information including email address.
- Demographic information such as postcode, preferences and interests.
- Information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters.
- Associates/Business personal information such as name, contact details, work history, education/training and skills.
- Other information relevant to customer surveys and/or offers.

### What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Ensure accurate internal record keeping.
- Provide you with services that you have requested from us and to perform our legal obligations to you.
- Perform and administer the contract we enter into with you, in accordance with our Terms and Conditions.
- Process payments
- Improve our products and services.
- Administer our website for internal operations including troubleshooting, data analysis, testing, research and statistical purposes.
- Keep our site safe and secure.

If you have provided your explicit consent we may also, from time to time:

- Use your information to contact you for market research purposes. We may contact you by email, phone or mail. We may use the information to customise the website according to your interests.
- Periodically send promotional email about new services, special offers or other information which we think you may find interesting, using the email address which you have provided.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

We retain your personal information for only as long as stipulated within our Data Retention Policy or where required in accordance with our client contractual retention period. We do not seek to retain data for any longer than necessary to carry out our service and fulfil our statutory and contractual obligations.

## How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer, however this may prevent you from taking full advantage of the website.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy policy applicable to the website in question.

## Your rights relating to your personal data

You have the right to request: (i) access to your personal data; (ii) an electronic copy of your personal data (portability); (iii) correction of your personal data if it is incomplete or inaccurate; or (iv) deletion or restriction of your personal data in certain circumstances provided by applicable law. These rights are not

absolute. Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

If you would like to request a copy of your personal data (commonly known as a "data subject access request") or exercise any of your other rights, please email us on [marketing@stepsdrama.com](mailto:marketing@stepsdrama.com). A small fee may be payable.

If you believe that any information we are holding on you is incorrect or incomplete, please email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

If you have any questions concerning this policy, personal information that we hold on you, or you would like to change your personal information or make a complaint please contact us directly at [marketing@stepsdrama.com](mailto:marketing@stepsdrama.com)

If we cannot fully resolve your complaint, you have the right to make a complaint to the Information Commissioner's Office (ICO), at <https://ico.org.uk/concerns/> or email [casework@ico.org.uk](mailto:casework@ico.org.uk) with your complaint.

## Data Controller

The data controller responsible in respect of the information collected on this website is Steps – Drama, Learning, Development Limited. Steps – Drama, Learning, Development Limited is registered under Information Commissions Office – Reg. no. Z7502326