

# Privacy Policy

This document sets-out how we undertake to treat the personal information which you provide to us

We are committed to safeguarding the privacy of our website visitors and users of our software.

This policy sets out how we will treat the personal information that you provide to us.

### (1) What information do we collect?

In order for us to provide our services to you we may collect, store and use various types of personal data the most common types of which are:

#### For staff:

- logon details name, password, e-mail address
- location of workplace
- pay grade
- training records
- appraisal records
- personal achievement records (e.g. certificates etc.)
- qualifications
- booked absences and reasons for absence

Please note that the data you provide to us will only be accessible by you whilst you/your employer/your educational establishment have a current subscription for our services.

With regard to each of your visits to our site we may 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; information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products 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.

### (2) Using your personal data

Personal data we hold about you will be stored on servers within the European Economic Area (EEA) or in jurisdictions with equivalent data security arrangements and will be used for the purposes specified in this privacy policy or in relevant parts of the website. We will not be responsible for the security of the data if you access personal data from outside the EEA or a jurisdiction with equivalent data security arrangements.

We may use your personal information to:

- (a) administer the website;
- (b) improve your browsing experience by personalising the website;
- (c) enable your use of the services;
- (d) provide information about changes to our services or their use;
- (e) help us try to keep our site safe and secure.

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

#### (3) Other disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose information about you:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
- (d) to the purchaser (or prospective purchaser) of any business or asset to which we are (or are contemplating) selling.

Except as provided in this privacy policy, we will not provide your information to third parties.

## (4) Security of your personal data

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will not ask you for your password.

#### (5) Cookies

We use cookies on this website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored by your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of our websites, to improve the websites' usability and for marketing purposes.

Most browsers allow you to refuse to accept cookies. This will, however, have a negative impact upon the usability of many websites, including this one.

#### (6) Policy amendments

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our privacy policy by e-mail.

#### (7) Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information may be subject to the payment of a fee.

You may instruct us not to process your personal data for marketing purposes by e-mail (to enquiries@walnutconsultancy.com) at any time. (In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.)

# (8) Third party websites

If our websites contain links to other websites, we are not responsible for the privacy policies or practices of third party websites and you should check these carefully before submitting any personal data.

#### (9) Updating information

Please let us know if the personal information which we hold about you needs to be corrected or updated. We will make such changes as soon as reasonably possible after you tell us about them.

#### (10) Contact

If you have any questions about this privacy policy or our treatment of your personal data, please write to us:

- by e-mail at enquiries@walnutconsultancy.com
- or by post to Walnut Computer Consultancy Ltd., 12 Payton St, Stratford-upon-Avon, CV37 6UA.