

Privacy and Security

Nevevia Limited (“we”) respect the privacy of our users and our intention is to provide you with an enjoyable, safe browsing experience.

This privacy and security policy (together with our terms of use and any other documents referred to on it) sets out the basis on which we use and protect any information that we gather from your use of the site and applications at <http://www.app.nextstepcards.co.uk> (“the site”). References to “you” and “your” shall be deemed to be references to the person using or navigating the site and references to “we”, “us” and “our” shall be deemed to be references to Nevevia Limited, a company registered in England and Wales under company number 10573460 and with our registered office at Redesmere Countess Of Chester Health Park, Liverpool Road, Chester, CH2 1BQ.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the site you are accepting and consenting to the practices described in this policy. We may change this policy at any time by updating this page and you should check this page from time to time to ensure that you are happy with any changes

Information we collect from you

We will collect and process the following information about you:

- **Information you give us.** You may give us information about you by filling in forms on the site, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the site, subscribe to our service, search for items, place an order on the site, participate in discussion boards or other social media functions on or via the site, enter a competition, promotion or survey and when you report a problem with the site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph. In using our services, it is important that you do not input personal sensitive information about third parties. You are responsible for safeguarding the information that you collect from third parties and we accept no responsibility for your breach of that obligation.
- **Information we collect about you.** We may automatically collect 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 the 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
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate, or the websites of our affiliates, or the other services that we provide. We are working closely with third parties (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.

Cookies

We use cookies to distinguish you from other users of the site. This helps us to provide you with a good experience when you browse our website and also allows us to improve the site. A cookie does not give us access to your computer or the data stored on it. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

What we do with the information we collect

We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to notify you about changes to our service;
- to ensure that content from the site is presented in the most effective manner for you and for your computer;
- to administer the site and for internal operations, including record keeping, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our service, when you choose to do so;

Following your consent for us to contact you with other news and updates, we may use your information in the following ways:

- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form, or registration form);
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

We will periodically review your personal information to ensure that we do not keep it for longer than is permitted by law.

Why do we process your personal information?

We will only collect and use your personal data in accordance with current data protection laws and legislation. The data controller is Nevexia Limited. Our grounds for processing your data are as follows:

- **Consent** – we will only use your information to contact you with newsletters regarding company or product developments, marketing of new products or any other type of advertising if you have given your express consent for us to do so. You are able to review and remove this consent at any time by contacting us (details at the bottom of this document)
- **Contract** – we will use your information to provide you with the services and information necessary to fulfil our obligations to you as a Next Step Practitioner. This will include, but not be limited to, contacting you regarding training events, providing pre-course materials, providing post-course documentation including documents, materials, evaluations and regular information and updates regarding the online application. Where you continue to use the online application, we may use your personal information to extract data for analysis

regarding use of the service and Next Step cards to provide analytic reports to you as the customer as agreed on purchase. If the purchase was made on your behalf by a third party, the data will be used to provide analytic reports to the purchaser, however the reports themselves will never include identifiable information or contact details, only generic information regarding job title and geographical area of use.

- **Legitimate interests** – we may use some of your personal information where we have legitimate business grounds for doing so. Our legitimate interests for processing your personal data are:
 - to enable you to access and use the site;
 - to allow continuous review and improvement of our site. We may use some of your personal information to undertake analysis of how you use the site, and which pages/information are used most frequently.

You have the right to object to your data being used for these legitimate interests, you can do so using the contact details included at the bottom of this email.

Disclosure of personal information to other organisations

If your Next Step licence has been purchased on your behalf by another individual or organisation, we will share your information with them in order to fulfil our contract obligations.

We may share your information with selected third parties including business partners, affiliates, suppliers and sub-contractors for the performance of any contract we enter into with them or you. We may also share your information with analytics and search engine providers that assist us in the improvement and optimisation of the site.

We may disclose your information to third parties: in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; if Nevexia 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 if 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, or safety of Nevexia Limited, our customers, or others (this includes exchanging information with other companies and organisations for the purposes of fraud protection and in the course of criminal investigations).

How to amend your permissions

All emails and other forms of communication from us to you will include clear instructions on how to unsubscribe from our mailing lists. Details of how to contact us can be found at the bottom of this document.

How we keep your data secure

We strive to ensure 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 online. However, where we have given you (or where you have chosen) a password which enables you to access certain parts of the site, it is your responsibility to keep this password confidential. We ask that you do not share your password with any third party.

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 the site; any transmission is at your own risk.

The 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.

Your information rights

You may request details of personal information about you that we hold. Any access request will be free of charge. Requests can be made using the contact details at the bottom of this document.

You have the right to have personal data amended if it is inaccurate or incomplete. Any request for rectification can be made verbally or in writing.

You have the right to request your information is erased from our systems (right to be forgotten) when it is no longer necessary for the original purpose, you withdraw your consent for processing and/or you object to us processing your data under the Legitimate Interests stated above. You can make the request either verbally or in writing.

You have the right to restrict the processing of your personal data and limit the ways in which we use it.

You have the right to request we move or transfer your data to another business or organisation.

You have the right to object to our use of your personally information including where we use it for our legitimate interests, or where we use your personal information to inform our analytics and user demographics. If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will provide a detailed explanation of why we are continuing to process your data.

Contact

If you have any questions, comments or requests regarding this privacy policy or use of the site, then please contact us at support@nevexia.com