

# Proxi

The Agency Alternative

## Data Privacy Policy

### **Data Privacy Policy and Legal**

The Proxi Education Limited Company Data Privacy Policy outlines our commitment as a business to treat information of our employees and co-operatives and customers with the utmost care and confidentiality.

This policy ensures that we gather, store and handle sensitive data fairly, transparently and with the respect towards individual's rights. This policy refers to employees, co-operatives and customers who provide their information to us.

### **Policy Elements**

To enable our organisation to operate, we are required to obtain and process information. This information includes any offline or online data that makes a person identifiable for example, Names, Addresses, Digital Footprints, Photographic ID, Financial Information etc. Our company policy is to collect this data in a transparent way and only with the full cooperation and knowledge of the employee, co-operative or customer. Once this information is available to us, the following rules apply:

#### **Our Data will be:**

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Only used within Proxi Education Limited or by approved third party data processors
- Protected against any unauthorised access by internal or external parties

#### **Our Data will not be:**

- Sold to any third parties
- Communicated informally
- Be kept for longer than necessary

In addition to ways of handling the data, Proxi Education Limited has an obligation towards people to whom the data belongs. We must:

- Let employees, co-operatives and customers know which of their data is being collected
- Inform employees, co-operatives and customers that we monitor, record and store telephone communications to check any instructions provided to us
- Inform employees, co-operatives and customers about how we will process their data

- Inform employees, co-operatives and customers about who has access to their information.
- Allow employees, co-operatives and customers to request that we modify, erase, reduce or correct data contained in our databases.

To exercise data protection, Proxi Education Limited Ltd are committed to:

- Continue with transparent data collection procedures.
- Train employees, co-operatives in online privacy and security measures.
- Document an IT Policy detailing how secure our networks are and how our business protects online data from Cyberattacks.
- Offering our customers the opportunity within each marketing communication to change their marketing preferences or opt-out entirely, as well as making a 'Data Changes requests' available so that this can be done at any time with written permission from the data owner.
- Continue with data protection procedures for all customer and employee/co-operative data.

## **Our website**

Our website is powered by Go Daddy, our third-party web services provider. Go Daddy is committed to ensuring that data is processed in accordance with applicable data privacy laws and is kept secure. Go Daddy is certified to the standard of ISO27001 (an international standard for information security). Go Daddy uses its own data centres and as its cloud platform provider. All data processed by Go Daddy is stored on web servers in the EEA.

## **If you visit our website**

We may collect the following information:

- Title
- First Name
- Last Name
- Email Address
- Telephone/Mobile
- Enquiry Details
- Previous assignment details
- Your professional role and grade

It is in our business's legitimate interest to collect your personal information so that we can process your enquiry and respond to you accordingly.

Your email address will also be used to allow us to send you a confirmation receipt in respect of your enquiry. We are also joint employers with People Group Services (People PAYE

Limited) and they will process this data on our behalf to ensure that adequate details are collected for taxation and UK payroll purposes. They will ask for your National Insurance Number and Bank details amongst other sensitive data under a secure portal. Please read their terms and conditions for data handling.

We will not collect any personal data from you that we do not need in order to provide and oversee this service to you. All of the personal data we process is processed by Proxi Education Limited staff and the Data Processor in the UK. However, for the purposes of IT hosting and maintenance, this data is held on servers within the European Union. No third parties have access to your personal data unless you or the law requires us to grant it.

In addition to this enquiry, we may use our business's legitimate interest to send you marketing that we believe will be relevant to you. If you no longer wish for us to send you marketing, you will be able to use the unsubscribe link in any of our digital marketing communications, inform us in writing by contacting the Proxi Education Limited. When your enquiry is received into our business, subject to the role/location you have enquired with, we will load your personal details into one of our secure CRM systems. We will keep the personal data you have supplied to us only for as long as is necessary.

**Under data privacy laws, you have the rights to:**

- Request access to your personal data;
- Request deletion or correction of your personal data; and
- Request that your personal data be transferred to another person.

**At any time you may ask to:**

- See your data  
You can ask to see any personal information that we hold (known as a "subject access request") by contacting us. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
- Transfer your data  
You can ask us to provide your data to a third party.
- Delete your data  
You can ask us to delete the information we hold about you.
- Change your data  
If we do hold information about you, you can also ask us to correct any mistakes by contacting us.

- **Marketing Preferences**

You can tell us how you would like us to send you marketing information or ask us to stop marketing to you entirely.

## **Data Storage**

Any data that is collected is stored until such point the request has been completed, after which it is deleted.

## **What are your rights?**

In accordance with the EU General Data Protection Regulation 2016, you have a number of rights which can be found at Data Subject Rights and which are also outline above. If you wish to raise a complaint on how we have handled your personal data, you can contact our Compliance Manager who will investigate the matter personally. If you are not satisfied with our response or believe we are processing your personal data in a way that does not comply with the law you can raise a complaint with the Information Commissioners Office.

## **LEGAL**

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## **Severance**

If any of these terms are found to be illegal, invalid, or otherwise unenforceable, then to the extent of such illegality, invalidity or unenforceability, such terms shall be deleted and severed from the website terms. The remaining enforceable terms shall continue in full force and effect and continue to be binding. Nothing in these terms shall exclude or limit our liability for death or personal injury resulting from our negligence or shall affect your statutory rights if you are a consumer.

## **Law**

These terms shall be governed by and construed in accordance with English law, unless you live in Scotland when Scots law will apply or in Northern Ireland, when the law of Northern Ireland will apply. Disputes arising in relation to them shall, unless expressly agreed otherwise, be subject to the exclusive jurisdiction of the relevant courts of the United Kingdom.