



Privacy Policy

This document sets out when and how we use your personal information that you or others provide to us.

1. WHO WE ARE

We are Insendi Limited, a limited company registered in the UK with number 11098726.

Our registered address is: 50 Sloane Avenue, London, England, SW3 3DD

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our data protection officer Mr Marc Wells by email at admin@insendi.com.

2. HOW DO YOU USE MY DATA?

When you use this website in your studies

When you enroll on this website, or are enrolled by your institution, we will collect the following information from you: full name, e-mail address, username, institutional ID code (if available) and profile image (if available).

As you use this website we may collect the following information from you:

- A biography (should you decide to add this)
- Links to your social media pages (should you decide to add this)
- A record of the time that you interact with the different webpages, and the activities within them, together with any contributions made.
- A record of any communications made within the platform to other users.

We will use this information to

- Add you to the website areas relating to your programmes and courses and
- If you are a student:
 - Provide you with feedback as you progress through your courses
 - Enable your institution to view reports on your progress and contributions
 - Allow other users to see some of your contributions and to communicate with you
- If you are a teacher or administrator:
 - Enable you to create learning programmes, courses and activities
 - Allow you to view the progress of your students
 - Allow you to communicate with other users

If our business is sold:

We will transfer your personal information to a third party:

- if we sell or buy any business or assets, we will provide your personal information to the seller or buyer (but only to the extent we need to, and always in accordance with data protection legislation); or
- if Insendi Limited or the majority of its assets are acquired by somebody else, in which case the personal information held by Insendi Limited will be transferred to the buyer.

We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the relevant seller or buyer of our business may not be able to provide services to you.

Will we share your data with others?

To enable certain functions of the website, we may we share your personal information with our subcontractors (For example an email provider to enable us to provide you with email notifications if you request these). In such cases we will ensure that only the minimum required information is shared (For example your email address).

In certain circumstances we may also need to share your personal information if we are under a duty to disclose or share it to comply with a legal obligation.

3. WHAT ABOUT TECHNICAL INFORMATION AND ANALYTICS?

Information we collect about you: When you visit our site we will 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, screen resolution, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our site (including date and time), 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.

Use of ‘Cookies’

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

We use two different cookies:

Cookie	Purpose
Authentication token	This cookie enables us to keep you logged into the application, without this cookie you would have to enter your username and password on every page of the application. This cookie lasts only for your browser session.
Redirection cookie	This cookie is used to record which page you requested to visit before logging in, once logged in, we return you to this page and remove this cookie

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, which we do not have any control over. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after 2 years.

4. WHERE IS MY DATA STORED?

We (and many of our external third parties) are based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside of the EEA.

Whenever we transfer your personal information outside of the EEA, we ensure it is protected by making sure at least one of the following safeguards is in place:

- by transferring your personal information to a country that has been deemed to provide an adequate level of protection by the European Commission;
- by using specific contracts approved by the European Commission which give your personal information the same protection it has
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

To keep this privacy policy as short and easy to understand as possible, we have not set out the specific circumstances when each of these protection measures are used. You can contact us at marc@insendi.com for the details as to how we protect specific transfer of your data.

All information you provide to us is stored on our secure servers or those of our third party data storage providers.

5. HOW LONG DO WE RETAIN YOUR DATA FOR?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or legal requirements

To determine the appropriate retention period for the personal information we hold, we consider the amount, nature and sensitivity of the personal information, the risk of harm from unauthorised use or

disclosure of your personal information, the reasons why we handle your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

6. YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

You have the right to object to us handling your personal information when:

- we are handling your personal information based on our legitimate interests (as described in the “How do you use my data” section above). If you ask us to stop handling your personal information in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your personal information should continue; or
- for marketing purposes. If you ask us to stop handling your personal information on this basis, we will stop.

7. WHAT ARE MY RIGHTS UNDER DATA PROTECTION LAWS?

You have various rights under the data protection laws, which you can exercise by contacting us. The easiest way to do this is by email at marc@insendi.com.

Right of access

You are entitled receive confirmation as to whether your personal information is being processed by us, as well as various other information relating to our use of your personal information.

You also have the right to access your personal information which we are handling.

Right to rectification

You have the right to require us to rectify any inaccurate personal information we hold about you. You also have the right to have incomplete personal information we hold about you completed, by providing a supplementary statement to us.

Right to restriction

You can restrict our processing of your personal information where:

- you think we hold inaccurate personal information about you;
- our handling of your personal information breaks the law, but you do not want us to delete it;
- we no longer need to process your personal information, but you want us to keep it for legal reasons; or
- where we are handling your personal information because we have a legitimate interest (as described in the “How We Use Your Data” section above, and are in the process of objecting to this use of your personal information.

Where you exercise your right to restrict us from using your personal information, we will then only process your personal information when you agree, except for storage purposes and to handle legal claims.

Right to data portability

You have the right to receive your personal information in a structured, standard machine readable format and to send this to another organisation controlling your personal information.

This right only applies to your personal information we are handling because you consented to us using it or because there is a contract in place between us.

Right to erasure

You have the right to require us to erase your personal information which we are handling in the following circumstances:

- where we no longer need to use your personal information for the reasons we told you we collected it for;
- where we needed your consent to use your personal information, you have withdrawn your consent and there is no other lawful way we can continue to use your personal information;
- when you object to our use of your personal information and we have no compelling reason to carry on handling it;
- if our handling of your personal information has broken the law; and
- when we must erase your personal information to comply with a law we are subject to.

Right to complain

You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

8. WHAT ABOUT WEBSITES WE LINK TO?

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates.

Our site connects you to different websites. If you follow a link to any of these websites or use our services, please note that you have left our site and these websites have their own privacy policies.

We do not accept any responsibility or liability for these policies or websites. Please check their policies before you submit any personal information to these websites.

9. WHEN WILL YOU CHANGE YOUR PRIVACY POLICY?

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or post.

Please check back frequently to see any updates or changes to our privacy policy.

10. HOW DO I CONTACT YOU WITH FEEDBACK?

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to admin@insendi.com.

This privacy policy was last updated on **16th August 2018**.