

Privacy Policy

Market Squared Limited (we, us, our) are committed to protecting and respecting your privacy.

This privacy policy (**Privacy Policy**) (together with our **Terms of Access** and any other documents referred to) sets out the basis on which any personal data we collect from you (**Personal Data**), or that you provide to us via our online training portal, Volcube, will be processed by us.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

For the purpose of data protection legislation, Market Squared Limited of Imperial House 21-25 North Street, Bromley, United Kingdom, BR1 1SD is a data controller and is registered with the UK Information Commissioner's Office (**ICO**) with registration number ZA136567.

Data protection law says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely

If you have any questions about this notice or how we collect and use personal information about you please contact us.

1. INFORMATION WE MAY COLLECT

We may collect and process the following information about you:

- 1.1. **Information you provide by filling in forms on Volcube.** This includes your name, contact details, payment details (where applicable) and any other information provided at the time of registering to use Volcube (whether you are signing up for our free trial (**Free Trial**) or you are subscribing to our services (**Subscription**), posting material, raising general enquiries or requesting further services.

We will keep and use that information to carry out our contract with you (if applicable), to comply with any legal requirements for us to maintain certain records or carry out certain verifications, and/or for our legitimate interests in administering our services, as well as to review and improve our offerings.

Where your information relates to a contract, it is kept for a period of up to one year after your account is closed to enable us to deal with any after sales enquiries or claims and as required for tax purposes.

Where we hold your payment information, this is held by our payment card processing provider and is retained for a period of up to one year after your account is closed.

Any other information is kept for up to one year.

- 1.2. **Performance information.** This includes information obtained in connection with the training, assessments and/or evaluations which you may undergo and/or participate in as part of the Volcube services. We keep and use this information to carry out our contract with you (if applicable) and for our legitimate interests in administering our services. We retain this information for up to one year after your account is closed. We may also use this performance information to create aggregate and statistical data. This aggregate and statistical data does not identify individuals and is not personal data.

- 1.3. **Correspondence.** This includes details of any correspondence in the event that you contact us or when you report a problem with Volcube or regarding the services provided by us. We keep and use this information to carry out our contract with you (if applicable) and for our legitimate interests in administering our services. We retain this information for up to one year.
- 1.4. **Survey information.** Where you complete surveys we use the results of those surveys for research purposes. We will always give you the option whether or not to participate in any surveys. We keep and use this information for our legitimate interests in developing marketing research and developing our business. We retain this information for up to one year.
- 1.5. **User generated content.** This is information about you which you provide when you post content on our website. This may include reviews and other content which you post on our website. We may display and publish this information on our website as part of our contract with you or as necessary for our legitimate interests in providing content to our users. This information is kept for as long as you have an account with us and may be retained and displayed indefinitely after you close your account. You are able to remove or delete any content which you post at any time while your account is active.
- 1.6. **Website information.** We may collect information about you and your use of our website via technical means such as cookies, webpage counters and other analytics tools. We use this as necessary for our legitimate interests in administering our website and to ensure it operates effectively and securely. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Notice. We keep this website information about you for three months from when it is collected or the relevant cookie expires.

Our website may, from time to time, contain links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

- 1.7. **Aggregate Data.** With regard to each of your visits to Volcube we may automatically collect the following information:
 - technical information, including the internet protocol 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; and
 - information about your visit, including the full uniform resource locators (URL) clickstream to, through and from Volcube (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.

We keep and use this information to carry out our contract with you (if applicable) and for our legitimate interests in system administration, to report aggregated information to our advertisers and/or commercial partners or otherwise in accordance with this Privacy Policy. This is statistical data about our users' browsing actions and patterns, and does not contain any personal data.

- 1.8. **Employee Information.** If you work for one of our customers, suppliers or business partners, the information we collect about you may include your contact information, details of your employment and our relationship with you. This information may be collected directly from you, or provided by your organisation. Your organisation should have informed you that your information would be provided to us, and directed you to this policy. We use this as necessary for our legitimate interests in managing our relationship with your organisation. If we have a business relationship with you or your organisation, we may receive information about you from your organisation. We keep this information for up to seven years after the end of our relationship with your organisation.

2. **EMPLOYMENT OPPORTUNITIES.**



We may, where you have consented to us doing so, combine the information you give to us with information we collect about you in connection with your use of Volcube (and your performance in connection with the training, assessments and/or evaluations) and may share such information with third parties who have employment opportunities (in the financial sector) which we (or they) feel may interest you. We will only share your information with named third parties who you have agreed we can share such information with.

3. MARKETING

- 3.1. We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party. If a third party collected your name and contact details, they will only pass those details to us for marketing purposes if you have consented to them doing so.
- 3.2. You always have the right to “opt out” of receiving our marketing. You can exercise the right at any time by contacting us. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you “opt-out” of our marketing materials you will be added to our suppression list to ensure we do not accidentally send you further marketing. Where you unsubscribe from any postal marketing, you may initially still receive some content which has already been printed or sent, but we will remove you from any future campaigns. We may still need to contact you administrative or operational purposes, but we will make sure that those communications don’t include direct marketing.
- 3.3. If you are an existing customer or are acting in a professional capacity as part of a company or LLP we use your contact details as necessary for our legitimate interests in marketing to you and maintaining a list of potential customers.
- 3.4. If you are not an existing customer, and are not acting in a professional capacity as part of a company or LLP, we will only contact you for marketing purposes with your consent (whether we have collected your details directly from you, or through a third party).
- 3.5. We never share your name or contact details with third parties for marketing purposes unless we have your “opt-in” consent to share your details with a specific third party for them to send you marketing. We may use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 3.6. We retain your details on our marketing list until you “opt-out” at which point we add you to our suppression list. We keep that suppression list indefinitely to comply with our legal obligations to ensure we don’t accidentally send you any more marketing.

4. JOB APPLICATIONS

- 4.1. We will collect and hold information on job applicants, including information you provide to us in your application, or provided to us by recruitment agencies, as well as information on you from any referees you provide. We may also collect information about your professional history which you make available on LinkedIn, or which are on your employer’s website.
- 4.2. We use this as necessary to enter into an employment contract with you, and for our legitimate interests in evaluating candidates and recording our recruitment activities, and as necessary to exercise and perform our employment law obligations and rights. Where you voluntarily provide us with special categories of data, such as information about your race, health or sexuality, we will store this as part of your application on the basis that you have decided to make it public to us for this



purpose, and to ensure that our record of your application is accurate so we can comply with (and demonstrate our compliance with) our obligations under employment law.

- 4.3. If you are successful in your application, your information will be used and kept in accordance with our internal privacy notice. If you currently work for us, or used to work for us, you can request a copy of this from us. If you are not successful in your application, your information will be held for up to six months after the relevant round of recruitment has finished.
- 4.4. You must provide certain information (such as your name, contact details, professional and educational history) for us to consider your application fully. If you have not provided all of this information, we may contact you to ask for it. If you do not wish to provide this information, we may not be able to properly consider your application.
- 4.5. If you are listed as a referee by an applicant, we will hold your name, contact details, professional information about you (such as your employer and job title) and details of your relationship with the applicant. We will use this information as necessary for our legitimate interests in evaluating candidates and as necessary to exercise and perform our employment law obligations and rights. Your information will be kept alongside the applicant's information.
- 4.6. If you are listed as an emergency contact by someone who works for us, we will hold your name, contact details and details of your relationship with that worker. We will use this to contact you as necessary to carry out our obligations under employment law, to protect the vital interests of that worker, and for our legitimate interests in administering our relationship with that worker. Your information will be kept until it is updated by that worker, or we no longer need to contact that worker after they have stopped working for us.

5. LEGAL CLAIMS

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim.

6. INFORMATION WE RECEIVE FROM THIRD PARTIES

- 6.1. We may also receive information about you from the following sources:
 - 6.1.1. **Our education partners.** We work with universities, education providers and businesses which run in-house or outsourced training, which may provide us with information about you, to be used as set out above.
 - 6.1.2. **Our service providers.** We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) who may provide us with information about you, to be used as set out above.
 - 6.1.3. **Businesses we have bought.** If we have acquired another business, or substantially all of its assets, which originally held your information, we will hold and use the information you provided to them, or which they otherwise held about you, in accordance with this privacy notice.
 - 6.1.4. **Our other channels.** This is information we receive about you if you use any of the other websites we operate or the other services or products we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this website. We will also have told you for what purpose we will share and combine your data.

7. SPECIAL CATEGORIES OF DATA

We do not collect any “special categories” of more sensitive personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, as well as information about criminal convictions and offences).

8. WHY ELSE DO WE USE YOUR INFORMATION?

8.1. **Common uses of your information.** We will only use your personal information when the law allows us to do so. Although in limited circumstances we may use your information because you have specifically consented to it, we generally use your information in the ways set out in this notice because:

8.1.1. we need to perform a contract we have entered into with you.

8.1.2. we need to comply with a legal obligation.

8.1.3. it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests.

8.1.4. we need to protect your interests (or someone else’s interests) or where it is needed in the public interest (although these circumstances are likely to be rare).

8.2. **Change of purpose.** We will only use your personal information for the purposes for which we collected it as set out in this notice, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

9. SHARING YOUR INFORMATION

As well as any sharing listed above, we may also share your information with third parties, including third-party service providers and other entities in our group. Third parties are required to respect the security of your personal information and to treat it in accordance with the law. We never sell your data to third parties.

9.1. Why might we share your personal information with third parties?

We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our customers, or others or where we have another legitimate interest in doing so. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

9.2. Which third-party service providers process your personal information?

We also may need to share your personal information for third-party service providers (including contractors and designated agents) so that they can carry out their services. The following activities are carried out by third-party service providers: website hosting, data hosting and other IT services, sending marketing emails and payment processing.

9.3. When might we share your personal information with other entities in the group?

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.

9.4. How secure is your information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. Where third parties process your personal information on our behalf as “data processors” they must do so only on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

9.5. **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business where necessary in connection with the purposes which your information was collected for. We may also need to share your personal information with a regulator or to otherwise comply with the law.

10. **WHERE WE STORE YOUR INFORMATION**

- 10.1. Our office headquarters are based in Bromley in the UK and our main data centre is located in London in the UK. However, where required to perform our contract with you or for our wider business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside the UK and the EU. It may also be processed by staff operating outside the UK and EU who work for us or for one of our service providers.
- 10.2. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice.
- 10.3. Some countries or organisations outside of the UK and the EU which we may transfer your information to will have an “adequacy decision” in place, meaning the EU considers them to have an adequate data protection regime in place. These are set out on the European Commission website: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- 10.4. If we transfer data to countries or organisations outside of the UK and the EU which the EU does not consider to have an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by the EU or a data protection authority) are put in place where required. To obtain more details of these safeguards, please contact us.

11. **DATA SECURITY**

As well as the measures set out above in relation to sharing of your information, we have put in place appropriate internal security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

12. **HOW LONG WILL WE KEEP YOUR INFORMATION FOR?**

- 12.1. We have set out above indications of how long we generally keep your information. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 12.2. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

- 12.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

13. YOUR RIGHTS

- 13.1. Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office (ICO). Under certain circumstances, by law you have the right to:

- 13.1.1. **Be informed** in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- 13.1.2. **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 13.1.3. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 13.1.4. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 13.1.5. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
- 13.1.6. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 13.1.7. **Request the transfer** of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- 13.1.8. **Withdraw consent.** In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- 13.1.9. **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please contact us.

13.2. **No fee usually required.** You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

13.3. **What we may need from you.** We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13.4. **Timescale.** Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

14. **CHANGES TO THIS PRIVACY NOTICE**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice.

15. **CONTACT**

If you have any questions or comments in relation to your use of Volcube and/or the services available on it please contact us at support@marketsquared.co.uk.

Thank you for using Volcube.