

CITY CAREER SERIES PRIVACY POLICY

1. INTRODUCTION

This privacy policy (**Policy**) relates to your personal information in connection with your use of and access to the City Career Series websites (www.CityCareerSeries.com and www.CommercialLaw.Academy) (the **City Career Series Platform**) and any services provided by City Career Series, including the provision or sale of handbooks (the City Career Series Platform and services together forming the **City Career Series Services**).

We are committed to protecting your information and your right to privacy. If you have any questions or concerns about our Policy, or our practices with regards to your personal information, please contact us via information@citycareerseries.com.

When you use the City Career Series Services, you trust us with your information and we take your privacy very seriously. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue your use of the City Career Series Services.

2. CHANGES TO THIS POLICY OR YOUR PERSONAL INFORMATION

We review this Policy regularly and it is your responsibility to check regularly and determine whether you still agree to comply with the Policy. If you do not agree to any changes to this Policy then you must immediately stop using the City Career Series Services. In the event we make any significant changes to this Policy we will use our reasonable endeavours to inform you of such changes in advance in writing.

It is important that the personal information we hold about you is true, complete, accurate and current. Accordingly, you must notify us of any changes to your personal information (for example, if you change your email address).

3. ABOUT US

The City Career Series Services are owned and operated by City Career Series Limited (trading as “City Career Series” and “Commercial Law Academy”), a company registered in England and Wales with company number 08915930 and whose registered office is situated at 3 Stirling Court, Stirling Way, Borehamwood, Hertfordshire, United Kingdom, WD6 2FX (**City Career Series/we/us/our**).

City Career Series is the controller (also known as a data controller) of, and is responsible for, your personal information. The term “you” refers to the user wishing to access and/or use the City Career Series Services.

The City Career Series Platform provides a comprehensive range of educational resources relating to the recruitment process for a wide variety of City careers, as well as resources designed to support the professional development of graduates.

This includes (but is not limited to) an e-learning platform through which you can purchase access to online content (www.commerciallaw.academy), an online store through which you can purchase physical books (<https://shop.citycareerseries.com>), and access to paid-for webinars hosted via third party software (for example www.ClickMeeting.com) (together, our **Products**).

4. INFORMATION WE MAY COLLECT ABOUT YOU

4.1 Personal information you disclose to us

In Short: We collect personal information that you provide to us including information such as your name, address, contact information, job title, university, social media handles/URLs and payment card information.

We collect personal information that you voluntarily provide to us when registering to use and actually using the City Career Series Services, or otherwise contacting us.

The personal information that we collect depends on the context of your interactions, the choices you make and the products and features you use. When you use the City Career Series Services and/or when you otherwise deal with us, we may collect the following information about you (the **Information**):

- **Identity Data**, which includes your first name, last name and gender.
- **Contact Data**, which means the data we use to contact you including your billing address, delivery address, email address and contact number.
- **Financial Data**, which means the payment method and card association used to process your payments for Products. We do not store or process your card details ourselves; they are processed and stored via one of our contracted third-party service providers (for example, Stripe and PayPal).
- **Transaction Data**, which means details about transactions you have made using the City Career Series Services, including the payments to and from you along with other details of products you have purchased from us.
- **Profile Data**, which includes your username, email address and log-in data, details of any purchases or orders made by you, and your interests, preferences, feedback and survey or questionnaire responses.
- **Usage Data**, which includes Information about how you use the City Career Series Services. This includes your browsing patterns and Information such as how long you might spend on one of our webpages on the City Career Series Platform and what you look at and for, the page that referred you to the City Career Series Platform and the click stream during your visit to our website, page response times, and page interaction Information (for example, clicks you make on a page).
- **Marketing and Communications Data**, which includes your preferences with regards to receiving marketing from us and your other communication preferences.
- **Other Information relevant to services, customer surveys, questionnaires and/or offers.**

4.2 Information automatically collected

In Short: Some Information – such as IP addresses and/or browser and device characteristics – is collected automatically when you use the City Career Series Platform.

We automatically collect certain Information when you visit, use or navigate the City Career Series Platform. This Information does not reveal your specific identity (unless your device name is the same as your name) but may include device and usage Information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, Information about how and when you use the City Career Series Platform and other technical Information. This Information is primarily needed to maintain the security and operation of the City Career Series Platform, and for our internal analytics and reporting purposes.

Like many businesses, we also collect Information through cookies and similar technologies. You can find out more about this in our [Cookie Policy](#).

5. HOW DO WE USE YOUR INFORMATION?

In Short: We process your Information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use your Information collected via the City Career Series Services for a variety of business purposes described below. We process your Information for these purposes in reliance on our legitimate business interests (**Business Purposes**), in order to enter into or perform a contract with you (**Contractual Reasons**), with your consent (**Consent**), and/or for compliance with our legal obligations (**Legal Reasons**). We indicate the specific processing grounds we rely on next to each purpose listed below.

We may process your Information for the following purposes:

- To fulfil and manage any orders in connection with the City Career Series Services (Contractual Reasons). We may use your Information or pass it onto our partners to fulfil and manage your orders, payments, returns, and exchanges.
- To send administrative Information to you for Business Purposes, Legal Reasons and/or possibly Contractual Reasons. We may use your Information to send you product, service and new feature Information and/or Information about changes to our terms and conditions (**T&Cs**) and policies, as many be in place from time to time.
- To send you marketing and promotional communications for Business Purposes and/or with your Consent. We and/or our partners (for instance, other organisations or individuals who collaborate on our books, online courses and/or webinars) may use your Information for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails (see below for further details).
- To facilitate the account creation and log-in process with your Consent. If you choose to link your account with us to a third party account (such as your Google or Facebook account), we use the Information we are consequently allowed to collect from those third parties to facilitate account creation and the log-in process. See the section below headed "How Do We Handle Your Social Media Log-ins" for further information.

- To administer promotions for our Business Purposes and/or with your Consent.
- To request feedback for our Business Purposes and/or with your Consent. For example, we may use your Information to request feedback and to contact you about your use of the City Career Series Platform.
- To protect the City Career Series Services for Business Purposes and/or Legal Reasons. We may use your Information as part of our efforts to keep the City Career Series Services safe and secure (for example, for the purposes of monitoring and/or preventing fraud).
- To enforce our T&Cs and policies for Business Purposes, Legal Reasons and/or possibly Contractual Reasons.
- To respond to legal requests and prevent harm for Legal Reasons. For example, if we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- We may use your Information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve the City Career Series Services, our products and services, our marketing and your experience.

6. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share Information for Contractual Reasons, to fulfil our Business Purposes, or with your Consent.

We only share and disclose your Information in the following situations:

- **Contractual.** We may share Information with our own employees or contractors, third party providers and partners to enable any orders for products or services, or obligations arising out of any such orders, to be fulfilled.
- **Third Party Service Providers.** We may share your Information with third party vendors, service providers, contractors or agents who perform services and require access to such Information to carry out that work. For example, your Information might be shared with such third parties for the purposes of: data analysis, email delivery (e.g. via MailChimp), hosting services (e.g. via GoDaddy), customer service, webinar hosting (e.g. via ClickMeeting) and marketing efforts (e.g. via our digital marketing contractors). They will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential.
- **Compliance with Legal Obligations.** We may disclose your Information where we are legally required to do so in order to comply with applicable laws, governmental requests, judicial proceedings, court orders, or legal processes, such as in response to a court order or a subpoena (including in response to requests from public authorities in order to meet national security or law enforcement requirements).

- **With your Consent.** We may disclose your Information for any other purpose with your Consent.
- **Business Partners.** Provided you have given us Consent to do so we may share your Information with our business partners to offer you certain products, services, resources or promotions.
- **Vital Interests.** We may disclose your Information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, illegal activities or situations involving potential threats to the safety of any person, or where we believe it is necessary for the purpose of providing evidence in connection with litigation proceedings in which we are involved.
- **Business Transfers.** We may share or transfer your Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third Party Advertisers.** We may use third party advertising companies to serve ads when you visit the City Career Series Platform. These companies may use Information about your visits to the City Career Series Platform and other websites that are contained in web cookies and other tracking technologies in order to provide personalised advertisements about goods and services that may be of interest to you. See our [Cookie Policy](#) for further Information.

We may disclose aggregated, anonymous Information (i.e. Information from which you cannot be personally identified), or insights based on such anonymous Information, publicly and to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the City Career Series Services. In such circumstances we will not disclose any Information which can identify you personally.

You acknowledge that any Information you post within the City Career Series Platform (e.g. by way of forum post, course review, book review or discussion post) is posted entirely at your own risk and that by posting to a public platform you make that Information visible to third parties who can use that Information at their discretion.

7. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your Information in countries other than your own, but will take all reasonable steps to ensure it is protected.

Whenever we transfer your Information outside of the UK, we will take all reasonably practicable measures to protect your Information in accordance with this Policy and applicable laws. To the extent that any transfer requires approved safeguards to be in place (for example, using the EU model contract clauses in connection with transfers outside of the European Economic Area, or other appropriate safeguards) we will ensure these measures are in place.

8. THIRD PARTY WEBSITES

In Short: We are not responsible for the safety of any Information that you share with third party providers who feature or advertise the City Career Series Services.

The City Career Series Platform may feature links to third party websites or social media channels or contain advertisements from third parties which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Policy.

We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the City Career Series Platform (including but not limited to the Thinkific, ClickMeeting and MailChimp websites/platforms). You should review the policies of such third parties and contact them directly if you have any related questions.

9. FOR HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your Information for as long as necessary to fulfil the purposes outlined in this Policy, unless a longer retention period is permitted or required by law.

We will only keep your Information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax law, accounting requirements or other legal or regulatory requirements). When we have no ongoing Business Purpose to justify the processing of your Information, we will either delete or anonymise it, or, if this is not possible (for example, because your Information has been stored in backup archives), then we will securely store your Information and isolate it from any further processing until deletion is possible.

10. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your Information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any Information we process. However, please also remember that we cannot guarantee that the Internet itself is 100% secure. Although we will use our reasonable endeavours to protect your Information, transmission of personal Information to and from the City Career Series Platform is at your own risk. You should only access the City Career Series Services within a secure environment.

11. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 16 years of age.

We do not knowingly solicit data from or market to children under 16 years of age. By using the City Career Series Services, you represent that you are at least 16 years of age. If we learn that Information from users less than 16 years of age has been collected, we will deactivate the relevant account(s) and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under 16 years of age, please contact us immediately via information@citycareerseries.com.

12. HOW DO WE HANDLE YOUR SOCIAL MEDIA LOG-INS?

Summary: If you choose to register or log into our website using a social media account, we may have access to certain Information about you.

The City Career Series Platform may offer you the ability to register and log-in using your third-party social media account details (e.g. Facebook, Twitter etc). Where you choose to do this, we will receive certain Information from your social media provider. The Information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture and other Information that you choose to make public. If you log-in using Facebook, we may also request access to other information related to your account, such as friends, check-ins and likes, and you may choose to grant or deny us access to each individual permission.

The Information that you post, transmit, or otherwise make available on such social media platforms may be viewed and/or used by other users of those networks and we have no control over that viewing and use and cannot prevent further use of that Information by third parties.

If you choose to link your City Career Series profile to a social media account, Information that you provide to us in the process may be included on your City Career Series profile. Additionally, your contacts on the social media platform(s) (**Friends**) may be able to see your activity on the City Career Series Platform. A link to your public profile on the social media site may be added to your City Career Series profile and other members and users of the City Career Series Services may be able to see any Friends or links (e.g. friends of Friends) via the social network(s) that you have in common with them.

When you interact with us through social media networks, you acknowledge that we may access your Information that is held by that account, solely in accordance with your social media privacy settings. Any links to social media are not under our control and remain solely your responsibility.

You acknowledge that any Information posted via social media through the City Career Series Platform, or via any third party which you allow to access your content, is posted entirely at your own risk and that by posting to a public platform you make that Information visible to third parties who can use that Information at their discretion.

Please note that we do not control, and are not responsible for, other uses of your Information by your third-party social media provider(s). We recommend that you review their privacy policies to understand how they collect, use and share your Information, and how you can set your privacy preferences on their sites and apps.

13. YOUR CONSENT TO PROCESSING

You will be required to give Consent to certain processing activities before we can process your Information. Where applicable, we will seek Consent from you when you first submit Information to or through the City Career Series Services.

If you have previously given your Consent you may freely withdraw such Consent at any time. You can do this by emailing information@citycareerseries.com or, where applicable, clicking the 'Unsubscribe' button that appears in mailing list communications.

If you withdraw your Consent, and if we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another legal basis for processing your Information, then we may continue to do so subject to your legal rights.

Please note that if we need to process your Information in order for you to use the City Career Series Services and you object or do not provide Consent to us processing your Information, you accept that the City Career Series Services may no longer be available to you.

14. MARKETING AND OPTING OUT

If you have given Consent to marketing we may contact you about our products, services, resources, promotions and special offers. If you no longer wish to receive such Information, you can withdraw your Consent at any time by sending an email to information@citycareerseries.com or unsubscribing from the mailing list communications.

If you have given Consent, we may share your Information with carefully selected third party organisations and business partners (e.g. other organisations or individuals who collaborate on our books, online courses and/or webinars) and they may contact you directly. If you would prefer to no longer receive direct marketing communications from third parties and partners after previously giving your Consent, please contact those third parties and partners directly to withdraw the Consent.

Where you opt out of receiving marketing messages, this opt out will not apply to personal data provided to us in connection with your purchase of products or services (e.g. the purchase of books, subscriptions or webinar tickets), or your involvement in other related transactions.

15. ACCOUNT INFORMATION

You may at any time review or change the Information in your account by logging into your Commercial Law Academy account.

If you wish to terminate your Commercial Law Academy account, please contact us via information@citycareerseries.com and we can help you to do so. Some Information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our T&Cs and/or comply with legal requirements.

16. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You have certain rights in respect of your Information.

You have certain rights in relation to the Information that we hold about you. Details of these rights and how to exercise them are set out below. Please note that we will require evidence of your identity before we are able to respond to any requests. This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further Information in relation to your request to speed up our response. To exercise or discuss any of your rights, please contact us via information@citycareerseries.com.

- **Right of Access.** You have the right at any time to ask us for a copy of the Information that we hold about you and to check that we are lawfully processing it. Where we have good reason, and where data protection law permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reason(s) for doing so.
- **Right of Correction or Completion.** If Information we hold about you is not accurate or is out of date and requires amendment or correction, you have a right to have the data rectified or completed.
- **Right of Erasure.** In certain circumstances, you have the right to request that the Information we hold about you is erased (for example, if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based only on your Consent and there are no other legal grounds on which we may process the Information).
- **Right to Object to or Restrict Processing.** In certain circumstances, you have the right to object to our processing of your Information (for example, if we are processing your Information on the basis of our legitimate interests but there are no longer any compelling legitimate grounds to justify our processing overriding your rights and interests). You may also have the right to restrict our use of your Information, for example during a period in which we are verifying the accuracy of your Information in circumstances where you have challenged the accuracy of that Information.

Right of Data Portability. In certain instances, you have a right to receive the Information that we hold about you (or a portion thereof) in a structured, commonly used and machine-readable format. In such circumstances, you can ask us to transmit your Information to you or directly to a third-party organisation on your behalf. While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests that relate to personal Information of others without their consent.

If we are relying on Consent to process your Information, you have the right to withdraw your Consent at any time. Please note however that this will not affect the lawfulness of the processing that occurred before the withdrawal of such Consent.

17. CONTACT US

We welcome your feedback and questions on this Policy. If you wish to contact us about this Policy or have any other questions, please email us via information@citycareerseries.com.

You have the right to make a complaint at any time to the Information Commissioner's Office (the **ICO**), the UK supervisory authority for data protection issues (<https://ico.org.uk/concerns>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.