

Corndel Ltd Website Privacy and Cookies Notice

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Introduction

We are committed to protecting your privacy. This Website Privacy Policy ("Policy") explains how the Corndel Group (Corndel Limited of 5th Floor, 80 Old Street, London, EC1V 9AZ, company number 10369857, and Corndel Education Limited of 17 Grosvenor Street, London, W1K 4QG, company number 13486506 and their associated brands) ("Corndel", "We", "Us", "Our"), collects and uses your personal data through your use of this website. Personal data means any information describing or relating to an identified or identifiable individual.

Corndel Group is wholly owned by CoEdu Group Limited (trading as Galileo Global Education) which in turn is owned by Galileo Global Education UK Holding Limited.

Corndel Ltd will be the controller of your personal data. In addition, where processing of personal data is undertaken by other companies of the Corndel Group (i.e. Corndel Education Ltd) for their own independent purposes, these companies will also be controllers of your personal data.

It is important that you read this Policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. For example:

- If you are a learner please see our [Privacy Policy for Learners, Clients and Line Managers](#).
- If you are thinking of applying for a job with Corndel please see our [Privacy Policy for Employees and Job Applicants](#).

This Policy supplements these other privacy policies and is not intended to override them.

What personal data do we collect?

Corndel collects the following personal data:

- Identity and Contact details including name, (business or personal, as applicable) email address and phone/mobile number, job title, name of employer, country of residence.)
- information about how you interact with and use this website, including event registration details
- internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.

How do we collect your personal data?

You directly provide Corndel with most of the personal data we collect. We collect data and process personal data when you:

- Register with us online.
- Subscribe to our newsletter
- Register for events or insight sessions
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- (where you've consented) via cookies.

How will we use your personal data?

Corndel collects your personal data so that we can:

- manage your registration with us,
- Email you with special offers on other products and services we think you might like.
- Send event invitations
- Send Insight Session invitations
- Reply to any feedback you share through the Contact Us form
- Respond to any PR inquiries created via the Contact Us form.
- To improve our website, products/services, publications, marketing, customer relationships and experiences.
- To administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

Basis for lawful processing of personal data

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Legitimate interests, we may use your personal data where it is necessary to conduct our business and pursue our legitimate interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests.
- Consent, where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to our newsletter.

Please refer to the table below for which legal bases we rely on, as well as further details about the types of personal data we process and purposes of processing.

Purpose of processing	Categories of personal data	Article 6 lawful basis for processing personal data	Legitimate interests for the processing (if applicable)
Marketing communications/Conversion/Lead nurture/Re-engagement and reporting/Sales	Work contact details Employer Job title Engagement with Corndel e.g. website, email, event attendance	6(1)(f) Legitimate Interests	<i>This processing is necessary for our legitimate interests to carry out marketing, develop our products and services and grow our business. Personal data is used in ways that customers would reasonably expect (i.e. as explained in our Website Privacy and Cookie Policy), is proportionate and has minimal privacy impact. Customers are given an option to opt out of marketing. Any relevant data is handled, retained and/or deleted in accordance with the schedules set out in our ROPA</i>
Website performance understanding and management, and website personalisation	Website usage data, device IP and browser ID,	6(1)(f) Legitimate Interests	<i>This processing is necessary for our legitimate interests to carry out marketing, develop our products and services and grow our business. Personal data is used in ways that customers would reasonably expect (i.e. as explained in our Website Privacy and Cookie Policy), is proportionate and has minimal privacy impact. Customers are given an option to opt out of marketing. Any relevant data is handled, retained and/or deleted in accordance with the schedules set out in our ROPA</i>

How long do we store your personal data?

In general, we only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of legal proceedings. Details of the retention schedules and their justification are held in the Corndel Register of Processing Activities (ROPA).

Sharing your personal data

Corndel shares personal data with third parties with whom we work providing us with services. Examples of third parties with whom your personal data will be shared include website service providers including hosting, storage and analytics, IT administrators, and where you attend an event hosted or sponsored by us, the event organisers and logistics companies in connection with the event, solicitors, and other professional advisers. Where third parties are used to process personal data on our behalf, they do so on the basis that they are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of personal data and legal compliance with the UK GDPR and Data Protection Act 2018.

We will never disclose your personal data to any third party for the purposes of marketing.

If the software we use stores personal data outside the UK/EU we will always ensure an appropriate legal mechanism is in place to govern this data transfer such as, but not limited to, and ICO approved International Data Transfer Agreement, an current adequacy agreement between the UK and the country in question, or the UK Extension to the EU-US Data Privacy UK Data Privacy Framework.

In addition, we may share personal data with national authorities to comply with a legal obligation to which we are subject (e.g. in the framework of imminent or pending legal proceedings or a statutory audit) or to law enforcement agencies in connection with any active investigation to prevent unlawful activity.

Corndel takes the securing of your personal data seriously. We have a variety of technical and organisational measures to secure your personal data in accordance with applicable laws.

Marketing

Corndel would like to send you information about our products and services that we think you might like.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Corndel from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, [please click here](#). Or you can use the unsubscribe link at the bottom of any communications you receive from us.

What are your legal rights?

Corndel would like to make sure you are aware of your legal rights. You have a number of rights under data protection laws, which we set out below in further detail, in relation to the way we use your personal data, although these are not absolute, and in some cases we may be unable to accept your request, in which case we will respond to you to explain why.

1. You have the right to request access to your personal data	<p>Often referred to as a "data subject access request", you have the right to request confirmation that your personal data is being processed, access to your personal data (through us providing a copy) and other information about how we process your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.</p>
2. You have the right to ask us to rectify your personal data	<p>You have the right to request that we rectify your personal data if it is not accurate or not complete. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.</p>
3. You have the right to ask us to erase your personal data	<p>In certain circumstances, you have the right to ask us to erase or delete your personal data where there is no reason for us to continue to process your personal data. This right would apply if we no longer needed to use your personal data to provide products and/or services to you, where you withdraw your consent for us to market to you, or where you object to the way we process your personal data (see right 6 below).</p>
4. You have the right to ask us to restrict or block the processing of your personal data	<p>You have the right to ask us to restrict or block the processing of your personal data that we hold about you. This right applies where you believe the personal data is not accurate, you would rather we block the processing of your personal data rather than erase your personal data, where we don't need to use your personal data for the purpose we collected it for but you may require it to establish, exercise or defend legal claims.</p>
5. You have the right to port your personal data	<p>You have the right to obtain and reuse your personal data from us to reuse for your own purposes across different services. This allows you to move personal data easily to another organisation, or to request us to do this for you.</p>
6. You have the right to object to our processing of your personal data	<p>You have the right to object to our processing of your personal data based on our legitimate interests, unless we can demonstrate that, on balance, our legitimate interests override your rights, or we need to continue processing your personal data for the establishment, exercise or defence of legal claims.</p>

7. You have the right not to be subject to automated decisions	(Where applicable) you have the right to object to any automated decision making, including profiling, where the decision has a legal or significant impact on you.
8. You have the right to withdraw your consent	You have the right to withdraw your consent where we are relying on it to use your personal data.

You also have the right to make a complaint to the UK regulator for data protection issues, the Information Commissioner's Office (ICO). However, we would appreciate the opportunity to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Contact details for the Information Commissioner's Office (ICO) can be found at <https://ico.org.uk/global/contact-us/contact-us-public/>

If you want to exercise any of the above rights, please contact us, writing to either gdpr@corndel.com or **to: The Data Protection Officer, Corndel Limited of 5th Floor, 80 Old Street, London, EC1V 9AZ.**

Corndel has 30 days to respond to any Data Rights requests.

If we receive a request via telephone, we will only disclose personal data if the following conditions are met:

- We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
- We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked over the phone.

Use of Cookies

A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both "session" cookies and "persistent" cookies on the website and they are used for purposes including tracking visitor use of the website; recognising you whenever you visit this website; obtaining information about your preferences, online movements and use of the internet; carrying out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor requirements and interests; targeting our marketing and advertising campaigns more effectively; and making your online experience more efficient and enjoyable.

Session cookies will be deleted from your computer (or other electronic device) when you close your browser. Persistent cookies will remain stored on your computer (or other electronic device) until deleted, or until they reach a specified expiry date.

We use the following cookies:

- **Strictly necessary cookies.** These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information, but you may then not be able to access all or parts of our website.
- **Performance cookies.** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.
- **Functional cookies.** These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- **Targeting cookies.** These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

Third Party Cookies

We work with third party suppliers who may also set cookies on our website. These third-party suppliers are responsible for the cookies they set on our site. If you want further information, please go to the website for the relevant third party.

For example, we use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers (or other electronic devices). The information generated relating to our website is used to create reports about the use of the website. For example, the information will show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (e.g. how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had. Google will store this information. Google's privacy policy is available at: <https://policies.google.com/privacy>

Consent

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is required for the operation of our website, i.e. strictly necessary, as detailed further above.

There is a notice on the home page of our website which describes how we use cookies, as well as our cookie preference centre which enables you to opt-in to our use of non-essential cookies, such as performance, functional and tracking.

Choices about cookies

As set out above, when you first enter our website, you will be greeted with our cookie preference centre which allows you to opt-in to our use of non-essential cookies. If you want to change your preferences at any time, our website displays a cookies icon at the bottom left-hand corner of our website, which you can click on and change your preferences. You can choose which analytical, functional and targeting cookies we can set by clicking on the button(s):

Strictly necessary cookies	Always Active
Analytical or performance cookies	Off
Functionality cookies	Off
Targeting cookies	Off
You can also choose "Reject All" 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 website.

For further information about cookies and how to disable them please go to:

www.aboutcookies.org or www.allaboutcookies.org

Privacy policies of other websites

Corndel's website contains links to other websites. This Policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to this Policy

Corndel keeps its privacy policies under regular review, including this Policy. You will always be viewing the latest version.

How to contact us

If you have any questions about this Policy, the personal data we hold about you, or you would like to exercise any of your legal rights, please do not hesitate to contact us.

Email: gdpr@corndel.com

Call: 020 8102 9040

Or write to us at: The Data Protection Officer, Corndel Limited, 5th Floor, 80 Old Street, London, EC1V 9AZ.