

Privacy & Cookie Policy

Effective date: 20 January 2021

Wadham College of Science Trading as Exam Success Club. Exam Success Club (“us”, “we”, or “our”) operates the <https://www.examsuccessclub.com> website (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://www.examsuccessclub.com/terms-conditions>

We take your privacy very seriously. We have put in place measures to ensure that any personal information or data that we obtain from you is processed in accordance with the accepted principles of good information handling and relevant laws and regulations such as data protection, GDPR, and so on.

Definitions

Service

Service is the <https://www.examsuccessclub.com> website operated by Exam Success Club.

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection & Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally, identifiable information may include, but is not limited to:

- Email address (username) and password
- First name and last name
- Phone number
- The school you attend and subjects you study
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Usage Data

We may also collect information how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Learning Data

We collect information on your learning experience during use of the Service (“Learning Data”). This Learning Data may include information such as quiz question responses,

confidence in quizzes, the time you spend on different learning activities, timestamps of when the learning activity was completed and other learning related data.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of Data

Exam Success Club uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information
- To complete scientific research studies in relation to our Service, cognitive science, education or related research areas

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Exam Success Club legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Exam Success Club may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

For example, we process your email address and password as that allows you to have a unique account on Exam Success Club in which to use and benefit from our Service. In this case, we are processing this data in order to perform our contract with you. If the contract is terminated, you are able to request us to stop processing and remove this data.

We also ask your name so that we can address you in a personal way, improving your experience of the Services. In this case, you have given us permission to use this data by agreeing to our Terms and Privacy Policy and supplying the information. You can withdraw your consent at any time whilst still being able to use our Service.

We ask for your phone number so that we can assist you with onboarding to ensure you get the most benefit from our Service.

We ask for your school so that we can understand the demographics of our customers. It may also be used to help us identify which schools we should approach based on demand from their students for our Service, in order to distribute our Service to where it is needed and demanded the most. We will not share any of your Personal Information with schools when we do this, it just allows us to structure our approach. In this case, you have given us permission to use this data by agreeing to our Terms and Privacy Policy and supplying the information. You can withdraw your consent at any time whilst still being able to use our Service.

The Learning Data we collect is for two purposes: firstly, to perform our contractual obligation to you, to provide the learning experience Service. Secondly it is used to improve our Services for all users, including you. In this case, the processing is in our legitimate interests and it's not overridden by your rights.

Finally, we may process data for the purpose of education research that will help improve our Service but also similar services and learner outcomes across the world. This has a significant benefit to wider society, especially in an area as important as education. Personal identifiers are removed from the data before it is used for such purposes.

Retention of Data

Exam Success Club will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Exam Success Club will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there. The reverse may also be true: if you are located inside United Kingdom and choose to provide information to us, please note that we may transfer the data, including Personal Data, to other locations in Europe and outside of Europe and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to these transfers.

Exam Success Club will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

There are specific circumstances where we may disclose data. We do not disclose data about identifiable individuals to other companies not listed in this privacy policy, unless we have gained your explicit consent to do so. However, we may provide aggregated information about our users that does not include any Personal Information to other organisations.

Business Transaction

If Exam Success Club is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Disclosure for Law Enforcement

Under certain circumstances, Exam Success Club may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Legal Requirements

Exam Success Club may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Exam Success Club
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Exam Success Club aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data, we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Exam Success Club relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Heap Analytics

Heap Analytics is a web analytics service offered by Heap Analytics that tracks and reports website traffic. For more information on their privacy practices please visit their terms here: <https://heapanalytics.com/privacy>

Inspectlet

Inspectlet is a web analytics service offered by Inspectlet that tracks and reports website traffic. It is used to improve the service we provide. For more information on their privacy practices please find their terms here: <https://www.inspectlet.com/legal#privacy>

Behavioural Remarketing

Exam Success Club uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

Facebook

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

AdRoll

AdRoll is a marketing service that provides targeted advertising and marketing services for us. You can find more information about the privacy practices and policies on their website here: <https://www.adrollgroup.com/en-GB/privacy>

Website Service

We may use third-party Service Providers to ensure our website is secure and reliable in order to provide our Service.

Cloudflare

Cloudflare provides a service that speeds up and protects our website in order to provide a secure and reliable Service. Traffic to our website goes through their network in order to ensure it is legitimate traffic (actual users) and not malicious traffic (bots/attacks). In addition, they provide services such as data compression to speed up the load time our website. They also provide a content delivery network which means that when you access pages and content, it is served from a location that is physically nearer to you, in order to provide faster load times. For more information on the privacy practices of Cloudflare, please visit their privacy policy: <https://www.cloudflare.com/privacypolicy/>

Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g., payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

Braintree

Their Privacy Policy can be viewed at

<https://www.braintreepayments.com/gb/legal/braintree-privacy-policy>

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Children's Privacy

Our Service may sometimes address users under the age of 18 ("Children"). All content and communications are suitable for users under the age of 18.

We treat the Personal Information of all our users very seriously and all the policies and rights mentioned above apply in the same way to Children's Personal Information. In addition, if you are a parent or guardian and you are aware that your Children has provided us with Personal Data, you may request for us to remove this Personal Data and/or end contractual services with your Children. Please note that we may ask you to verify your identity before responding to such requests.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: hello@wcosci.com