

Purpose of this document

This Privacy Policy explains how the companies within the Darwin Education Group collect, use, share and protect your personal data. For the purposes of this Privacy Policy, "Group Companies" means the companies forming part of the Darwin Education Group from time to time, as listed at [Group Companies](#).

Depending on how you interact with us, the relevant data controller will be the specific Group Company with which you have a relationship (for example, the company providing your course, educational programme, event, certification, digital service or other offering).

A current list of the Darwin Education Group companies is available here: [Group Companies](#). The list of Group Companies may be updated from time to time to reflect acquisitions, disposals, reorganisations or other changes within the Darwin Education Group.

Areas of the GDPR addressed

The following articles of the GDPR are addressed by this document:

Chapter II – Principles

Chapter III – Rights of the data subject

General Guidance

In this Privacy Policy, we explain how we collect your personal data, how and for what purposes we may use your personal data, to whom your personal data may be disclosed, how long we will keep your data and how we protect your personal data.

Further, this Privacy Policy includes important information regarding your rights in relation to the processing of your personal data, including your rights to access, update and correct your personal information, your rights to object, your rights to opt-out of marketing communications and your right to withdraw consent (where consent has been provided).

Therefore, we encourage you to read this Privacy Policy carefully.

From time to time, we may need to update this Privacy Policy. The most recent version will be available on the relevant website through which you interact with us, as well as on the websites of the Darwin Education Group companies. You may also request a copy of the most recent version from us at any time.

Attention: By using our products, services and our website and by sharing your personal data with us, you acknowledge that your personal data will be processed in the manner described in this Privacy Policy.

Note: this does not constitute your 'consent' to the processing of your personal data. We do not process your personal data on the basis of your consent, unless specifically indicated.

1. WHO ARE WE?

We operate through a number of companies across different jurisdictions within the Darwin Education Group and under a variety of brands.

The specific legal entity responsible for your personal data will depend on the services you receive, your location and the website, platform or programme with which you interact.

In the context of our activities, we collect, hold, disclose and otherwise process personal data relating to individuals with whom we interact. This may include customers, delegates, learners, website users, employees, contractors, collaborators, suppliers and other business contacts.

A current list of the Darwin Education Group companies is available here: [Group Companies](#).

The Group Companies may act as independent data controllers and may share personal data between them where permitted by applicable law and in accordance with this Privacy Policy.

The relevant Group Company acting as data controller will generally be identified in the applicable contract, booking form, registration page, website, platform or communication through which you interact with us.

2. YOUR PRIVACY IS IMPORTANT TO US

We are committed to protecting your personal data and respecting your privacy in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR), the UK GDPR and any other relevant local legislation in the jurisdictions in which we operate.

We recognise that the responsible handling of personal data is essential to maintaining your trust and to the proper operation of our business.

We process your personal data in a manner that is:

- fair, lawful and transparent;
- limited to specific and legitimate purposes;
- adequate, relevant and not excessive;
- accurate and kept up to date;
- retained only for as long as necessary; and
- protected by appropriate technical and organisational security measures.

3. WHOSE PERSONAL DATA DO WE COLLECT?

In the context of our activities, we may collect and process personal data relating to a range of individuals, including:

- customers, delegates and participants in our training programmes;
- users of our websites, learning platforms and digital tools;
- prospective customers and individuals who have expressed an interest in our services;
- current, former and prospective employees, contractors and collaborators;
- business partners, suppliers and service providers; and
- other individuals who interact with us in a professional or business context.

4. HOW DO WE COLLECT PERSONAL DATA RELATING TO YOU?

We may collect personal data about you in a number of ways, including:

- Directly from you, for example when you:
 - register for a course or event;
 - use our websites, learning platforms or digital tools;
 - communicate with us (including by email, phone or through online forms);
 - subscribe to receive communications from us; or
 - participate in training sessions or other activities.
- Automatically, when you use our websites or platforms, including through the use of cookies and similar technologies (please see our Cookie Policy for more information).
- From publicly available sources, such as professional networking platforms (e.g. LinkedIn) or publicly accessible company websites, where this is relevant to our business activities.
- From third parties, including:
 - business partners, collaborators or organisations with whom you are affiliated;
 - other companies within the Darwin Education Group; and
 - service providers acting on our behalf.

5. WHAT PERSONAL DATA DO WE COLLECT

The personal data we collect depends on the nature of your relationship with us. This may include:

- **Identification and contact details**
Such as your name, email address, telephone number, postal address and other contact details.
- **Professional information**
Such as your job title, employer, professional registration details (e.g. licence or college number), and areas of professional interest.
- **Account and communication data**

Such as your preferences, subscriptions, communication history with us, and any information you provide when contacting us or interacting with our platforms.

- **Training and participation data**

Such as course registrations, attendance records, progress, assessments, and participation in training sessions.

- **Audio-visual data**

Such as recordings of training sessions (including webinars and in-person sessions), where you may be identifiable through your image, voice or contributions.

- **Technical and usage data**

Such as information about how you use our websites, learning platforms and digital tools (including interactions with chatbot functionality), IP address, device information and cookie data.

- **Financial and transactional data**

Such as billing information, payment details and transaction history, where relevant.

6. FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

We may process your personal data for the following purposes:

- **Provision of services**

To deliver and manage our training programmes, courses and related services, including registration, administration, assessment and certification.

- **Communication**

To communicate with you in relation to your participation in our programmes, respond to your queries, and provide relevant updates.

- **Marketing and business development**

To provide you with information about our training programmes, services, offers and events that may be relevant to your professional interests.

This may include communications about programmes, services and events offered by other companies within the Darwin Education Group, where such programmes are related to your previous engagement or expressed interests.

- **Improvement and development**

To analyse usage, improve our services, develop new programmes, and enhance user experience across our platforms.

- **Training delivery and learning support**

To provide interactive learning tools (including AI-powered chatbot functionality) and to support your learning experience.

- **Recording and reuse of training content**

To record training sessions (including online and in-person sessions) for educational, quality and training purposes, and to make such recordings available to participants or future learners, subject to appropriate safeguards.

- **Compliance and legal obligations**

To comply with applicable laws and regulations, including data protection, financial and regulatory requirements.

- **Security and fraud prevention**

To protect our systems, users and business from fraud, unauthorised access or other risks.

We process your personal data on one or more of the following legal bases:

- **Performance of a contract**, where processing is necessary to provide our services to you;
- **Legitimate interests**, including:
 - providing relevant training opportunities;
 - maintaining and developing our relationship with you;
 - improving our services and business operations;
 - supporting the administration, management and development of the Darwin Education Group and its companies;
- **Legal obligations**, where we are required to process your data by law;
- **Consent**, where required by law (for example, for certain types of marketing communications).

Where we rely on legitimate interests, we ensure that these are not overridden by your rights and freedoms.

7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with the following categories of recipients:

Companies within the Darwin Education Group

We may share your personal data with other companies within the Darwin Education Group where this is necessary for:

- the provision and administration of educational programmes, events, certifications and related services;
- customer relationship management;
- internal administration and group management;
- finance, accounting and treasury functions;
- human resources management;
- legal, regulatory and compliance purposes;
- internal audit, governance and risk management activities;
- information technology, cybersecurity and systems administration;
- data analytics, reporting and business intelligence activities;
- marketing and promotion of relevant programmes, services and events; and
- any other legitimate business purposes consistent with applicable data protection laws.

Where appropriate, Group Companies may act as independent controllers of your personal data. As a group of companies operating across multiple jurisdictions and educational sectors, certain functions may be provided on a centralised basis for the benefit of the Darwin Education Group. This may require the sharing of personal data between Group Companies in order to support the efficient operation, management, governance and development of the Group and its services.

International transfers

As a global organisation, your personal data may be transferred to and processed in countries outside the European Economic Area (EEA) and the United Kingdom.

Where this occurs, we ensure that appropriate safeguards are in place, such as:

- adequacy decisions;
- standard contractual clauses; or
- other legally recognised mechanisms.

8. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We retain your personal data only for as long as necessary for the purposes for which it was collected, as described in this Privacy Policy.

In general:

- **Customer and transactional data**

We retain personal data related to your participation in our services (including bookings, payments and invoices) for the duration of our relationship with you and for a period of up to seven (7) years thereafter, in line with applicable legal, tax and accounting requirements.

- **Training and learning records**

We retain information relating to your participation in training programmes (such as course registrations, attendance, progress and completion history) for as long as necessary to:

- maintain an accurate record of your learning history;
- support your ongoing professional development;
- provide relevant training recommendations; and
- respond to requests from you or third parties (such as employers or accreditation bodies).

Given the nature of professional training and continuing education, such records may be retained for an extended period, where this is appropriate and proportionate.

- **Marketing data**

We retain your personal data for marketing purposes until you opt out or withdraw your consent, or where we no longer have a lawful basis to continue such processing.

- **Technical and usage data**

We retain technical and usage data for as long as necessary for operational, security and analytical purposes.

We may retain personal data for longer periods where this is necessary to comply with legal obligations or to establish, exercise or defend legal claims.

9. HOW DO WE PROTECT YOUR PERSONAL DATA?

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, misuse, alteration or disclosure.

These measures are designed to ensure a level of security appropriate to the risks associated with the processing of your personal data and may include:

- access controls and user authentication;
- data security and confidentiality measures;
- regular monitoring and testing of our systems; and
- internal policies and procedures governing the handling of personal data.

We also require our employees, contractors and service providers to comply with appropriate data protection and confidentiality obligations.

While we take reasonable steps to protect your personal data, please note that no system can be completely secure.

10. What are your rights and how you can exercise them?

You have certain rights in relation to your personal data, subject to applicable law. These include:

- **Right of access** – to request information about the personal data we hold about you.
- **Right to rectification** – to request that inaccurate or incomplete personal data is corrected.
- **Right to erasure** – to request the deletion of your personal data in certain circumstances.
- **Right to restriction** – to request that we limit the processing of your personal data in certain situations.
- **Right to object** – to object to the processing of your personal data where we rely on legitimate interests.
- **Right to data portability** – to receive your personal data in a structured, commonly used and machine-readable format, where applicable.

(a) Marketing communications

You have the right to object at any time to the use of your personal data for direct marketing purposes. You can do so by:

- clicking the “unsubscribe” link in our communications; or
- contacting us using the details below.

(b) How to exercise your rights

If you wish to exercise any of your rights, please contact us at:

gdpr@improveinternational.com

We may need to verify your identity before responding to your request.

(c) Complaints

If you are not satisfied with how we process your personal data, you have the right to lodge a complaint with the relevant data protection authority in your jurisdiction.

Finally, you have the right to lodge a complaint concerning any company within Darwin Education Group with the local data protection authority of that company, relating to the processing of your personal data by us.

11. Use of cookies and similar technologies

We use cookies and similar technologies on our websites and digital platforms to ensure they function properly, to improve your user experience, and to analyse how our services are used.

Cookies are small text files that are stored on your device when you visit a website. Some cookies are necessary for the operation of our websites, while others help us to enhance performance and provide personalised content.

Where required by law, we will obtain your consent before placing non-essential cookies on your device.

For more detailed information about the cookies we use, the purposes for which we use them, and how you can manage your preferences, please refer to our **Cookie Policy**.

12. Contact

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your personal data, please contact us at:

gdpr@improveinternational.com

We may direct your request to the appropriate entity within the Darwin Education Group in order to respond effectively.

You may also contact the relevant entity with which you have a relationship. Details of the entities are available here: [Group Companies](#).