

Inflection Point Intelligence Limited Privacy Policy

Last updated: September 2022

1) Our contact details

E-mail: info@ipi-edu.com

2) The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics eg
 - Name
 - Email address
 - Location
- Education-related data eg
 - Website usage information
 - Course quiz answers and progress

3) How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You want to register in our Learning Management System
- You want us to be able to communicate with you

We also receive personal information indirectly, from the following sources in the following scenarios:

- If you are registered under a Corporate Licence, we may receive your name, email address and location from the Corporate Licensee

We use the information that you have given us in order to

- Register you in our Learning Management System
- Register you in the IPI Professional Network and our CRM
- Communicate with you about your courses
- Respond to your comments or inquiries
- Track your progress in your courses
- Provide customer support
- Analyze and improve our products and services
- Solicit feedback about our products and services
- Communicate with you about further opportunities with regard to our products and services.

4) Legal Basis For Processing

Under the EU and UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting info@ipi-edu.com
- (b) We have a contractual obligation, either with you directly or with your Corporate Licensee.
- (f) We have a legitimate interest to
 - analyze and improve our business, including our products
 - communicate with you, provide support and enable you to provide feedback.

5) Disclosure of Information

Commonly owned entities. We may share your personal data with companies under common ownership or control of IPI, including our holding company, affiliates and subsidiaries. This processing is based on our legitimate interest to transmit personal data within the group for internal administrative purposes, such as for the purposes of alignment of business operations and providing our Products.

- **Third-party service providers.** We may share your personal data with authorised third-party service providers for the sole purpose of providing you with our Products. For example, we may share information with
 - Our academic partners (eg Henley Business School)
 - Your Corporate Licensee.

As required by law. In certain circumstances, we may be required to disclose information, including personal data, for example, we may need to comply with legal or regulatory processes (such as a judicial proceeding, court order, or government inquiry).

Change of Control. We may share information about you in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company. In the event that information is shared in this manner, notice will be posted on our website at www.ipi-edu.com.

6) Retention of Information.

We retain personal data we collect where we have an ongoing legitimate need to do so. When we have no ongoing legitimate need to process your personal data, we will either delete or anonymize it.

- We will retain your consumer data for account management purposes until you delete your account (or its content).
- The data about our corporate customers for purposes of contract management and customer relationship will be retained during our customer relationship and in accordance with applicable accounting and tax laws.
- Technical and usage data collected for analytics and product improvement purposes will be retained for a reasonable amount of time from the collection of data.
- Interaction data will be processed as long as the inquiry/support case has been solved.

Data may be retained for a longer period if we are legally obliged to do so, or if retention is necessary to establish, exercise or defend legal claims.

7) Security of Your Information.

We take reasonable steps to help protect your personal data in an effort to prevent unauthorised access, use, or disclosure.

Despite these measures, you should know that we cannot fully eliminate security risks associated with personal data. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee absolute security. Any content you post or input you provide while using our Products is at your own risk.

8) Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.



Please contact us at info@ipi-edu.com if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at info@ipi-edu.com.

You have the right to complain to your local data protection authority within the EU (or the ICO if you are based in the UK) if you are unhappy with our data protection practices. (Art. 77 of GDPR).