



Privacy Policy

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1.0 Introduction

1.1 We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

1.2 This website privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Transfer of your information out of the UK and EEA
- Cookies and similar technologies
- Marketing
- Your rights
- Keeping your personal information secure
- How to complain
- Changes to this website privacy policy
- How to contact us

2.0 Who we are

2.1 We are the Cambridge Centre for Evidence-Based Policing Ltd., a company registered in England and Wales under the Company Number: 08660094.

Our Registered Office is at: Salisbury House, Station Road, Cambridge, CB1 2LA, United Kingdom.

Our VAT Number is: GB193651976.

We are registered with the Information Commissioner's Office with the Reference Number: ZA524689.

2.2 This website is operated by the Cambridge Centre for Evidence-Based Policing Ltd. We are a research and training consultancy, which applies research evidence to improve policing practices worldwide. For more information, please see <https://www.cambridge-ebp.co.uk/about>.

2.3 We collect, use and are responsible for certain personal information about you. When we do so, we are regulated under the General Data Protection Regulation, which applies across the European Union, and the UK Data Protection Act 2018; and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

3.0 Our website

3.1 This privacy policy relates to your use of our website: <https://www.cambridge-ebp.co.uk/>. Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

4.0 Our collection and use of your personal information

4.1 We collect personal information about you when you access our website, register for a course with us, contact us, send us feedback, sign up to a mailing list, purchase courses via our website, post material to our website and complete customer surveys via our website. We collect this personal information from you either directly, such as when you register for a course with us, contact us or purchase courses via our website, or indirectly, such as your browsing activity while on our website (see ‘Cookies’ below).

4.2 The personal information we collect about you depends on the particular activities carried out through our website. This information includes:

- Your name, address and contact details;
- Date of birth and nationality;
- Bank account and payment details;
- Details of any feedback you give us by phone, email, post or via social media;
- Information about the services we provide to you;
- Your account details, such as username, login details;
- Your place of work.

4.3 We use this personal information to:

- Create and manage your account with us;
- Verify your identity;
- Provide services to you;
- Communicate with you, including marketing material that you have opted in to receive;
- Customise our website and its content to your particular preferences;
- Notify you of any changes to our website or to our services that may affect you;
- Improve our services.

4.4 This website is not intended for use by children, and we do not knowingly collect or use personal information relating to children.

5.0 Our legal basis for processing your personal information

5.1 When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

5.2 The legal bases we may rely on include:

- **Consent:** where you have given us clear consent for us to process your personal information for a specific purpose;
- **Contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- **Legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations);
- **Vital interests:** where our use of your personal information is necessary to protect you or someone else's life;
- **Public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law;
- **Legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

5.3 Further information—the personal information we collect, when and how we use it

For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

When information is collected	What information we ask for	How and why we use your information
When you register for a course with us	<p>Contact details:</p> <p>Your name;</p> <p>Your email address;</p> <p>The organisation you work for.</p>	<p>We ask for this:</p> <ul style="list-style-type: none"> - To create and manage your account with us; - To communicate with you about your account; - To assess if the course is suitable for you; - To deliver a course to you and assess if you have passed or failed the course. <p>We rely on consent as the lawful basis for collecting and using your personal information.</p> <p>We will keep this information:</p> <ul style="list-style-type: none"> - For as long as you remain subscribed (have positively opted-in) in our mailing list and wish to receive news from us. - If you have not opted in, we will keep your data for maximum period of two years following your initial registration.
When payment is received for a course with us	<p>Payment method:</p> <p>Bank account;</p> <p>Payment details.</p>	<p>We ask for this:</p> <ul style="list-style-type: none"> - To provide access to the course; - To process a payment or refund. <p>We rely on contract as the lawful basis for collecting and using your personal information.</p>

When information is collected	What information we ask for	How and why we use your information
		<p>We will keep this information until:</p> <ul style="list-style-type: none"> - We close your account; - The contract ends.
<p>When you take an assessment for an online course with us</p>	<p>Passport identification:</p> <p>Your name;</p> <p>Date of birth;</p> <p>Nationality.</p>	<p>We ask for this:</p> <ul style="list-style-type: none"> - To verify your identity; - To protect the integrity of the graduation certificates. <p>We rely on contract as the lawful basis for collecting and using your personal information.</p> <p>We will keep this information:</p> <ul style="list-style-type: none"> - On file until you have passed the assessment and we have issued your graduation certification. - On your graduation certificate for a maximum period of two years following the date we issued your graduation certificate.
<p>When you provide feedback to us</p>	<p>Your name;</p> <p>Your email address;</p> <p>The organisation you work for.</p>	<p>We ask for this:</p> <ul style="list-style-type: none"> - To improve services provided. <p>We rely on consent as the lawful basis for collecting and using your personal information.</p> <p>We will keep this information until:</p> <ul style="list-style-type: none"> - For as long as you remain subscribed (have positively opted-in) in our mailing list and wish to receive news from us. - If you have not opted in, we will keep your data for maximum period of two years

When information is collected	What information we ask for	How and why we use your information
		following your initial registration.

6. Who we share your personal information with

6.1 We routinely share your name, email address and the organisation you work for with LearnWorlds (<https://www.learnworlds.com>). This data sharing enables us to create a learner account for the online courses.

6.2 We will share personal information with law enforcement or other authorities if required by applicable law.

6.3 We will not share your personal information with any other third party.

7.0 Whether information has to be provided by you, and if so why

7.1 We require you to provide your name, email address and the organisation you work for to enable us to register you for an online course and provide that course to you via the LearnWorlds platform. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

8.0 Transfer of your information out of the UK and EEA

8.1 We do not intend to transfer your personal data outside of the United Kingdom and the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

9.0 Cookies and other tracking technologies

9.1 A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

9.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

- **Strictly Necessary Cookies:** A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.
- **Analytics Cookies:** It is important for Us to understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you

use. Analytics Cookies enable us to gather this information, helping Us to improve Our Site and your experience of it.

- **Functionality Cookies:** Functionality Cookies enable Us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.
- **Marketing/Targeting Cookies:** It is important for Us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests. Some information gathered by targeting Cookies may also be shared with third parties.
- **Third Party Cookies:** Third party Cookies are not placed by Us; instead, they are placed by third parties that provide services to Us and/or to you. Third party Cookies may be used by advertising services to serve up tailored advertising to you on Our Site, or by third parties providing analytics services to Us (these Cookies will work in the same way as analytics Cookies described above).
- **Persistent Cookies:** Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.
- **Session Cookies:** Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

9.3 Before Cookies are placed on your computer or device, you will be shown a banner requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies unless those Cookies are strictly necessary; however certain features of Our Site may not function fully or as intended

9.4 How to disable cookies

Your browser will have an option you may select that will block Cookies. Below are links to information about popular browsers and how to block Cookies using them.

- Firefox

<https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectlocale=en-US&redirectslug=Enabling+and+disabling+cookies>

- Internet Explorer

<https://support.microsoft.com/en-gb/hub/4230784/internet-explorer-help>

- Google Chrome

https://support.google.com/chrome/answer/95647?hl=en&p=cpn_cookies

- Safari

<https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

- Other browsers: see the Information Commissioner’s Office’s website

<https://ico.org.uk/your-data-matters/online/cookies/>

9.5 Functional and Required Cookies

Name	Type	Duration	Purpose
Crumb	Cookie	Session	Prevents cross-site request forgery.
siteUserCrumb	Cookie	3 years	Prevents cross-site request forgery for logged in site users.
RecentRedirect	Cookie	30 minutes	Prevents redirect loops if a site has custom URL redirects.
CART	Cookie	2 weeks	Shows when a visitor adds a product to their cart.
hasCart	Cookie	2 weeks	Shows when a visitor has a cart.
Locked	Cookie	Session	Prevents the password-protected screen from displaying if a visitor enters the correct site-wide password.

SiteUserInfo	Cookie	3 years	Identifies a visitor who logs into a customer account.
SiteUserSecureAuthToken	Cookie	3 years	Authenticates a visitor who logs into a customer account.
Commerce-checkout-state	sessionstorage	Session	Stores state of checkout while the visitor is completing their order in PayPal.
squarespace-popup-overlay	localstorage	Persistent	Prevents a promotional pop-up from displaying if a visitor dismisses it.
squarespace-announcement-bar	localstorage	Persistent	Prevents an announcement bar from displaying if a visitor dismisses it.
ss_sd	Cookie	Session	Ensures that visitors remain authenticated during their sessions.
Test	Cookie	Session	Investigates if the browser supports cookies and prevents errors.
squarespace-likes	localstorage	Persistent	Shows when a visitor already liked a blog post.
CHECKOUT_WEBSITE	Cookie	Session	Identifies the correct site for checkout.

9.6 Analytics and Performance Cookies

Cookie Name	Duration	Purpose
ss_cid	2 years	Identifies unique visitors and tracks a visitor's sessions on a site.
ss_cvr	2 years	Identifies unique visitors and tracks a visitor's sessions on a site.
ss_cvisit	30 minutes	Identifies unique visitors and tracks a visitor's sessions on a site.
ss_cvt	30 minutes	Identifies unique visitors and tracks a visitor's sessions on a site.
ss_cpvisit	2 years	Identifies unique visitors and tracks a visitor's sessions on a site.
ss_cookieAllowed	30 days	Remembers if a visitor agreed to placing Analytics cookies on their browser if a site is restricting the placement of cookies.

10. Marketing

10.1 We would like to send you information about future courses and events which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email and telephone.

10.2 We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes when you register for a course or mailing list via our website.

10.3 If you have previously agreed to being contacted in this way, you can unsubscribe at any time by contacting us at chief@cambridge-ebp.co.uk. It may take up to 14 days for this to take place.

10.4 Where you have subscribed to receive marketing communication from us, we will ensure the volume is not excessive. For more information on your rights in relation to marketing, see 'Your rights' below.

11. Your rights

11.1 Under the General Data Protection Regulation and UK Data Protection Act 2018, you have a number of important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your personal information;
- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure of personal information concerning you in certain situations;
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- Object at any time to processing of personal information concerning you for direct marketing;
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal information;
- Otherwise restrict our processing of your personal information in certain circumstances.

11.2 For further information on each of those rights, including the circumstances in which they apply, see the <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

11.3 If you would like to exercise any of those rights, please:

- Email us;
- Let us have enough information to identify you;
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know the information to which your request relates.

12.0 Keeping your personal information secure

12.1 We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

12.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

12.3 If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

13. Deleting your personal information

13.1 We will keep your personal information for a maximum of two years from your first registration with us unless you have opted in to continue to receive communication from us.

13.2 You can opt out of this communication at any time by emailing chief@cambridge-ebp.co.uk.

14.0 How to complain

14.1 We hope that we can resolve any query or concern you raise about our use of your information. The General Data Protection Regulation and UK Data Protection Act 2018 also gives you the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint/>.

15.0 Changes to this website privacy policy

15.1 This website privacy policy was published on 01.06.2020 and last updated on 01.06.2020. We may change this website privacy policy from time to time, when we do, we will inform you via email.

16.0 How to contact us

16.1 Please contact us if you have any questions about this Privacy Policy or the information we hold about you.

16.2 If you wish to contact us please send an email to chief@cambridge-ebp.co.uk.

