



the occupational
psychology centre



opc assessment

Website Privacy Notice

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Contents

1.	What is the purpose of this document?	2
2.	Data we collect about you	2
3.	How is your personal data collected?	4
4.	Sharing your information	5
5.	Data security	5
6.	How long will we keep your personal information for?	6
7.	Your rights	6



"We" are the Occupational Psychology Centre Limited and OPC Assessment Limited. The Occupational Psychology Centre Limited is a company registered in England and Wales with company number 3081548 and OPC Assessment Limited is a company registered in England and Wales with company number 4026260; both companies are registered at One Wellstones, Watford, Herts WD17 2AE. Our contact details are admin@theopc.co.uk.

1. What is the purpose of this document?

- 1.1 We are committed to protecting and respecting your privacy. This privacy notice sets out the basis on which any personal data we collect about users of our website at www.theopc.co.uk (our **site**) and how that information will be processed by us.
- 1.2 This privacy notice applies to: visitors to our site who do not register as well as those who do; any customers or clients (or their representatives) who purchase our goods and/or services (including tests) from us via our site or otherwise; and all individual contractors and service providers (or their representatives) who provide services to our business (**you**).
- 1.3 We are a **data controller**. This means that we are responsible for deciding how we hold and use personal information about you, and for explaining this clearly to you.
- 1.4 We have appointed a data protection lead (DPL) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPL using the details set out above.

2. Data we collect about you

- 2.1 Personal data, or personal information, means any information about an individual from which that person can be identified from that or in conjunction with any other data. It does not include data where the identity has been removed and cannot be identified from that or in conjunction with any other data (anonymous data).
- 2.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity and Contact Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender, billing address, delivery address, email address and telephone numbers.

We use this to:

Register you (or the organisation or business you represent) as a new customer or client or as a new supplier, to respond to your contact with us or where you have an enquiry, to process and deliver your order, to manage our relationship with you, to administer and protect our business and our site, to deliver relevant newsletter and website content and advertisements to you.

Our lawful basis for processing is a) Performance of a contract with you and (b) Necessary for our legitimate interests (to enter into a contract with the organisation or business you represent, for running our business).

Financial Data includes bank account and payment card details and details about payments to and from you and other details of products and services (including tests) you have purchased from us.



We use this to:

To process and deliver your order, manage payments, fees and charges, collect and recover money owed to us.

Our lawful basis for processing (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us).

Technical Data includes 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, and other technology on the devices you use to access this website and includes information about how you use our website, products and services.

We use this to:

To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to use data analytics to improve our site, products/services, marketing, customer relationships and experiences,

Our lawful basis for processing is (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise and to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy) and (b) Necessary to comply with a legal obligation.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We use this to:

To make suggestions and recommendations to you about goods or services (or test) that may be of interest to you.

Our lawful basis for processing this is that it is necessary for our legitimate interests (to develop our products/services and grow our business and to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

2.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

2.4 As part of our usual course of business via the website, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However, we may process information;

2.4.1 relating to a health condition or disability in order to meet our legal obligation to make reasonable adjustments in the provision of our services;



- 2.4.2 where it is necessary to establish, exercise or defend a legal claim;
- 2.4.3 where you have manifestly made the information public; or
- 2.4.4 otherwise with your explicit consent.

3. How is your personal data collected?

- 3.1 We use different methods to collect data from and about you including through the following ways in this paragraph.
- 3.2 **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by communicating or corresponding with us in person or by post, phone, email or otherwise. This includes personal data you provide when you:
 - 3.2.1 apply to receive our products or services (including tests);
 - 3.2.2 create an account with us;
 - 3.2.3 take online tests;
 - 3.2.4 subscribe to our publications;
 - 3.2.5 request marketing to be sent to you;
 - 3.2.6 give us feedback, make a complaint or contact us.
- 3.3 **Automated technologies or interactions.** As you interact with our site, we will automatically collect Usage and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
- 3.4 **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
 - 3.4.1 Technical Data from analytics providers such as Google;
 - 3.4.2 Financial and Transaction Data from payment and delivery services;
- 3.5 **Automated decision-making**
 - 3.5.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.
 - 3.5.2 As a general user of our site, no serious decisions will be taken about you using automated means.
- 3.6 **Marketing**
 - 3.6.1 You will receive marketing communications from us if you have requested information from us or purchased products from us and you have not opted out of receiving that marketing.
 - 3.6.2 Our marketing emails may contain embedded pixels so that we can understand whether it was of interest to you.
 - 3.6.3 You can ask us to stop sending you marketing messages at any time.



3.7 Third-party marketing

3.7.1 We do not share personal data with third parties for marketing.

4. Sharing your information

4.1 We share your personal information with third party contractors and service providers to the extent necessary to fulfil your order.

4.2 We share your information with other third parties as follows:

4.2.1 our regulators, professional advisors, insurance provider and auditors;

4.2.2 HMRC or other government or law enforcement agencies;

4.2.3 if we sell any business or assets, in which case we may disclose your personal information to the prospective buyer of such business or assets;

4.2.4 payment service providers when you purchase products via the website;

4.2.5 if we have a legal obligation to do so; and

4.2.6 for the purposes of fraud protection and credit risk reduction.

4.3 The categories of third parties listed above use your personal data for their own purposes and are responsible for their own compliance with data protection legislation.

4.4 We also share your data with third-party service providers who provide services to our business, such as our website host server, IT support and maintenance service, cloud storage provider and email exchange server, delivery services and other businesses that provide certain services on our behalf. All of our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes.

5. Data security

5.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Transferring information outside the EEA

5.2 Any personal information that you submit to us will be held on secure servers, based within the UK and the European Economic Area (EEA).

5.3 If we are required to transfer your information outside the UK or EEA, we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

5.4 If you are based outside the UK or EEA, we may transfer personal information to the correspondence address you provide to us to the extent necessary to complete your order or provide you with a service. We will take all reasonable steps to ensure that such transfers are secure. By instructing us from outside the UK or EEA, you agree that such transfer is necessary for us to complete your order or provide you with a service.



- 5.5 We use Google Analytics to evaluate the performance of our site and improve the service we offer you. We may transfer information about you outside the UK or EEA for this purpose.

6. How long will we keep your personal information for?

- 6.1 We will 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 litigation in respect to our relationship with you.
- 6.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 6.3 We keep basic information about our clients or customers or our suppliers or their representatives (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients or customers or suppliers for tax purposes and for the purpose of any legal claims.
- 6.4 In some circumstances, you can ask us to delete your data: see your rights below for further information.
- 6.5 In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes; in which case, we may use this information indefinitely without further notice to you.

7. Your rights

- 7.1 You have the following rights:
- 7.1.1 to be told what we are doing with your personal information. We do this by providing you with this privacy notice;
 - 7.1.2 to correct or update the personal information we hold about you;
 - 7.1.3 to object to the processing of your personal information (in certain circumstances);
 - 7.1.4 to request a copy of the personal information we hold about you;
 - 7.1.5 to ask us to delete the information that we hold about you where there is no good reason for us continuing to process it;
 - 7.1.6 to ask us to stop processing your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground and where there is no good reason for us continuing to process it;
 - 7.1.7 to ask us to restrict how we use your personal information for a period of time if you claim that it is inaccurate and we want to verify the position or in some limited other circumstances;



- 7.1.8 to ask us to send your personal information to another organisation in a computer-readable format; and
- 7.1.9 to complain to the Information Commissioner's office if you are unhappy with our use of your personal data; you can do this at <https://ico.org.uk/concerns/>. Do contact us straight away if you consider that we are not handling your personal information properly so we can try and sort the problem out.
- 7.2 If we delete your personal information or restrict our use of it, we will not be able to provide our services to you.
- 7.3 If you want to exercise any of your rights, please contact us via: <https://theopc.co.uk/contact>. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).