

Pathways 21 (UK) Ltd Privacy Policy and Notice

This is the privacy notice of Pathways 21 (UK) Ltd. In this document, “we”, “our”, or “us” refer to Pathways 21 (UK) Ltd.

We are company number 05515231, registered in England.

Our registered office is at 33 Bernard Ashley Drive, London, SE7 7UB.

This is a notice to inform you of our policy about all information that we record about you. It covers both information that could identify you and information that could not.

We are extremely concerned to protect your privacy and confidentiality. We understand that all users of our web site are quite rightly concerned to know that their data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

Our policy is both specific and strict. It is based on a template from Net Lawman (www.netlawman.co.uk) that complies with UK law [and with the laws of all jurisdictions of which we are aware] and meets the additional guidelines set out by the UK Information Commissioner’s Office. If you think our policy falls short of your expectations or that we are failing to abide by our policy, **do please tell us**.

We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our web site immediately.

Except as set out below, we do not share, or sell, or disclose to a third party, any personally identifiable information collected at this site.

Here is a list of the information we collect from you, either through our web site or because you give it to us in some other way, and why it is necessary to collect it:

1. Business and personal information

This includes basic identification and contact information, such as your name and contact details and also includes all information given to us in the course of your business and ours, such as information you give us in your capacity as our client. We undertake to preserve the confidentiality of the information and of the terms of our relationship. It is not used for any other purpose. We expect you to reciprocate this policy.

This information is used:

- 1.1. to provide you with the services which you request;
- 1.2. for verifying your identity for security purposes;

- 1.3. for marketing our services and products;
- 1.4. information which does not identify any individual may be used in a general way by us or third parties, to provide class information, for example relating to demographics or usage of a particular page or service.

We keep information, which forms part of our business record for a minimum of six years. That is because we may need it in some way to support a claim or defence in court. That is also the period within which our tax collecting authorities may demand to know it.

2. Market place information

When we obtain information from you specifically to enable you to buy a service offered on our web site by some other person, we assume that in giving us your information, you are also giving us permission to pass it to the relevant person.

3. Your domain name and e-mail address

This information is recognised by our servers and the pages that you visit are recorded. We shall not under any circumstances, divulge your e-mail address to any person who is not an employee or contractor of ours and who does not need to know, either generally or specifically. This information is used:

- 3.1. to correspond with you or deal with you as you expect;
- 3.2. in a collective way not referable to any particular individual, for the purpose of quality control and improvement of our site;
- 3.3. to send you news about the services to which you have signed up;
- 3.4. to tell you about other of our services or services of sister web sites.

4. Information you post on our website

Information you send to us by posting to a forum or blog or in your advertisement, is stored on our servers. We do not specifically use that information except to allow it to be read, but you will see in our terms and conditions that we reserve a right to use it in any way we decide.

5. Website usage information

We may use software embedded in our website (such as JavaScript) to collect information about pages you view and how you have reached them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. We do not presently associate such information with an identifiable person.

6. Financial information relating to your credit cards

This information is never taken by us either through our website or otherwise. At the point of payment, you are transferred to a secure page on the website of [WorldPay / SagePay / PayPal / MoneyBookers] or some other reputable payment service provider. That page may be dressed in our “livery”, but it is not controlled by us. Our staff and contractors never have access to it.

7. Note on padlock symbols and other trust marks

Many companies offer certification and an icon or other small graphic to prove to site visitors that the site is safe. Some certify to a high level of safety. Others are more concerned to take our money than to provide a useful service. We do not handle information about your credit card so do not subscribe to any such service.

8. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

9. Third party advertising

Third parties may advertise on our web site. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects your IP address when they send an advertisement that appears on our site to your browser. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these

technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

10. Third party content

Our web site is a publishing medium in that anyone may register and then publish information about himself or some other person. We do not moderate or control what is posted. If you complain about any of the content on our web site, we shall investigate your complaint. If we feel, it may be justified, we shall remove it while we investigate. Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content which offends you. If we think, your complaint is vexatious or without any basis, we shall not correspond with you about it.

11. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we do receive data which is indirectly made up from your personal information, from software services such as Google Analytics and others. No such information is identifiable to you.

12. Content you provide to us with a view to be used by third party

If you provide information to us with a view to it being read, copied, downloaded, or used by other people, we accept no responsibility for what that third party may do with it. It is up to you to satisfy yourself about the privacy level of every person who might see your information. If it is available to all the World, neither we nor you have no control whatever as to how it is used.

13. Sending a message to our support system

When you send a message, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to provide to you the information you need. We record your request and our reply in order to increase the efficiency of our business / organisation. We do not keep any personally identifiable information associated with your message, such as your name or email address.

14. Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

15. Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

16. Re-marketing

We may use re-marketing from time to time. This involves Google or some other supplier placing a tag or marker on your website in order to be able to serve to you an advert for our products / services when you visit some other website.

17. Affiliate information

This is information given to us by you in your capacity as an affiliate of us or a customer or client of ours. Such information is retained for business use only. We undertake to preserve the confidentiality of the information and of the terms of our relationship. It is not used for any other purpose. We expect any affiliate to agree to reciprocate this policy. As an exception to this, we have the right to disclose your first name and URL of your affiliate connection to other affiliates and to any other person or organisation, on and off site. The reason is solely to enable us to mention winners and others whose performance as an affiliate is in some way outstanding.

18. Use of site by children

We do not market to children, nor do we sell products or services for purchase by children. We do sell products and services for end use by children, but for purchase by adults. If you are under 18, you may use our site only with consent from a parent or guardian.

19. Disclosure to Government and their agencies

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

20. Compliance with the law

This confidentiality policy has been compiled so as to comply with the law of every jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your country, we should like to hear from you, but ultimately it is your choice as to whether you wish to use our website.

21. Review or update personally identifiable information

At any time you may review or update the personally identifiable information that we hold about you, by contacting us at the address below. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

22. Removal of your information

If you wish us to remove personally identifiable information from our web site, you may contact us at http://www.pathways21.info/online_enq.asp

To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

23. Data may be “processed” outside the UK

Our web sites are hosted in the UK. We may also use outsourced services in countries outside the EU from time to time in other aspects of our business. Accordingly data obtained within the UK may be “processed” outside the UK and data obtained in any other country may be processed within or outside that country.

If you have any question regarding the privacy policy, please contact us.