# DPG Community Privacy Policy

We have updated or privacy policy to ensure you can easily see what we do with the personal information you give us and any information that could be used to identify an individual.

## What personal data do we hold?

- Names, email addresses and IP address
- Information on how you use DPG Community such as any comments you make or posts you share
- HubSpot (the service provider we use to manage email campaigns) report on how you interact with DPG Community emails. This reporting includes when you opened the email; which links within the email you clicked on; when and how many occasions you clicked on the links. HubSpot also records if the message 'bounced' or if you unsubscribed.

DPG Community member passwords are secure and private information that neither DPG Administrators or Ning (the organisation who run the platform on which Community sits) have access to.

## How did we collect the data?

We collected this data:

- when you requested to join the DPG Community
- when you use the DPG Community
- when you view and interact with our DPG Community update emails.

Our lawful basis for processing your data is your consent upon opting-in.

## Who do we share this information with?

1. Ning, who host the data. Their privacy policy is available at the following link: https://www.ning.com/privacy/

## What do we do with this information?

We use your name and email address to personalise and send updated messages, information and check security. We send email alerts to you about activity on DPG Community, such as when someone comments on one of your posts. You can personalise your alerts by selecting your profile, clicking 'options' then 'edit profile'. From there select the 'email' tab you'll be able to use tick boxes to specify which email alerts you want to receive. We record IP addresses to help in the event of a security issue and (via Google Analytics and HubSpot) to show us the popularity of posts, your location and how many people are using the system at any given time. The information we gather on DPG Community member activity is used to align the DPG Community and the regular updates with member needs.

## How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Declining cookies may prevent you from taking full advantage of the website.

## Links to other websites

Our community may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## How can information we hold about you be rectified?

You can log in to your DPG Community account and alter your name and email address at any time. This will automatically update Ning. Please contact us if you would like us to update the email address to which we send your regular updates.

## How do we accommodate your right to be forgotten?

You can delete your DPG Community account at any time by logging in to the DPG Community, selecting your profile and selecting the 'Leave DPG Community'. This would delete any information that could be used to identify an individual from the DPG Community on Ning or HubSpot. Contact us if you would like any posts or comments you have shared removed from the DPG Community. If we are unable to remove your information, we will tell you why.

## How do I restrict the processing of my information?

Collection of user information on how and when you use the DPG Community is a normal and essential process. There is no opt-out option. If you would not like us to gather information on how and when you use the DPG Community the only available option is to delete your DPG Community account.

## How do we accommodate the right of portability?

Upon request we will provide any data we hold on the DPG Community (and at Ning) that could be used to identify you and all content posted by you in a commonly used file format. The only information that could be

used to identify you held at HubSpot is your name and email address and possibly your contact number, if you gave us that information.

## How do we accommodate the right to object?

GDPR requires that you have the right to object to your data being processed in the performance of a legal task. DPG do not process your data in the performance of any legal task. GDPR requires that you have the right to object to your data being processed for direct marketing purposes. DPG do not process the data you submit to the DPG Community for direct marketing purposes. DPG Privacy Policy relating to promotional emails (and other matters) can be found by following this link: https://www.dpglearn.co.uk/dpg-policies/

GDPR requires that you have the right to object to your data being processed for research purposes. The only research DPG use your information for is to report on DPG Community and the regular update usage. If you wish to object to information being reported in this way, you would need to delete your DPG Community account. You can 'unsubscribe' from our weekly update at any time by using the 'unsubscribe' option at the footer of any update email.

## How do DPG deal with Subject access requests?

DPG will provide all the information that we hold about a person to that person only, within 30 days of the request in a commonly used format.

## What is DPG's data retention period?

We will retain your information for as long as your account is active or as long as needed to provide you with our services. We may also retain and use your information in order to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our agreements. If your account becomes inactive, we will retain your information up to a maximum of 7 years.

## What do DPG do in the unlikely event of a security breach?

In the unlikely event of a security breach or an unauthorised intrusion into material that can be used to identify you as an individual we will notify you as soon as possible and report the action we take in response. We may also notify the ICO. All new members are screened before membership is approved.

## Changes to our policy

DPG may need to amend this Privacy Policy at any time. The version date shown at the bottom of the page indicates the last time the policy was update. Any amendments are effective immediately, which we may give by any means, including, but not limited to, by posting a revised version of this Privacy Policy. Please review the policy periodically, as your continued use of DPG Community signifies your continuing consent to be bound by this Privacy Policy.

## Contact

For all requests relating to your personal data in the DPG Community, contact us via email:
courses@dpglearn.co.uk

Or write to us at:

DPG plc. GDPR Requests. 7 West Nile Street, Glasgow, G1 2PR, United Kingdom

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