

# GDPR Compliance Statement

## Comprobo General Data Protection Regulation (GDPR) Compliance Statement

Effective: 24<sup>th</sup> May 2018

### Contact Information

Comprobo Limited  
The Old Town Hall,  
4 Queens Road,  
London, SW19 8YB  
dpo@comprobo.co.uk

### Scope

This document concentrates on GDPR as applied to our users. If there are any Comprobo employees then their data also falls inside the scope of GDPR.

### The Types of Personal Data That We Collect

Comprobo collects personal data from data subjects who visit, and/or establish an account with, our client-sponsored web and mobile sites. We may collect the following types of personal data for the purposes listed:

<b>First/Last Name</b>	Your first and last name are used to personalize the user interface and any communications you may opt into receiving.
<b>Email Address</b>	Your email address is required to create an account, is your username, and is used by Comprobo to send electronic communications.
<b>Media</b>	Photographic, video and audio recordings may be taken and stored in order to detect and identify users. These may be kept for long periods, according to the Comprobo retention policy
<b>Employer</b>	The employer or other organization that enrolled you into Comprobo.
<b>IP Address</b>	We use your IP address to track network activity and confirm where you are taking an assignment or test.
<b>Workflow History</b>	The courses, tests and other online educational material (collectively called 'workflows') that you have taken.

<b>Workflow Attainment History</b>	The answers and consequent results of any tests or questionnaires that you have taken.
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## Use of Cookies, Privacy Policy

We use cookies to provide our website and enhance your experience as a user. By using Comprobo, you agree that we can store and access cookies on your device.

<b>What is a cookie?</b>	Cookies are small alpha-numerical files which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow us to recognise your device.
<b>How we use cookies</b>	We use cookies for a variety of purposes, such as collecting statistical information about usage of our website and enabling you to navigate between pages efficiently. <a href="#">See Cookie Table</a>
<b>How long do the cookies stay on your device?</b>	Some cookies, known as “session cookies”, will stay on your device only for as long as you are accessing our website. Others, known as “persistent cookies”, are stored on your device for longer periods. <a href="#">See Cookie Table</a>
<b>How to change your preferences so that cookies are not set on your device</b>	Most devices allow you to block cookies by adjusting the settings on your browser. However, if you use your browser settings to block all cookies (including essential cookies, such as those allowing you to log-in) you may not be able to access all or parts of our website. For further information about how to do so, please refer to your browser ‘help’ section or see <a href="http://www.allaboutcookies.org">www.allaboutcookies.org</a> .
<b>Changes to our Cookie Policy</b>	We will inform you of any changes to Comprobo’s Cookie Policy by posting them on this page. By continuing to use our website after any such changes have been made you are accepting the new Cookie Policy. Please ensure you check back regularly.

### Cookie Table

Type of Cookie	Purpose	Expires
<ul style="list-style-type: none"> <li>• Security</li> <li>• Strictly necessary</li> <li>• Analytical/performance</li> <li>• Functionality</li> <li>• Targeting</li> </ul>	<ul style="list-style-type: none"> <li>• Estimate audience size and usage pattern.</li> <li>• Store information about your preferences and allow us to customise our site and provide you with offers targeted at your individual interests.</li> <li>• Recognise you when you return to our site.</li> <li>• Allow you to use our site in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits.</li> </ul>	365 days or time period required by organisation.

<ul style="list-style-type: none"> <li>Analytic/Performance</li> </ul>	<ul style="list-style-type: none"> <li>Estimate our audience size and usage pattern.</li> </ul>	2 years
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In addition to this GDPR Compliance Statement, your use of the Comprobo portal is governed by and subject to the terms of our Privacy Policy, which can be accessed at any time on our website.

## Purposes for the Processing of Personal Data

Comprobo processes the personal data of EU data subjects for the purposes of:

- Completing registration
- Detecting and identifying users
- Delivering workflows to users
- Collecting the results of tests and questionnaires from users
- Personalizing user experience on our website
- Communicating with corporate business partners about business matters
- Conducting related tasks for legitimate business purposes
- Meeting legal or regulatory requirements and Comprobo's internal policies
- Other purposes disclosed at the time of collection

For all registered users who visit the Comprobo website, the basis for us to collect your personal information is your opt in at registration.

For all other data subjects, such processing has been determined to be in the legitimate interest of Comprobo and the respective data subject in order to promote an employment or business relationship, as applicable.

## Recipients of Personal Data

Comprobo may share personal data we collect from EU data subjects with third parties contracted to provide services on our behalf.

## Transfer of Personal Data to a Third Country

Personal data collected by Comprobo may be stored or processed in the United States or in any other country where Comprobo or its affiliates, subsidiaries, or third-party service providers maintain facilities. EU data subjects who provide personal data to Comprobo consent to the processing and transfer of that data to the United States and around the world.

Comprobo may also execute agreements with third parties for the transfer of personal data outside of the EU in a manner compliant with GDPR.

## Retention Period

Personal data is retained by Comprobo as long as necessary to execute its obligations under applicable contracts with business partners.

## **Access to, Modification and Deletion of Personal Information**

For questions about the collection of personal data by Comprobo or to exercise the right to access, correct, update, or delete such data or object, for legitimate purposes, to the processing of personal data, as provided under applicable law, please contact:

Comprobo Limited  
The Old Town Hall,  
4 Queens Road,  
London,  
SW19 8YB

[dpo@comprobo.co.uk](mailto:dpo@comprobo.co.uk)

Help us keep your data accurate. It is your responsibility to promptly update your profile and/or inform us of any personal information changes.

There may be cases where there are restrictions on the amount of information that can be disclosed to data subjects under applicable law. Comprobo is permitted to withhold some types of personal data in certain circumstances, subject to applicable local law requirements. If there is a dispute, please contact the Data Protection Officer at the above address. Data subjects have the right to lodge a complaint with a supervisory authority.

## **Right to Withdraw Consent**

Data subjects whose processing is based upon consent may withdraw that consent at any time by sending an email to [dpo@comprobo.co.uk](mailto:dpo@comprobo.co.uk)

Comprobo will remove first name, last name and email address, or describe the timeframe when this action will be taken, within the timeline required by GDPR.

Because this information is required for you to have a Comprobo account, your account will be removed and you will not be able to receive offers, services or marketing communications. Available cash back balances must be redeemed prior to removing your account or be forfeit.

## **Data Breach Notifications**

Data breaches will be handled in line with the GDPR regulations

## **Changes to This Statement**

We may update this Compliance Statement to reflect changes to our information practices. If we make any changes to this Compliance Statement, we will notify data subjects by means of a notice on this site as well as the applicable date. We encourage periodic review of this page for the latest information on our privacy practices.