

Privacy Policy

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Practical
Financial
Exams

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Introduction

Practical Financial Exams Limited takes the privacy of your information very seriously. During our legitimate business such as providing and marketing our products and services, we need to process some personal data. This Privacy Policy explains how we use any personal information we collect about you, or that you provide to us, when using our website, products, and services, should you choose to. It also explains your rights as a data subject, and our use of cookies.

This Policy applies between the User (“you”), and Practical Financial Exams Limited (“us” or “we”). This policy complies with EU and UK law including the General Data Protection Regulation (GDPR).

Practical Financial Exams Limited is registered with the Information Commissioner’s Office to process personal data under registration number A1100589. Practical Financial Exams Limited is the “data controller” which means that we determine how your data is processed.

This Policy does not extend to any external websites that can be accessed from the Practical Financial Exams Limited website such as social media websites, or the websites of any other company.

This privacy policy should be read alongside, and in addition to, our Policies, Procedures, and Processes document, and our Terms of Service, which can be found here:

| | |
|-------------------------------------|---|
| Policies, Processes, and Procedures | https://practicalfinancialexams.co.uk/scqf-credit-rating |
| Terms of Service | https://practicalfinancialexams.co.uk/terms |

In this Privacy Policy, it should be understood that:

- The singular includes the plural and vice-versa.
- Reference to a person also includes firms, companies, government entities, trusts, and partnerships.
- Any examples are purely for illustrative purposes to add context to the policy and are non-exhaustive, with “including” and “such as” meaning “including but not limited to”.
- Reference to any laws or legal statute includes any modification of or amendment to it.

How and Why We Collect Your Data

We may collect information from you in two ways:

- 1) We collect the information automatically.
- 2) You provide the information to us.

Information You Provide to Us

You may provide us with information where:

- You purchase goods and/or services via our website/online store.
- You send us an Enrolment Form.
- You join our mailing list.
- You send us a message via the Contact Us page and/or Messenger service on our website.
- You create, log in, or otherwise manage your account on our website.
- When you provide us with information in any communications between us, including via our website, by telephone, post, e-mail, social media, messaging apps, or any other means.
- When you voluntarily complete customer surveys.
- When you voluntarily provide us with customer feedback.
- When you voluntarily participate in our polls or competitions, e.g., on social media.
- When you make payments to us outside the website, such as via bank transfer.
- When you voluntarily elect to receive marketing communications from us.
- When you provide us with assessment evidence, which we can then use to establish your mark, grade, and any relevant feedback.
- When you engage with us for any other purposes, such as about appeals or complaints.

We use Stripe as our payment processor, and we also allow payment via PayPal. Practical Financial Exams Limited does not store your payment details; these are input and held with Stripe and PayPal. You can access their respective privacy policies here:

| | |
|--------|---|
| Stripe | https://stripe.com/gb/privacy |
| PayPal | https://www.paypalobjects.com/webstatic/ua/pdf/EU/privacy.pdf |

We may need to gather information related to access arrangements, reasonable adjustments, and special considerations, which may include details of protected characteristics under the Equalities Act 2010 such as disability, gender/sexuality, and religion. This is to allow us to enable fair access to assessment for everyone, regardless of their protected characteristics. Examples may include:

- Religious candidates who need time to pray during an assessment.
- Visually impaired candidates who may require a large-print assessment paper.

If any of your information changes, please keep us up to date by e-mailing any new information to contact@practicalfinancialexams.co.uk.

Enrolment Forms

When enrolling for a qualification, you provide us with the following information via an Enrolment Form, for the following purposes:

| Data | Purpose |
|--|---|
| Full name, address, postcode, date of birth, phone number, e-mail address. | This information enables us to understand and confirm candidates' identities; and get in touch with candidates where required. We also use this information to manage conflicts of interest. For example, to ensure that no candidate is also an Assessor for the same paper. |
| Job title (optional field). | This information is for data analysis purposes, so that we can better understand what our customers do day-to-day and continue to meet their needs in future through the development of new and existing products. For example, if 80% of our customers indicated they worked as paraplanners, this would inform our product design going forward; new products would be developed with paraplanners in mind. |
| Employer name, address, postcode, and telephone number, and that you consent to Practical Financial Exams disclosing your exam result to your employer, including mark and grade (optional field). | This information is required so that, where permitted by you, we can upon your employer's request provide your them with your exam record, including any details of attempts and results. For example, this might be the case where your employer has paid for your qualification. Furthermore, to enable us to better understand our customers by analysing which companies they're working for, allowing us to continue to meet their needs in future through the development of new and existing products. |
| That you have read and agree to have your personal data stored and processed according to this Privacy Policy. | So that we can be confident you have read and understood how we intend to use the data you provide us on the Candidate Enrolment Form. |
| That you have read and agree to the Practical Financial Exams Limited Quality Assurance Policies, Processes, and Procedures document, and our Terms of Service, including our Accessibility | So that we can be confident that you are aware of our terms and conditions, including the fact that you need to proactively contact us if you believe you could be eligible for a reasonable adjustment or special consideration. |

| | |
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| Arrangements and Reasonable Adjustments Policy. | |
| That Practical Financial Exams Limited may publish your successful assessment results on our social media accounts (optional field). | This is for marketing purposes. |
| Signature and date of signature. | To affirm that your answers on the Candidate Enrolment Form are true and complete to the best of your knowledge, and that you understand that false or misleading information on the form may result in immediate disqualification, and that no refund will be given. |

Data We Collect Automatically & Cookie Policy

This section explains how we collect information automatically.

We may automatically collect your IP address, geographical location, pages visited, and the dates, times, and frequency with which you use the website, which helps us make ongoing improvements to the website to deliver a better experience for our customers and prospective customers.

This data is collected via Cookies. A cookie is a small file of letters and numbers that is downloaded onto your computer when you visit a website, such as the Practical Financial Exams Limited website. Cookies are used by many websites, and we may use Cookies for various things, such as remembering your preferences, helping you log into your account, recording what you have put in your shopping basket, counting the number of people looking at the website, and to show you Practical Financial Exams Limited adverts and other content on other websites.

We may use analytics Cookies to learn more about how our Users are using the website, and to track the performance of the website.

Cookies can be enabled or disabled in your internet browser, and you can choose to delete them at any time, although you may lose information that enables you to access the website and our products and/or services more quickly and efficiently.

For more information about Cookies, please visit the Cookies page on the Information Commissioner’s Website: <https://ico.org.uk/your-data-matters/online/cookies/>.

If you subscribe to our mailing list, create an account, become a member, and/or become a customer, we can tell when and how you open and engage with our marketing campaign e-mails. This information is held on our GoDaddy account. This enables us to understand how effective our e-mail marketing campaigns are at engaging our customers and prospective customers, so we can develop our e-mail marketing campaigns accordingly.

How long do we store your information?

This section should be read in conjunction with our Data Retention Policy, which is part of our Policies, Processes, and Procedures document available here:

| | |
|-------------------------------------|---|
| Policies, Processes, and Procedures | https://practicalfinancialexams.co.uk/scqf-credit-rating |
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Our Data Retention Policy is a requirement of the Scottish Qualifications Authority (SQA) and explains how long we store information related to assessments. As such, we will not repeat it here in full, but can summarise the policy as follows:

| Type of Record | Retention Period |
|--|---|
| Learner Information Form / Learner personal information | Twenty-five (25) years |
| Learner personal information that is special category data / sensitive personal data | One (1) year or whenever the external verification process has taken place (whichever is longest) |
| Records of Learner assessment | Twenty-five (25) years |
| If subject to internal assessment appeal | Until the appeal is resolved |
| Malpractice investigations and decisions | Three (3) years |
| Appeals against malpractice decisions | Three (3) years |
| If subject to investigation involving a criminal prosecution or civil claim | Six (6) years |

Personal information related to our Private Training Days and Webinars is stored for three (3) years from the date of the Private Training Day and/or Webinar.

We will delete your data on request. However, even if we delete it, we may still hold it on a back-up hard drive for legal, tax, and/or regulatory purposes.

GoDaddy provides our website and online store. If you subscribe to our mailing list, create an account, and/or become a customer, you provide us with information such as your name, e-mail address, telephone number, and latest activity (e.g., e-mail viewed, completed new order, etc). We can also tell when and how you open and engage with our e-mails. It is held on our GoDaddy account and as far as we know it is stored indefinitely. You can access the GoDaddy Privacy Policy here:

| | |
|------------------------|---|
| GoDaddy Privacy Policy | https://uk.godaddy.com/legal/agreements/privacy-policy |
|------------------------|---|

You can unsubscribe from our mailing list at any time by clicking “unsubscribe” on one of our e-mails, and/or request your information deleted or amended from our GoDaddy account anytime by e-mailing contact@practicalfinancialexams.co.uk.

We often communicate with our clients via social media such as LinkedIn and WhatsApp. For example, via private messaging and comments on posts. Information stored on these websites is according to their own Privacy Policies. As far as we know, this information is stored indefinitely.

| | |
|------------------|---|
| LinkedIn | https://www.linkedin.com/legal/privacy-policy |
| Google (YouTube) | https://policies.google.com/privacy?hl=en |
| Facebook | https://www.facebook.com/about/privacy |
| Instagram | https://help.instagram.com/155833707900388/%22 |
| WhatsApp | https://www.whatsapp.com/legal/updates/privacy-policy/?lang=en |
| Twitter | https://twitter.com/en/privacy |

Sharing Your Information

The following information about assessment candidates is provided to our contractor Assessors:

| Data | Why Is It Shared? |
|--|--|
| Full name, Unique Candidate Number, postal address, postcode, telephone number, and date of birth. | To enable our contractor Assessors to confirm candidates' identification, and for the Assessor to contact the candidate to arrange assessment. |
| Date of enrolment and enrolment expiry. | To enable our contractor Assessors to confirm that the assessment is taking place within the candidates' enrolment period. |

For practical reasons, information relating to access arrangements, reasonable adjustments, and special considerations may be shared with our contractor Assessors. This is communicated on an ad-hoc basis, depending on the specific requirements of the candidate.

We may provide personal information on an ad-hoc basis to contractors when we outsource a particular service, such as the delivery of a Webinar or Private Training Day.

We may also share personal information with the following groups of people for the following reasons:

- Our professional advisers, such as accountants, solicitors, and financial advisers for us to obtain professional advice.
- Third party payment providers who process payments made over the Website to enable third party payment providers to process user payments and refunds, and to enable evidence to be provided to them in the event of a dispute.
- For legal and/or regulatory requirements, security reasons, and safety purposes, such as to comply with such a request made by a relevant authority in the UK, and to respond to lawful requests and legal processes.
- For the purposes of, or negotiation of, a business deal with regards to the sale or transfer of some or all our business assets and/or control, including mergers, financing, acquisitions and/or bankruptcy transactions or proceedings. In these cases, the new owner and/or controllers would be able to use your information for the purposes for which it was originally supplied to us.
- The Scottish Qualifications Authority, for external verification purposes, and as the credit rating body for our qualifications.
- Ofqual, as the English regulator for qualifications, should we decide to seek regulation from them in future.

Any information that cannot be used to identify you can be shared or published by us. This helps us market the business, provide prospective candidates with information like pass/fail rates, and evaluate our customer base.

We use the following third-party providers to enable us to operate our business and provide our products and services to you. Some of these have servers located in the United States of America. As a

result, there will be a transfer of your data outside of the European Economic Area (EEA) to the United States of America and locations around the world. By using the Practical Financial Exams Limited products and/or services, you consent to our transferring your information to countries outside the EEA where and as necessary. Below are the third-party providers, with their purpose for Practical Financial Exams Limited and links to their privacy policies.

| Provider | Purpose | Link to Privacy Policy |
|--------------------|--|---|
| Dropbox | Facilitating the sharing of necessary files between Practical Financial Exams Limited employees, company officers, and contractors | https://www.dropbox.com/privacy |
| GoDaddy | Building and maintaining the website and domain | https://uk.godaddy.com/legal/agreements/privacy-policy |
| Stripe | Payment processor | https://stripe.com/gb/privacy |
| PayPal | Payment processor | https://www.paypalobjects.com/webstatic/ua/pdf/EU/privacy.pdf |
| Microsoft Exchange | E-mail server | https://docs.microsoft.com/en-us/exchange/about-documentation/privacy-statement?view=exchserver-2019 |
| WeTransfer | Sending assessment evidence between PFE and its contractor Assessors. NOTE: WeTransfer is based in Amsterdam, the Netherlands. | https://wetransfer.com/legal/privacy |

Data Security

We take reasonable steps both in terms of policy within the organisation and, also using technology, to keep your data secure. However, while we take these reasonable steps, we cannot guarantee the security of your data.

All personal information, such as from Enrolment Forms and Assessment decisions, is stored in a Dropbox account which enables secure sharing between Practical Financial Exams Limited company officers, employees, and contractors. Only company officers (Directors and the Company Secretary) are allowed to be administrators, and Practical Financial Exams Limited attempts to share the minimum amount of personal data possible with employees and/or contractors, whilst enabling us to carry out our legitimate business.

Data is backed up monthly onto an external hard drive, which is locked in a cabinet in the Managing Director's office.

Payment details are encrypted using SSL technology. Our SSL Certificate is issued by Go Daddy Secure Certificate Authority – G2.

Where using WeTransfer, the transfer is password protected. Assessment evidence is permanently deleted from the hard drives of our contractor Assessors once the relevant assessment evidence has been graded and returned to PFE.

If you suspect data misuse or unauthorised access, please contact us immediately at contact@practicalfinancialexams.co.uk.

Visit Get Safe Online at www.getsafeonline.org for information on how to protect yourself against a wide range of online problems such as fraud, identity theft, and viruses.

Your Rights

You have the following rights in relation to your Data:

| Right | Explanation |
|--|---|
| Right to access | The right to request copies of the information we hold about you at any time, or that we modify, update, or delete such information. If we provide you with access to the information that we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted, we may refuse your request. If we refuse your request, we will tell you the reasons why. |
| Right to correct | The right to have your Data rectified if it is inaccurate or incomplete. |
| Right to erase | The right to request that we delete or remove your Data from our systems. |
| Right to restrict our use of your Data | The right to "block" us from using your Data or limit the way in which we can use it. |
| Right to data portability | The right to request that we move, copy, or transfer your Data. |
| Right to object | The right to object to our use of your Data including where we use it for our legitimate interests. |

To enquire about or exercise any of the above rights, or withdraw consent for us processing your data, please contact us at contact@practicalfinancialexams.co.uk.

Complaints

If you wish to make a complaint regarding to the processing of your data, please contact us at contact@practicalfinancialexams.co.uk. If for whatever reason we were unable to resolve the complaint, or you were unhappy with the way we handled your complaint, you may be able to refer your complaint to the Information Commissioner's Office (ICO). You can contact the ICO here: <https://ico.org.uk/>.

Amendments to Privacy Policy

We may amend this privacy policy from time to time or as may be required by law. By using the website, you accept the terms of the privacy policy on the first use of the website following any alterations. The current version of the privacy policy was updated in September 2021. If you have any enquiries regarding this, please contact us at contact@practicalfinancialexams.co.uk.

Contact Details

You can contact us at contact@practicalfinancialexams.co.uk.