

Website Privacy Notice

Last Updated: 12th August 2024

Introduction

ABA Autism Education Limited ("ABAEL", "we, "us", "our"), of 148 Mitcham Road, London, England, SW17 9NH, a company registered in England and Wales, registration number 08233627, is committed to protecting the privacy and security of the Personal Data we collect about website visitors and end customers ("you", "your").

The purpose of this privacy notice is to explain what Personal Data we collect about you when you visit our website. When we do this, we are the Controller of the Personal Data we process, registered in the UK with the Information Commissioner's Office ("ICO"), registration number ZA481891.

Please read this privacy notice carefully as it provides important information about how we handle your Personal Data and your rights. If you have any questions about any aspect of this privacy notice, you can contact us using the information provided below in the 'Contact us' section.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

Personal Data we collect

When you visit our website, we may collect the following categories of Personal Data:

- First and Last name;
- Business email address:
- Personal email address (if provided); and
- Any Personal Data you choose to provide in our free-text box.

Information about our use of Cookies

We use essential cookies only on our website. Cookies are small text files which are downloaded to your device when you visit a website, unless you have set your browser to reject them.

To learn more about cookies, please visit https://www.allaboutcookies.org/.

Purposes for which we use Personal Data and the legal bases

We may use your Personal Data for the following purposes and on the following lawful bases:

| Purpose | Lawful Basis for Processing |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Responding to correspondence from you | It is in our legitimate interest to respond to enquiries made via our website, through our social channels or any other means |

Sharing your data

It is unlikely we will ever share the Personal Data of website visitors outside the UK. However, if a business need arises and it becomes necessary for us to share your data outside the UK, we will only share it with organisations in countries which benefit from a UK Adequacy Regulation or similar arrangement, or if not, by using the UK International Data Transfer Agreement, which contractually obliges the recipient to process and protect your Personal Data to the standard expected within the UK.

How long we keep your data

We will retain your Personal Data for as long as is necessary to satisfy the purpose of collection and for a reasonable period thereafter.

At the end of the retention period, your Personal Data will be securely deleted. Retention periods are detailed within our Personal Data Retention Policy. This information is available upon request.

How we protect your data

We implement appropriate technical and organisational measures to protect data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Your data protection rights

There are certain fundamental rights that you have in respect of your Personal Data:

| Rights | Description |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Right to be informed | Individuals have the right to be informed about the collection and use of their Personal Data |
| Right of access | Individuals have the right to receive a copy of their Personal Data, and other supplementary information |
| Right to rectification | Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete |
| Right to erasure | Individuals have the right to request their personal information to be erased, in certain circumstances |
| Right to restrict processing | Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: • if your data is not accurate; |

| Rights | Description |
|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | if your data has been used unlawfully but you do not want us to delete it; if your data is no longer needed, but you want us to keep it for use in legal claims; or if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request |
| Right to data portability | Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances |
| Right to object | Individuals have the right to object to the processing of their Personal Data, in certain circumstances Where we are using your Personal Data because it is in our |
| | legitimate interests to do so, you can object to us using it this way Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so |
| Rights with respect to automated decision-making and profiling | Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you |

In addition to the above, an individual also has the following rights:

| Rights | Description |
|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| Right to withdraw consent | Where we are using your Personal Data based on your consent, you can withdraw your consent at any time |
| Right to lodge a complaint with a supervisory authority | You have the right to raise a complaint about how we handle your personal information with a relevant supervisory authority. |

Exercising your data protection rights

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances

Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us at privacy@abael.co.uk.



Raising a complaint with the UK data protection supervisory authority

If you believe you have exhausted all possible avenues for resolving your data protection concerns with us, you may lodge a complaint with the ICO by calling their Helpline on 0303 123 1113.

You can also send your postal correspondence to:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Alternatively, you can contact them at https://ico.org.uk/make-a-complaint/.

Data Protection Officer

We do not have a statutory requirement to appoint a Data Protection Officer ("DPO") under the UK GDPR. However, for the purposes of compliance and accountability, we have appointed <u>Evalian Limited</u>, a company specialising in data protection, cyber security and information security, as our DPO. Evalian Limited can be reached at <u>dpo@evalian.co.uk</u>.