

# Purpose and Scope

Under this statement 'Company' refers to the Parent Company, Lifelong Learner Holdings ("LLH") and the Talogy and PSI Testing Excellence subsidiaries.

The purpose of this statement is to outline how the company collects Personal Data to further advance and improve the products and services we offer.

The company is classed as the Data Controller under the General Data Protection Regulations (GDPR) and the UK Data Protection Act 2018. The company takes its obligation to protect your privacy and personal information very seriously.

This Privacy Statement (the "Statement") is aimed at informing individuals who participate in the research assessments as to how the company collects, uses, shares and otherwise processes information from individuals ("Data Subjects") as part of a research project, including any personal information or other information from which we can identify you ("Personal Data") when you visit our assessment platforms.

This Statement applies in all regions across the globe in which the company operates and covers the Personal Data of individual Data Subjects who complete our assessments through our platforms for the purpose of research and development.

By completing the assessments for research purposes, you agree that your Personal Data will be handled as described in this Statement. If you do not agree to the terms in this Statement, you must not complete the research assessment. Your use of our assessment platform, and any dispute over privacy, is subject to this Statement and our terms of service, including its applicable limitations on damages and the resolution of disputes or any service-specific terms made available to you when you sign up to complete the assessment for research purposes. If you have any questions or complaints in relation to this Statement, you may contact our Data Protection Officer [here](#).

## Information We Collect

When Data Subjects complete the assessments for the purposes of furthering research and development for the company, we may ask for Personal Data of the Data Subject, this personal information will only be used for the purpose of research.

We will:

- Only ask for relevant information.
- Ensure that it can only be accessible to those within PSI who need to see it.
- Retain it for only for as long as it is required for research, statutory or legal requirements.

Based on the project description, the personal data that we collect may include (but not be limited to):

- First name
- Last name
- Gender
- Age group
- Email address
- Ethnicity (optional)
- Professional information such as industry, role, certifications or qualifications

# Data Storage and International Transfers

Data for the purposes of research and development is stored within the UK and the European Union.

We may share your Personal Data within the company for the purposes stated above. This may involve transferring your information outside the European Economic Area (“EEA”). Whenever we transfer your Personal Data outside of the EEA, we ensure a similar degree of protection is afforded to it by implementing the following safeguards:

- **Standard Contractual Clauses.** All processors are required to enter Standard Contractual Clauses as detailed in Article 46, GDPR, which contain appropriate transfer safeguards and are approved by the EU.
- **Intra-Group Transfer Agreement.** In addition to the Privacy Shield frameworks, all relevant subsidiaries across the globe have entered into an intra-group transfer agreement committing to compliance with the General Data Protection Regulation 2016/679 (“GDPR”) as set out in the European Commission’s standard contractual clauses for data transfers.
- **Other International Transfers.** Personal Data may be processed outside your jurisdiction by our subprocessors. Please refer to our list of [PSI Testing Excellence Subprocessors](#), [Talogy Subprocessors](#) and the locations where Personal Data may be processed by the subprocessors. We ensure that our subprocessors offer an adequate level of protection to the Personal Data by entering into appropriate agreements committing them to compliance with GDPR and other applicable laws.

## Purpose of Processing

The purpose of the processing is for internal research and development to help us improve our existing and build new products and services.

In addition, we may use your personal data to contact you but only if you have opted-in, for marketing purposes.

## Data Subject Rights

Under GDPR we are Data Controllers of a Data Subject’s Personal Data with respect to research and development information. Under data protection law, you can exercise your rights according to the lawful basis used for processing. All individuals have the right to:

- Request access to your Personal Data.
- Request correction of your Personal Data.
- Request erasure of your Personal Data.
- Object to processing of your Personal Data.
- Request restriction of processing of your Personal Data.
- Request transfer of your Personal Data.
- Right to withdraw consent To exercise any of these rights, please submit a request to us by emailing our Data Protection Officer through our [Privacy Portal](#).

## Personal Data Opt-Out and Opt-In

We may engage in marketing campaigns to introduce new products or services that may be of interest to our current or prospective Clients.

Where required by applicable law, we will only engage in such marketing communications if the individual has opted into these communications.

Individuals may opt-out of the processing of their Personal Data by exercising their right to withdraw consent and the right to object to the processing of their information.

To opt-out of commercial emails, simply click the link labelled “unsubscribe” at the bottom of any email sent by us.

Please note that even if you opt-out of commercial emails, we may still need to contact you with important transactional information about your account. For example, we will still send assessment confirmations and information about assessment results even if commercial emails have been opted-out (or not opted-in).

Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes.

## Third-Party Disclosures

We do not share your Personal Data with third parties for their own marketing purposes.

We may disclose your Personal Data internally, within subsidiaries of the Company, and other third parties as set forth below.

When we disclose Personal Data, the recipient is required to keep that Personal Data confidential, secure and process the Personal Data only for the specific purpose for which they are engaged:

- Processors/Service Providers: We may share information with our subprocessors, including Company subsidiaries and other third-party providers who provide services to us. Please see above for a list of all Company subprocessors.
- Law Enforcement/Public Authorities: We may be required to disclose information to public authorities, regulators, or governmental bodies, as required by the applicable law or regulation, under a code of practise or conduct, where necessary to facilitate any investigation, or where we believe that disclosure is appropriate to protect our rights and interests or the rights and interests of third parties.

## Updates to the Privacy Statement

We reserve the right to amend or change this Statement from time to time. By continuing to use our assessment platforms after we post any such changes or updates, you accept the Statement as modified.

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