# **Privacy policy**

**Date: 1 June 2023** 

Welcome to Teach Me TB!

We respect your right to privacy.

This Privacy Policy applies to your use of www.teachmetb.org (the "Website"). It tells you (the Customer) what to expect when we collect personally identifiable information about you, and what your rights are concerning the collection of your information. It is provided in accordance with our obligations under the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

We will not collect any personally identifiable information about you unless it is in response to you using our Website or actively registering for one of our online products. The security of your personally identifiable information is extremely important to us.

This Privacy Policy is regularly reviewed to make sure that we continue to serve your privacy interests and we reserve the right to update it as we deem necessary.

Please review this Privacy Policy carefully. It should be read alongside the Teach Me TB Terms and Conditions. Unless otherwise defined, terms used have the same meaning as in the Terms and Conditions.

If you have any questions, comments, or complaints about this Privacy Policy please contact us at the details set out below.

#### 1. About Us

In this Privacy Policy, references to "we" or "us" are to TBpeople Global, incorporated in England and Wales (registration number 11532522) whose registered address is at Suite 46 Hindon Court, 104 Wilton Road, London SW1V 1DU, United Kingdom.

#### 2. What information we collect

### 2.1. Registering with Teach Me TB.

When you register on the Website, when you create and update your Learner profile, and when you purchase Online Courses on the Website, we and third parties working with us will collect the following information:

- Name, email address (required)
- Home city and country

## 2.2. Learning journey

When you are participating on an Online Course, we and third parties may collect and store the following additional information:

- comments you voluntarily post while participating in online discussions with the Course educators and other Learners during the Course run
- any email communications with Teach Me TB to seek user support or to send queries related to the Course
- any content submitted by you during the Course, such as written assignments, quizzes, and examinations, and the results of any assessments
- any data and documentation you submit in order to verify your identity where required to obtain a certificate or academic accreditation (collected by our third-party identity verification vendors who may store your information for the sole purpose of identification verification)
- responses you voluntarily provide to Teach Me TB, the Course educators, or third parties in questionnaires, surveys, or user research that you participate in related to the Course

# 2.3. Requesting additional information on a Teach Me TB Course

We collect information from visitors to our Website who express interest in a particular Online Course and wish to be contacted by the university or other institution offering the Course. The information includes:  Name, email address, educational background, employment background, address, country of residence and telephone number

## 2.4. Accessing the Website

When you access the Website we may use cookies to track, collect, and aggregate information about your use of the Website, including pages you have visited, the specific URLs that brought you to our Website, and links embedded on our Website that you have accessed. This information may include IP addresses, and any information collected by cookies. This may also include information such as the time and length of visits to certain pages on our website and page interaction information.

## 3. How we use your information

- 3.1. In providing our online services and products to you, we and third parties we work with will collect, store, and use your personal information for the following purposes:
- 3.1.1. to manage your Learner account;
- 3.1.2. to provide technical support to you;
- 3.2.3. to send you email notifications and updates about Courses you are enrolled on;
- 3.1.4. where you are invited by a Course provider or a third party institution such as your employer to enrol on a Course, to allow the that entity to enrol you on the Course, and to monitor and track your progress on the Course;
- 3.1.5. if you are taking a Course for academic credit, professional certification and/or other formal recognition of learning, to allow the university or other institution to monitor and track your progress, to award you with the relevant recognition as applicable, and to make direct contact with you regarding your progress and completion of the Course:

- 3.1.6. to contact you occasionally in order to invite you to share your opinions of and experiences with Teach Me TB, and to to publish customer reviews and ratings of our Courses on our Website or on other media channels;
- 3.1.7. for marketing purposes, where you provide us with your consent to receive marketing communications, which may include email and/or telephone communications with information, news, and offers of Courses on our Website and third party offers;
- 3.1.8. for creating prospective customer databases by matching demographic data from your depersonalised information with members of the general public;
- 3.1.9. to use your information in an aggregated format to identify trends on our website and trends in our customer database. We may use this information in an aggregated and anonymous format and may share this information with third parties;
- 3.1.10. in connection with campaigns with higher education institution partners, to provide universities you have expressed an interest in, with your personal information so they may assess common areas of interest between their students and Teach Me TB Learners and improve their educational programme offerings. Any such data gathering will also be pursuant to the universities' own privacy policies;
- 3.1.11. to share general user data with our Online Course providers for research related to online education (as more fully set out below);
- 3.1.12. to enable you to participate in our refer-a-friend rewards scheme.
- 3.1.13. to enable other learners on our platforms to view the information you have chosen to add to your profile and, depending on the profile settings you have selected, your course activity;
- 3.1.14. if you have decided to make your profile settings public, to enable members of the public to see your profile and course activity by

searching for relevant Teach Me TB courses and topics on the internet; and

- 3.1.15. to personalise our services (the Teach Me TB Website, any email communications) so as to best meet your needs, for example by providing tailored Course recommendations.
- 3.2. We use cookies to collect information relating to your use of the Website to enable, maintain and improve the functioning of our Website and the quality of our products and services. For more information, please see our Cookies Policy.

## 4. Whom we may share your information with

- 4.1. For the above purposes, we may share your information with the following third parties. Please note that any third parties' use of your personal data will be governed by their own privacy policies and give rise to separate obligations under applicable data protection laws. We suggest that you carefully review any third party privacy policies that may apply to you.
- 4.2. Third parties that may receive your information include:
- 4.2.1. universities and other institutions that provide Online Courses on our Website, and institutions that award academic credit to Learners who successfully complete an Online Course;
- 4.2.2. providers of assessments and marking services when you register for an assessment or submit a piece of work for marking in connection with an Online Course;
- 4.2.3. customer relationship management service providers (which allows us, for example, to send personalised email communications to you);
- 4.2.4. our file storage and management service providers;

- 4.2.5. our third party review and ratings partner, who assists us with collecting and moderating any review and rating you may elect to provide of our Online Content and Courses;
- 4.2.6. if we sell, buy, give or receive any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets, provided that they continue to use your information in accordance with the terms of this Privacy Policy;
- 4.2.7. if all, or substantially all of our assets, are acquired by a third party provided that they continue to use your information in accordance with the terms of this Privacy Policy, in which case information held by us will be one of the transferred assets; and
- 4.2.8. Any entity to which we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other legal requirements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

# 5. How our Course providers may use your information

- 5.1. Some universities and other institutions that provide Online Courses on our Website are required to conduct research on their online educational programmes in order to qualify for research funds. Accordingly, your activities on an Online Course including comments you contribute while on a Course are shared with our Course providers to enable them to fulfil their research requirements.
- 5.2. In addition, after you have registered with Teach Me TB and together with our academic partners we may use your data to determine the level of interest in enrolling in further courses offered by the academic partner.
- 5.3. Our Course providers may also embed links within the Online Course material or within emails related to the Course, and such links if selected will take you off the Teach Me TB Website and bring you to a third party website, for which the Course provider is solely responsible. If you are asked to submit personal information on any third party

websites, the collection of that information will not be covered by this Privacy Policy and you must familiarise yourself with the terms and conditions and privacy policy of the third party website before submitting your information. At no time will you be required to submit any information on third party websites as a condition for continuing the Online Course on the Teach Me TB Website, and your decision not to provide information on third party websites will never affect your progress or any marks on the Course.

# 6. Legal Basis for Processing Your Information

We have several legal bases for collecting and using the personal information described above. They are:

- 6.1. Where the use of your personal information is necessary to perform our obligations under any contract with you (including providing you with access to Online Courses on the Website for which you have registered and/or made a purchase);
- 6.2. Where we have your explicit consent to collect, store, and use your information for a particular purpose, including where you consent to receiving marketing and promotional communications for products on our Website or third party websites;
- 6.3. Where use of your personal information is necessary for purposes of pursuing our legitimate interests or the legitimate interests of a third party such as our Course providers, as long as these interests are not outweighed by your own interests, fundamental rights, or freedoms. For example, we will need to ensure that in these cases you would reasonably expect your personal information to be used, and that it would have a minimal impact on your personal privacy. Such legitimate interests are:
- 6.3.1. to conduct our day-to-day business, including the operation of a fully functioning website offering online educational products;
- 6.3.2. to build relationships with universities and other institutions in the online education sector;

- 6.3.3. to ensure we are delivering a high level of customer service through ongoing customer communications and responses to customer queries;
- 6.3.4. to invest, test and roll out new products which we believe will benefit our customers or prospective customers;
- 6.3.5. track and ensure completion of contractual obligations;
- 6.3.6. carry out market research and business development;
- 6.3.7. to operate our website;
- 6.3.8. to consider your employment application, if you apply for a role at our company; and
- 6.3.9. In some cases, we may have a legal obligation to collect personal information from you.

## 7. Storage and Security of Information

- 7.1. All information is stored on our secure servers. When you register, we will ask you to choose a password which enables you to access the Online Courses and Content. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.
- 7.2. In addition, we (or third parties acting on our behalf) may also store or process information that we collect about you in countries outside the United Kingdom or outside the European Economic Area, which may have different standards of data protection than in the UK. Specifically, servers used by our Website are located in the Republic of Ireland and we work with Course providers and third party service providers around the world. We have put in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information. However, whilst we have used our best efforts to ensure the security of your data, it is your responsibility to make an informed decision to avail yourself of our services and products

or if your concerns about the handling of data require you to refrain from using our Website.

#### 8. Data Retention

- 8.1. We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- 8.2. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 9. Your Rights

- 9.1. You have the following data protection rights:
- 9.1.1. You can edit your personal details via your profile page whenever you wish. We maintain a procedure in order to help you confirm that your personal information remains correct and up-to-date or choose whether or not you wish to receive material from us or some of our partners.
- 9.1.2. You have the right to object to your personal data being used for direct marketing purposes including to personalise the course recommendations you see on our platform. You can exercise this right by contacting us using the contact details provided under the "Contact details" heading below.
- 9.1.3. In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "Contact details" heading below.

- 9.1.4. You may unsubscribe from certain email communications by following the Unsubscribe link in the email communication itself. You may also update your personal information by logging into the Website and visiting your Learner account page. You may also email us at info@tbpeople.org.uk in order to access, correct, or update your personal information on our systems. We will answer every email as promptly as possible. Unless you are also enrolled with a University and are taking an Online Course for Accreditation, or you are taking an Online Course through your employer, you have the right to delete your account. To do so, you can go to your settings.
- 9.1.5. Similarly, if we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- 9.1.6. If you have any privacy-related questions or unresolved problems, you may contact us using the information provided below.
- 9.1.7. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the United Kingdom, the European Economic Area, Switzerland and certain non-European countries including the US and Canada are available here.)

#### 10. Children

We take seriously our legal obligation to protect the privacy of children. Accordingly, we do not knowingly collect or maintain personal information from persons under 16 years of age, and no part of the Website is directed to persons under 16 years of age. If you are under 16 years of age, then please do not use or access the Website at any time or in any manner. We will take appropriate steps to delete any personal information of persons less than 16 years of age.

#### 11. Cookies

The Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website or Online Courses may no longer be available to you.

#### 12. Contact details

TBpeople Global Suite 46 Hindon Court, 104 Wilton Road, London SW1V 1DU, United Kingdom

E-mail: info@tbpeople.org.uk

# 13. Updating this Privacy Policy

We may update or amend this Privacy Policy from time to time, to comply with law, in accordance with best practice in our industry, or to meet our changing business requirements. Any updates or amendments will be posted on the Website. By continuing to access the Website, use the Online Courses and Content, and/or provide content in connection with the Online Courses and Content, you will be deemed to have accepted the Privacy Policy as amended at the time of your access and use.

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