

1st Option Privacy Statement

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1. Privacy and Cookies Policy

Last updated: April 2018.

This is the 1st Option Safety Group privacy and cookies policy for 1st Option websites. Where you have signed a specific set of terms and conditions, they shall override any inconsistent terms stated below. We will provide notice where you may be redirected to a third party website and encourage you to carefully read their privacy policies.

Changes to this policy will continue to be posted here. Please check the website regularly for any changes to this Policy.

BY USING THIS WEBSITE, YOU AGREE TO THE TERMS OF THIS PRIVACY AND COOKIES POLICY.

2. Scope of this Policy

This privacy policy describes how 1st Option Safety Group will use the personal information collected when you visit 1st Option Safety Group websites and mobile applications that contain a link to this privacy policy (each, a "Service"). A Service may supplement this privacy policy with additional privacy terms or with additional privacy notices in connection with certain features of that Service.

This privacy policy does not apply to websites, applications or mobile platforms that are not linked to this privacy policy or to those operated by third parties. We encourage you to review the privacy policies posted on those websites, applications and mobile platforms.

3. Collection of Information

3.1 Information provided by you

The types of information the Service collects directly from you may include the following as well as any other information type that we expressly ask you to enter and submit to the Service:

- Contact information, such as your name, email address, mailing address and telephone number;
- Usernames and passwords;
- Payment information, such as a credit or debit card number;
- Educational and employment background;
- Comments and feedback;
- Interests and communication preferences.

3.2 Information collected automatically

The Service automatically collects certain information regarding your use of the Service. Examples of information collected automatically include:

- Internet Protocol ("IP") address used to connect your computer to the Internet;
- Computer, device and connection information, such as browser type and version, operating system, mobile platform and unique device identifier ("UDID") and other technical identifiers;
- Uniform Resource Locator ("URL") click stream data, including date and time, and content you viewed or searched for on a Service;
- Location information for location-aware Services to provide you with more relevant content for where you are in the world.

We may use and disclose automatically collected information for any purpose, except where we are restricted by applicable law. If we combine any automatically collected information with personal information, the combined information will be treated by us as personal information.

We may also use aggregated information for any purpose, however, this information does not identify specific individuals and so is not personal information.

3.3 Cookies and web beacons

The Service may also automatically collect information through the use of cookies or similar technologies, such as web beacons. Cookies are small text files that a website sends to the browser on your computer or mobile device when you first visit a web page so that the website can recognise your device the next time you visit. Most websites typically use the following:

- "Session" cookies, which are temporary and deleted when you close your browser;
- "Persistent" cookies, which remain until you delete them or they expire;
- Web beacons, which are electronic images also known as single-pixel gifs.

In general, cookies, web beacons and similar technologies do not contain personally identifiable information, but when you furnish your personal information through the Service, this information may be linked to the non-personally identifiable data stored in cookies sent to your browser from the Service.

1st Option Safety Group and its service providers use these technologies for various purposes, including: facilitating the login process, administering, customising and improving the Service, personalising the browsing experience; advertising, promotions and surveys, reporting and paying royalties and license fees to third-party providers, such as authors, societies and other copyright holders and content distributors as well as tracking and analysing user preferences and trends.

There are a number of ways to manage cookies. The "help" portion of the toolbar on most browsers will tell you how to stop accepting cookies, how to be notified when you receive a new browser

cookie, and how to disable existing browser cookies. However, if you block cookies, you may not be able to register, login or make full use of the Service. You can also use your mobile device's settings to manage the available privacy options.

Our HTML-formatted emails may contain a web beacon to tell us whether our emails are opened and verify any clicks through to links or advertisements within the email. We may use this information for purposes including determining which of our emails are more interesting to users, to query whether users who do not open our emails wish to continue receiving them and to inform our advertisers in aggregate how many users have clicked on their advertisements. The web beacon will be deleted when you delete the email. Emails in plain text rather than HTML will not include the web beacon.

1st Option Safety Group categorises cookies based on their core function and the kind of personal data the cookie stores (see the table below for more specific information).

Fundamental	These cookies hold no personal data and do not impact your privacy but are essential in enabling key functionality such as ensuring your web browser's back button works. Your consent to allow cookies is not required where only these cookies are used.
Site Feature	These cookies offer useful end-user features such as remembering your login details between sessions, remembering items saved in your shopping basket and remembering personalised site layouts / preferences, etc. Both session and persistent cookie types are used to provide useful site features.
Tracking	Utilise third party tracking and analytics technologies to optimise sites, identify trends, track browsing behaviour, provide preference related marketing and provide functionality such as 'liking' an article, topic, etc.
Not Applicable	"Not Applicable" indicates that the personal data in the applicable classification would not normally be stored in any cookie, but may be collected by a web site and stored in a repository (e.g. a database).

Personal data classification	Cookie classification	Type of data / information collected and processed	Data retention period
Public Data	Not Applicable	Any information about an individual that may be deemed personal but is already available in the public domain or with	Infinity. The information is classified as already in the public domain.

		consent may be published in the public domain.	
Web Browser Session Data	Site Feature	<p>Unique / session identifier</p> <p>Session link</p> <p>Layout preferences</p> <p>Referrer, redirector, click stream</p> <p>Token identifier</p> <p>Server identifier</p> <p>Platform identifier</p> <p>Access information</p>	Up to 6 months retention from last login / request.
Marketing Data	Site Feature	<p>Includes all "Public Data" and "Web Browser Session Data" data plus...</p> <p>Customer / prospect account number.</p> <p>Full name.</p> <p>E-Mail address.</p> <p>Direct mailing address.</p> <p>Telephone numbers.</p> <p>Fax number.</p> <p>3rd party data selling.</p> <p>Preferences.</p> <p>Order information.</p> <p>IP address.</p>	
Third Party Tracking & Analytics	Data Tracking	<p>Third party dependent but may include web browser session data and marketing data.</p> <p>Information is collected by third parties in line with their analytics and tracking policies.</p>	<p>Third party dependent.</p> <p>Information is retained by the third party in accordance with third party analytics and tracking policies.</p>
Financial Data	Not Applicable	<p>Includes "Marketing Data" plus...</p> <p>Customer account / relationship record.</p> <p>Financial record.</p>	7 Year retention from last payment

		Order details. Card payment indicators.	
Sensitive Data	Not Applicable	Includes "Financial Data" plus... Health, religion or racial. National identity number. Human resources employee information. Client sensitive documentation	Where possible, 7 Year retention from last payment. Certain information may be kept indefinitely or otherwise in relation to UK statutory law. For example, information relating to a last will and testament, pension information or a legal contract.

3.4 Third party analytics

The list of third parties below provide tracking and analytics data to Reed. The last known good locations of the websites and privacy policies are also provided and clicking on these will take you to the appropriate sites. Please note that it is your responsibility to visit the applicable third party websites to review any such third party privacy policy and Reed does not accept any liability or responsibility whatsoever for any of the links below being out of date or unavailable.

Third party name	Website (click to visit website)	Privacy policy link
WholsVisiting	https://www.whoisvisiting.com/	http://support.whoisvisiting.com/using-whoisvisiting-com/gdpr-whoisvisiting-compliance
Google Analytics	www.google.com	https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008
MailChimp	www.mailchimp.com	https://mailchimp.com/legal/privacy/
Survey Monkey	www.surveymonkey.com	https://www.surveymonkey.com/mp/policy/privacy-policy/
Twitter	www.twitter.com	https://twitter.com/privacy

Twitter Conversion Tracking	www.twitter.com	https://support.twitter.com/articles/20170514
Wordpress	www.wordpress.com	http://www.eduserv.org.uk/legal/privacy-and-cookies
YouTube	www.youtube.com	http://www.google.com/intl/en/policies/privacy/

You may opt-out of third party web advertising services such that where they provide advertising it will not be as relevant to you. You can also configure your web browser to delete and / or block the use of cookies for any third party. The following sites may be used to register your 3rd party opt-out preferences (you only need to register in one place).

The Network Advertising Initiative industry opt-out: www.networkadvertising.org

The Consumer Choice Page: www.aboutads.info

The IAB UK's industry opt-out (U.K Only): www.youronlinechoices.com

Please note: Clicking the links above will redirect you to the appropriate website.

4. Use of your personal information

We use the personal information collected through the Service to complete various actions:

- to assist you in completing and to fulfill a transaction or order;
- to provide, modify and improve service and support;
- to update you on relevant new services and benefits;
- to personalise the Service and to select content to be communicated to you or to use features on the Service such as sharing content with a friend or colleague;
- to contact you regarding our products or services or other products and services from third parties;
- to invite you to participate in surveys, sweepstakes, competitions and similar promotions;
- for data analysis, audits, developing new products, enhancing the Service, identifying usage trends and determining the effectiveness of our promotional campaigns, or in other ways to which you have expressly agreed in a customer agreement with us;
- to prevent and detect security threats, fraud or other malicious activity;
- to comply with our legal obligations, resolve disputes, and enforce our agreements.

We may on occasion also match or combine the personal information that you provide with information that we obtain from other sources or that is already in our records, whether collected online or offline or by predecessor or affiliated group companies, for the purposes described above.

5. Sharing or disclosing your personal information

We share your personal information in the following ways:

- **Affiliates.** Your personal information may be accessible to all 1st Option affiliated companies worldwide for the purposes described in this policy.
- **Agents, representatives, sponsors, societies and business partners.** Your personal information may be accessible to our agents, representatives, sponsors and entities for which we are acting as an agent, licensee, joint venturer or publisher.
- **Service providers.** Your personal information may be accessible to our service providers and suppliers, which assist us with producing and delivering our products and services, operating our business, and marketing, promotion and communications. These providers and suppliers include, for example, editors, reviewers, credit or debit card processors, customer support, email service providers, IT service providers, financial services and shipping agents.
- **Institutional subscribers.** If the Service offers a content database or online learning service ("Subscription Service") and you access the Subscription Service through an institution-sponsored subscription, your personal information and certain usage data gathered through the Subscription Service, such as the number of items you downloaded, any non-subscribed items you accessed, and test scores, may be shared with your institution for the purposes of usage analysis, subscription management, course management, and testing and remediation. If your institution is a corporation or other business entity, additional usage data, such as the types of records you viewed and the number of searches you ran, also may be shared for the purposes of cost attribution and departmental budgeting.
- **Other third parties:** We may share personal Information with other third parties if we expressly told you about such potential disclosure at the point at which you submitted the Information to us.
- **Compliance with law and similar obligations.** We may share personal information in order to: (i) respond to or comply with any law, regulation, subpoena or court order; (ii) investigate and help prevent security threats, fraud or other malicious activity; (iii) enforce and protect the rights and properties of 1st Option or its affiliates; or (iv) protect the rights or personal safety of our employees and third parties on or using our property.
- **Change in corporate circumstances.** If 1st Option Group, the Service or a related asset or line of business is acquired by, transferred to or merged with another company, your personal information may be disclosed to the prospective or actual purchasers.

The Service also may provide access to social media features, message boards, chat, forums, blogs, profile pages and other services to which you are able to post personal information and materials.

Any information you post or disclose through these services is public. Please be careful when disclosing personal information in these public areas.

6. Children's privacy

We do not knowingly collect information from children under the age of 13 and 1st Option Group does not target its websites to children under 13.

7. Your choices and selecting your privacy preferences

You can manage available communications preferences by using the "opt-out" or unsubscribe mechanism or other means provided within the communications that you receive. We reserve the right to notify you of changes or updates to the Service whenever necessary.

8. Access to and accuracy of your personal information

You may request access to the personal information we hold about you. You may also request to review and correct any of that personal information. The Service may allow registered users to directly access their registration information and make corrections or updates. The accuracy of such information is solely the responsibility of the user.

To protect your privacy and security, we will also take reasonable steps to verify your identity. To view and change the personal information that you directly provided to us, you can return to the Web page where you originally submitted your data and follow the instructions on that Web page, or contact us at the address listed below.

9. Data Security

We use a variety of data security measures intended to ensure the confidentiality, and integrity of your personal information.

10. Changes to privacy policy

If we modify this privacy policy, we will post the revised version here, with an updated revision date.

11. Cross-border transfer of personal information

Your personal information may be transferred to other countries for processing, which may have different personal data protection rules than in your country. Where we transfer your data outside the EEA, we ensure adequate protection remains in place, including through the use of EU model clauses.

12. Contacting us

If you have comments or questions about this privacy policy or our processing of your information, please contact:

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