

INFINITY GLOBAL PRIVACY NOTICE

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Ours is a collaborative e-Commerce platform in an interactive environment. You can use our platform to choose a learning course, complete the learning and get yourself assessed for a skill or a job. You can also avail of other learning opportunities available within the platform. When you share information with us and use our services, we want you to be clear how we're using information and the ways in which your privacy is protected.

Our Privacy Notice explains:

What information we collect and why we collect it. How we use that information. The choices we offer, including how to access and update information.

Your privacy matters to Infinity Global so whether you are new to the Learning Platform or a longtime user, please do take the time to get to know our practices – and if you have any questions contact us.

While we have tried to keep this document simple, there may be terms you are unfamiliar with. Please read about them before giving your consent.

Information we collect

We collect information to provide better services to all of our users. We collect information in the following ways:

Information you give us. For example, our services require you to sign up for a learning module. When you do, we'll ask for personal information, like your first and last name, email address, guardian details if you are a minor to store with your account and your time zone information if you need to see system records as per your own time.

Information we collect by automated means. When you visit our Sites, we may collect certain information by automated means, using technologies such as cookies, web server logs, web beacons and JavaScript. Our Sites are not designed to respond to "do not track" signals received from browsers.

- **Information we get from your use of our services.** We collect information about the services that you use and how you use them, like the name of the learning module, the duration of the course, interactions with the learning community, the scores/grades that you achieve while completing the course etc.
- **Device information.** We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). The platform may associate your device identifiers or phone number with your Learning account.
- **Log information.** When you use our services or view content provided by INFINITY GLOBAL, we automatically collect and store certain information in server logs. This includes details of how you used our service, such as your search queries, Internet protocol address, device event information such as crashes, system activity (for example when you joined a particular community, what posts you created/edited etc., any remarks by Admins on your activities), hardware settings, browser type and browser language, the date and time of your request and referral URL.
- **Location information.** When you use our services, we may collect and process information about your actual location.
- **Local storage.** We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

Cookies and similar technologies. Cookies are files that websites send to your computer or another Internet-connected device to uniquely identify your browser or to store information or settings on your device. Our Sites may use cookies such as HTTP cookies. Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. Please note, however, that without cookies you may not be able to use all the features of our Sites.

Other. We may use third-party web analytics services on our Sites, which help us analyse how users use the sites. The information collected for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers.

We may use third-party plug-ins on our Sites, such as social sharing tools. The providers of these plug-ins may use automated means to collect information regarding your use of the Sites if you choose to interact with the plug-ins. This information (together with any additional information you submit using the plug-ins) is collected directly by the provider of the applicable plug-in and is subject to the privacy policies of that provider.

Information we collect when you are signed into our learning platform, in addition to information we obtain about you from partners, may be associated with your Learning Account. For more information about how you can access, manage or delete information that is associated with your Learning Account, visit the Transparency and Choice section of this notice. We may also use your unique identifier (like employee number) only in case some integration is required with your parent organisation's legacy systems.

How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect INFINITY GLOBAL and our users. We also use this information to offer you tailored content – like giving you more relevant search results.

Public aspects of your learning profile such as name and photo are shared with other users within the social aspects of our platforms.

When you contact us, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements. We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer.

Our automated systems analyse your content (including emails that you send to us) to provide you personally relevant product features, such as customised search results, tailored advertising, and spam and malware detection.

INFINITY GLOBAL processes your personal information on our AWS services in Ireland. Encrypted personal information may further be passed on to our servers in other countries around the world for the purpose of business continuity, upgrades and testing. This will mean your personal information may be securely processed on a server located outside the country where you live.

Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

Review and update your profile. Review and control certain types of information tied to your Account.

You may also set your browser to block all cookies, including cookies associated with our services. However, it's important to remember that many of our services may not function properly if your cookies are disabled. For example, we may not remember your language preferences.

Information you share

Our services let you share information with other users on the platform.

Accessing and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others.

We provide access to your information and correction of erroneous data to support your rights, as embodied in legislation. We aim to maintain our services in a manner that protects information from accidental or malicious destruction.

Information we share

We do not share personal information with companies, organisations and individuals outside of INFINITY GLOBAL unless one of the following circumstances applies:

With your consent

We will share personal information with companies, organisations or individuals outside of INFINITY GLOBAL when we have your consent to do so.

With domain administrators

If your Learning Account is managed for you by a domain administrator, then your domain administrator who provides user support to your organisation will have access to your Learning Account information (including your email and other data). Your domain administrator may be able to:

View statistics regarding your account, change your account password, suspend or terminate your account access, access or retain information stored as part of your account, receive your account information in order to satisfy applicable law, regulation, legal process or enforceable governmental request and restrict your ability to delete or edit information or privacy settings, subject to compliance with applicable law.

For external processing

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Notice and any other appropriate confidentiality and security measures. For example, some of the user contact details (email and mobile number) are shared with the platform payment service provider for financial compliance purposes.

To fulfill our contract with you

To provide you with our training and recruitment services we may share your data with our training partners and the employers we connect you to. We ensure our data processors apply data protection standards in accordance with this policy. To request further detail on who your information is shared with, as part of your specific service, please contact us: support@infinityglobal.io

As part of your Academy

If you are a member of a sponsored academy INFINITY GLOBAL will act as the data processor and your academy sponsor the data controller. We will process your data in accordance with this policy and also the agreement in place with your academy sponsor.

Territory

INFINITY GLOBAL is a UK company operating primarily in Europe. As such we apply GDPR as our primary standard of data processing. When operating in non-European territories to support our academy sponsors, we will ensure local data protection laws are followed.

For legal reasons

We will share personal information with companies, organisations or individuals if we have a good faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

Meet any applicable law, regulation, legal process or enforceable governmental request, enforce applicable Terms of Service, including investigation of potential violations, detect, prevent, or otherwise address fraud, security or technical issues, protect against harm to the rights, property or safety of INFINITY GLOBAL, our users or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

We also would like to state that any “Postings” created by you on the INFINITY GLOBAL PLATFORM (“Postings” include all the content submitted, posted, published or shared in the platform, including but not limited to all posts, notes, questions, comments, videos and file uploads), will conform to all applicable local, state, national and international laws, rules and regulations, including copyright laws, and will also be the property of the community owner on the platform.

Once you post, you agree in effect to share with “INFINITY GLOBAL” the right to show it elsewhere (like in a Google Search). It's important for any service that deals with user data to have such terms, since “INFINITY GLOBAL” needs a license to be able to show the content that users own, on the site and elsewhere. However, you do keep owning the content, and have the rights to publish it elsewhere (On your personal blog or website, modify it, send it to other people, etc.)

If INFINITY GLOBAL is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy Notice.

Information security

Information Security

We work hard to protect INFINITY GLOBAL and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information we hold.

In particular:

We encrypt all of our services using Secure Sockets Layer (SSL). We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems. We restrict access to personal information to INFINITY GLOBAL employees, contractors and agents who need to know that information in order to process it

for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Children and the Learning Platform

If you are a minor, you may use the Learning platform only with the consent of a parent or guardian.

When this Privacy Notice applies

Our Privacy Notice applies to all of the services offered by INFINITY GLOBAL and its affiliates but excludes services that have separate privacy policies that do not incorporate this Privacy Notice.

Our Privacy Notice does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results or other sites linked from our services. Our Privacy Notice does not cover the information practices of other companies and organisations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Notice. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes

Our Privacy Notice may change from time to time. We will post any Privacy Notice changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy Notice changes). We will also keep prior versions of this Privacy Notice in an archive for your review.

Retention Policy:

Our data retention policy is governed in compliance to local laws concerning GDPR.

1 - Basic details: Student names, the modules and qualifications studied and their outcomes. Records and data which need to be retained whilst a student might continue to study with us. These will be retained for the 'life of student' (which is taken to be 120 years from date of birth)

2 - Contact Details (6 Years):

There is a legal/contractual requirement to keep records and data relating to fee payment, registration, etc. for six years after the student has completed or withdrawn from the module or programme

There are cases where it is necessary to keep records of student support for 6 years to inform ongoing contact with students. This includes careers support, study issues advice, research student support, and course choice. For example, if somebody calls INFINITY GLOBAL Service Desk from their mobile, then the customer support person should be able to find them in the system and support them

3 - Operation Records (3 Years)

Data relating to the learner as a user of support services or day to day administration e.g.: Site visit related information, attendance information, where these records are kept on a central electronic system. These will be retained for 3 years.