

## **INTRODUCTION**

Welcome to the Eequ privacy policy.

Eequ Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website or use our platform and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [LINK]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

Some headlines about Eequ's use of data:

We build a learning profile about children for whom mentor experiences are booked on Eequ. This helps parent and children keep track of their experiences, and helps us suggest potential new mentoring experiences which might complement them.

We want to foster a sense of local community on Eequ. We intend to develop functionality that will allow us, with your express permission, to share the fact that your child is booked for a certain mentor experience with other parents/guardians in your area who visit the same mentor listing.

We will delete your Eequ account on request, but if you are a mentor you will still appear on the learning profiles of children who have made bookings for your experiences previously.

We intend to develop functionality to determine whether any of your friends or contacts have connections with any mentors on Eequ, and, with your express permission, notify other users of your connections with mentors on Eequ.

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### 1. Important information and who we are

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how Eequ Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you register, submit a listing for a mentor experience, or make a booking for a mentor experience. It applies to visitors to our website, customers booking mentor experiences (Customers), mentors providing those experiences, or their staff (Mentors), and students booked to attend mentor experiences (Students).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### **Controller**

Eequ Ltd is the controller and responsible for your personal data (collectively referred to as Eequ, "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise [*your legal rights*], please contact the DPO using the contact details set out below.

#### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Eequ Ltd

Email address: [privacy@eequ.org](mailto:privacy@eequ.org)

Postal address: The Yard, Lewes Rd, Forest Row, E. Sussex, RH18 5AA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 7th October 2018. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **Children**

We are especially concerned to protect the privacy of Students. We do not collect any information from Students, and request authority from their parent/guardian (as Customer) before processing any personal data regarding Students. We are also required to make reasonable efforts (using available technology) in these circumstances to verify that consent provided on behalf of a Student has, in fact, been provided by the holder of parental responsibility for that child.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- receiving marketing from us and our third parties and your communication preferences.
- **Facebook/Google Log In Data** will be collected by us if you choose to connect your account on Eequ. **Mentor Identity Data** includes [first name, last name, username or similar identifier, date of birth, relation to Student].
- **Mentor Contact Data** includes [billing address, delivery address, email address and telephone numbers].
- **Customer Identity Data** includes [first name, maiden name, last name, username or similar identifier, title, date of birth and gender].
- **Customer Contact Data** includes [billing address, delivery address, email address and telephone numbers].
- **Student Identity Data** includes [first name, last name, username or similar identifier, date of birth, relation to Customer].
- **Mentor Financial Data** includes Mentors' bank account and payment card details (we only retain the last four digits and send the complete details directly to Stripe, the payment service provider integrated with Eequ, via an encrypted token.).

- **Mentor Confidence Data** means a reviews of mentors by customers, and a rating we derive for Mentors from social media, reviews on the Eequ platform, and endorsements.
- **Transaction Data** includes details about payments to and from you in relation to bookings made on Eequ.
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].
- **Mentor Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback on Mentor sessions and survey responses].
- **Customer Profile Data** includes [your username and password, bookings made by you, cancellations of bookings made by you, preferences, feedback and survey responses].
- **Student Profile Data** includes a profile of Students' learning and dietary preferences and requirements, feedback on Mentor sessions, and survey responses, and data derived from analysis of that information by us using analytics tools (including, with your explicit advance consent, psychometric profile data).
- **Student Learning Portfolio** comprised of a record of sessions attended by you in relation to bookings on Eequ, and may include documents, images and/ or recordings of you attending Mentors' learning or leisure experiences.
- **Usage Data** includes information about how you use our platform.
- **Marketing and Communications Data** includes your preferences in qu to your Facebook or Google account, we may receive information from them about you. For example, we may receive information like your public profile, email address, friends list and likes. You can stop Facebook or Google sharing the information with us by removing our access to Facebook or Google.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users who engage mentors on a repeat basis, or the ratio of students who attain a certain level of learning progress in respect of certain types of mentor experience. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel any registration you have with us but we will notify you if this is the case at the time.

## 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Mentor Financial Data (given to Stripe, our payment processor) by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Make or accept bookings on Eequ;
  - create an account on our website;
  - subscribe to our newsletter or promotional updates;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Our use of data analytics tools.** We analyse Student Profile Data to derive suggestions and recommendations for potentially suitable Mentor experiences, as well as courses, apprenticeships or other educational opportunities.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below :
  - Transaction Data from Stripe, the payment services provider integrated into Eequ.
  - Data from social networks such as LinkedIn, for the purpose of building a Mentor Confidence Score.
  - With the consent of the Customer, we receive from the relevant Mentor image and recordings of the Student at the Mentor experience to put in their Student Learning Portfolio.
  - Transaction data as well as customer and mentor contact data from Intercom our chat bot for the purpose of responding to your queries and developing our information resources. We also use this data to prompt you at various stages in the registration, listing or booking journey..

## 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you on the basis of our Mentor or Customer Terms and Conditions.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Click here [[LINK TO GLOSSARY, LAWFUL BASIS](#)] to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before processing any sensitive personal data. Sensitive data means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. We will also ask for your consent to send third party direct marketing communications to you via email. You have the right to withdraw consent at any time by contacting us.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new Customer or Mentor	(a) Identity (b) Contact (c) Facebook/Google Login Data	Performance of a contract with you
To process your booking on Eequ	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests

	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review about a Mentor experience, or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how Mentors and Customers use our service)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our Eequ services, to develop them and grow our business)
To enable us to identify other Customers, Mentors and Students who live nearby you, so that we can support community building and provide suggestions to you that might be convenient to your schedule.	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to foster a community ethos among our user base.)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our Eequ services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, Eequ services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of students, customers and mentors for our Eequ services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To use data analytics to make recommendations or suggestions regarding potentially suitable experiences or opportunities for Students.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) Transaction	
To make suggestions and recommendations to you about goods or services (such as new mentors) that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our Eequ services and grow our business)

**Promotional communications from us**

We may use [Identity, Contact, Technical, Usage and Profile Data] to form a view on what we think A Student may want or need, or what may be of interest to a Customer or Student.

You will receive communications from us suggesting or promoting specific opportunities if you have requested information from us.

**Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.



## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies policy.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- If you are a Customer or a Student, we share your data with Mentors to the extent necessary to facilitate and administer your booking.
- If you are a Student, the fact that you have been booked to attend a particular Mentor experience will be visible to others viewing the Mentor's listing for that experience.
- If you are a Mentor, we share your data with visitors to the Eequ website so that they can view your listing; we also share your data with Customers and Students to the extent necessary to facilitate and administer your booking.
- Stripe, the payment services processor integrated with Eequ, based in the EU and the USA.
- Intercom, based in the USA, who power our chat bot.
- Google, who provide hosting services in the UK for Eequ.
- Slack, based in the USA, which we use to convey messages internally at Eequ.
- Sendpulse, our email service provider based in the USA.

- DigitalOcean, who provide cloud servers in the UK for Eequ.
- Service providers acting as processors, based in India, who provide IT and system administration services.
- In the event that we integrate an insurance provider for Eequ mentor experiences, we may provide certain information to them to help set up your account with them.
- Professional advisers including lawyers, bankers, auditors and insurers based in who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Any specific third parties listed in the table [*Purposes for which we will use your personal data*] above.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

## 6. International transfers

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: [Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers (such as our Indian IT support team), we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: [Model contracts for the transfer of personal data to third countries](#).
- Where we share data with partners based in the US (such as Stripe and Intercom), we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

[By law we have to keep basic information about Mentors and Customers (including Transaction Data) for six years after they cease being customers for tax purposes.]

In some circumstances you can ask us to delete your data: see [*your legal rights*] below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [\[Request access to your personal data\]](#).
- [\[Request correction of your personal data\]](#).
- [\[Request erasure of your personal data\]](#).
- [\[Object to processing of your personal data\]](#).
- [\[Request restriction of processing your personal data\]](#).
- [\[Request transfer of your personal data\]](#).
- [\[Right to withdraw consent\]](#).

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

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 is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **Lawful Basis**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience on Eequ. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Eequ service to you. We will advise you if this is the case at the time you withdraw your consent.