

# PRIVACY POLICY (Updated on 1<sup>st</sup> April 2024)

## INTRODUCTION

Healthcare Trainers Network Ltd, is registered in the United Kingdom - No: 13045054 with its registered business address located at 27 Gloucester Street, London WC1N 3AX; as Data Controllers are firmly committed to the protection of your privacy and takes their responsibility regarding the security of customer information very seriously.

This Policy sets out how we collect, use and secure the personal information of individuals using any website owned by us.

This is the Privacy Policy governing your use of the domain names [www.healthcaretrainersnetwork.com](http://www.healthcaretrainersnetwork.com), [www.healthcaretrainersnetwork.co.uk](http://www.healthcaretrainersnetwork.co.uk), [www.htnuk](http://www.htnuk) ("**the Sites**"). This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a subscriber and through your use of our website, and online services;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- And how we comply with the data protection rules.

Our Privacy Policy reflects the requirements of the United Kingdom's privacy legislation as well as our continuous commitment to protecting your personal information in line with best practice international standards and protocols such as the GDPR.

All terms not defined in this document have the meanings ascribed to them in the Terms of Use Agreement between you and **the Sites**.

This policy explains our data processing practices and your options regarding the ways in which your personal data is used. By registering, placing an order, downloading information, or entering our site (as defined below) you consent to the collection and use of your information under the terms of this policy.

## THE INFORMATION WE COLLECT

### Personal Data

Personal data means any information relating to you which allows us to identify you, such as your name, address, employer, contact details, payment details (if applicable) and information about your access to our website.

We collect personal data from you when you contact us directly to enquire about or to subscribe for our services either electronically or by post.

Specifically, we may collect the following categories of information:

- a. Name, business or home address, e-mail address, telephone number,

- b. Information about your use of our website;
- c. The communications that you may exchange with us or direct to us via letters, emails, chat service, calls, and social media.
- d. Location, including real-time geographic location of your computer or device through GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, if you use location-based features and turn on the Location Services settings on your device and computer. (Personal Information)

#### Registration (Subscription) Information

At the time if you register to become a Registered User of **the Sites**, you will be asked to complete a registration form which requires you provide information such as your name, company details, address, phone/fax number, email address and other personal information as well as information about your preferences and interests.

#### Publishing Information

If you submit any information to **the Sites** to be published on the Sites through the publishing tools and any discussion forum, then you are deemed to have given consent to the publication of such information.

#### Payment Information

If you purchase a product or service from **the Sites** or a vendor available through **the Sites** we may be required to collect additional information, including billing information, credit card numbers and expiration dates and tracking information from cheques or money orders.

#### Statistical Information:

In addition, we gather aggregate statistical information about our Sites and Users, such as IP addresses, browser software, operating system, pages viewed, and number of sessions, unique visitors and so forth.

#### Collected Information

Publishing Information, Payment Information, Statistical Information, and any information we may collect from you through the use of cookies or any other means.

#### HOW WE USE YOUR INFORMATION

We may use your Information to provide services that you request or to contact you regarding additional services about which the Site thinks that you might be interested in. Specifically, we may use your email address, mailing address, phone number or fax number to contact you regarding notices, surveys, product alerts, new service or product offerings and communications relevant to your use of our Sites. We may generate reports and analysis based on the Registration Information for internal analysis, monitoring, and marketing decisions.

We use your Collected Information to improve our marketing and promotional efforts, to statistically analyse site usage, to improve our content and product offerings and to customize our Sites' content, layout and service specifically for you.

We may use your Collected Information to service your Account with us, including but not limited to investigating problems, resolving disputes, and enforcing agreements with us.

We may use your Collected Information to execute marketing campaigns, promotions, or advertising messages on behalf of third parties; however, in these circumstances, your Collected Information **will not** be disclosed to such third parties unless you respond to the marketing, promotion or advertising message.

All of your Publishing Information will be publicly available on the Sites and therefore accessible by any internet user. Any Publishing Information that you disclose to the **Sites** by definition becomes public information and you relinquish any proprietary rights (including but not limited to the rights of confidentiality and copyrights) in such information. You should exercise caution when deciding to include personal or proprietary information in the Publishing Information that you submit to us. Any information disclosed herein is as a result of your decision to make public this information.

**The Sites** will share your Payment Information with banks or vendors relevant to the transaction in order to enable transactions to be completed. Any credit card information that you provide through the Site is directly submitted to a payment server of the credit card processing bank. **The Sites does not** maintain electronic or physical copies of your credit card information. While **the Sites** has in place up-to-date technology and internal procedures to guard your Payment Information against intruders, there is no guarantee that such technology or procedure can eliminate all of the risks of theft, loss or misuse **the Sites** shall not be liable to you or any other person for any damages that might result from unauthorized use, publication, disclosure or any other misuse of Payment Information, including credit card information.

We use Statistical Information to help diagnose problems with and maintain our computer servers, to manage our Site, and to enhance our Site and services based on the usage pattern data we receive. We may generate reports and analysis based on the Statistical Information for internal analysis, monitoring and marketing decisions. We may provide Statistical Information to third parties, but when we do so, we do not provide personally identifying information without your permission.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

## **YOUR CONSENT**

By providing us with your personal information, you consent to our collection, use and disclosure of that information as described in this Statement as amended from time to time or as described at or before the time of collection, use or disclosure, as the case may be. If you do not want your personal information to be collected, used or disclosed in this manner, then please either:

- do not submit your personal information to us;
- exercise opt-out procedures described above or as may be offered at the time of collection, or
- refrain from exercising opt-in procedures described above or as may be offered at the time of collection.

If you have submitted personal information to us and wish to withdraw your consent to its retention, use or disclosure, please send an e-mail to [info@healthcaretrainersnetwork.co.uk](mailto:info@healthcaretrainersnetwork.co.uk)

You may withdraw your consent, subject to legal or contractual restrictions and reasonable notice. However, If you withdraw your consent, we may not be able to provide some products or services to you.

## DISCLOSING YOUR INFORMATION

We do not sell, rent, trade, or exchange any personally identifying information of our Users. We may share certain aggregate information based on analysis of Collected Information with our partners, customers, advertisers, or potential Users.

However we reserve the right to disclose your Collected Information to relevant authorities where we have reason to believe that such disclosure is necessary to identify, contact or bring legal action against someone who may be infringing or threatening to infringe, or who may otherwise be causing injury to or interference with, the title, rights, interests or property of the Site, our Users, customers, partners, other web site users or anyone else who could be harmed by such activities.

We also reserve the right to disclose Collected Information in response to a subpoena or other judicial order or when we reasonably believe that such disclosure is required by law, regulation, or administrative order of any court, governmental or regulatory authority.

If we have reason to believe that a User is in breach of the Terms of User Agreement or any other agreement with us, then we reserve the right to make public or otherwise disclose such User's Collected Information in order to pursue our claim or prevent further injury to the **Site**, its proprietors or others.

## CO-BRANDED RELATIONSHIPS

We have established relationships with other parties to offer you the benefit of other products and services which we ourselves do not offer. We offer you access to these other parties either through the use of hyperlinks to their sites from our Site, or through offering "co-branded" sites in which both ourselves and these other parties share the same uniform resource locator, domain name or pages within a domain name on the Internet. In some cases, you may be required to submit information for purposes of registering or applying for products or services provided by such third parties or co-branded partners. The privacy policy of such other parties may differ from ours, and we may not have any control over the information that you submit to such third parties or co-branded sites. We therefore encourage you to read that policy before responding to any offers, products or services provided by such other parties.

## COOKIES AND SITE TRACKING

We may use "cookies" to store specific information about you and track your visits to our Site. It is not uncommon for websites to use cookies to enhance identification of their users.

A "cookie" is a small amount of data that is sent to your browser and stored on your computer's hard drive. A cookie can be sent to your computer's hard drive only if you access our Site using the computer. If you do not de-activate or erase the cookie, each time you use the same computer to access our Site, our web servers will be notified of your visit to our Site and in turn we may have knowledge of your visit and the pattern of your usage.

Generally, we use cookies to identify you and enable us to access your Registration Information, Publishing Information or Payment Information so you do not have to re-enter it; gather statistical information about usage by Users; research visiting patterns and help target advertisements based on

User interests; assist our partners to track User visits to the Site and process orders; and track progress and participation in promotions.

You can determine if and how a cookie will be accepted by configuring your browser's which is installed in the computer you are using to access the Site. If you desire, you can change those configurations in your browser. By setting your preferences in the browser, you can accept all cookies, you can be notified when a cookie is sent, or you can reject all cookies. If you reject all cookies by choosing the cookie-disabling function in your browser, you may be required to re-enter your information on our Site more often and certain features of our Site may be unavailable.

## MINORS

The Site and its contents are not intended to be targeted to minors under applicable law and we do not intend to sell any of our products or services to minors. However, we have no way of distinguishing the age of individuals who access our Site and so we carry out the same Privacy Policy for individuals of all ages. If a minor has provided us with personal information without parental or guardian consent, it is the responsibility of the parent or guardian to contact us to remove the information from our records.

## SECURITY OF YOUR DATA

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction, or damage. The data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

All payment details are transmitted over SSL across dedicated network infrastructure (Multiprotocol Label Switching-MPLS) and stored in compliance with Payment Card Industry Data Security Standards (PCI DSS)

As a Registered User, your Registration Information, Publishing Information and Payment Information (if any) can be viewed and edited through your Account which is protected by Password. We recommend that you do not divulge your Password to anyone. Our personnel will never ask you for your Password in an unsolicited phone call or in an unsolicited e-mail. If you share a computer with others, you should not choose to save your log-in information (e.g., User ID and Password) on the computer. Remember to sign out of your Account and close your browser window when you have finished your session.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. However, we require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with data protection rules.

## CHANGES TO PRIVACY POLICY

Any changes to this Privacy Policy will be communicated through our posting an amended and restated Privacy Policy on our Site. Our posting the amended and restated Privacy Policy will make such new Privacy Policy immediately effective. You agree that all Collected Information (whether or not collected prior to or after the new policy became effective) will be governed by the newest Privacy Policy then in effect. If you do not agree to the new changes in our Privacy Policy, you should contact **the Site** in writing (at the address set out in the Notice provision of the Terms of Use Agreement) and specifically request that **the Site** return and/or

destroy all copies of all or part of your Collected Information in possession of the Site . This Privacy Policy was last amended on 1<sup>st</sup> April 2024.

#### CORRECTING YOUR INFORMATION

To update or correct your information, please send an email to [info@healthcaretrainersnetwork.co.uk](mailto:info@healthcaretrainersnetwork.co.uk)

#### YOUR FEEDBACK

We welcome your continuous input regarding our Privacy Policy, or our services provided to you. You may send us your comments and responses to [info@healthcaretrainersnetwork.co.uk](mailto:info@healthcaretrainersnetwork.co.uk)