

THE DIFFERENCE – PRIVACY POLICY

This Privacy Policy describes the policies and procedures followed by The Difference Education Ltd (“**The Difference**”, “**we**”, “**our**” or “**us**”) regarding the collection, use and disclosure of your personal data when you visit www.the-difference.com and any sub-domains (the “**Website**”), or otherwise interact with The Difference. For the purposes of UK data protection laws, The Difference is the data controller of your personal data.

Please read this Privacy Policy carefully in order to understand our views and practices regarding your personal data and how we will treat it. Please note that when using the Website, or otherwise, interact with The Difference, this Privacy Policy should be read in conjunction with our Terms of Use.

Collection of Personal Data. When you visit this Website, receive services from us or otherwise interact with us, we may collect the following data about you:

Information that you give to us – You may give us personal data including your name, contact details including email address, telephone number, location and job title when you contact us (using the ‘Register your interest to find out more about the work of The Difference’ form or by emailing us), as well as any other personal data you choose to provide as part of your submission. You are not under any obligation to provide any of this information. However, if you withhold requested information, we may not be able to accept or progress your submission of interest or respond to your communications more generally.

Information that we collect about you – We automatically collect basic technical information from all visitors to the Website through our automatic data collection tools, which will include cookies and other commonly used technologies. These tools collect certain standard information that your browser sends to the Website such as your browser type and language, access times, and the address of the site from which you came to the Website. They may also collect information about your Internet Protocol (“IP”) address, or click stream data within our Website (i.e. the actions taken in connection with the website). This information helps us improve the functionality of the website.

Our use of cookies – We use cookies in a range of ways to improve your experience on our website, including the following:

- To understand how you use the website and embedded content, to inform future changes and improvements.
- To track the performance of our advertising campaigns
- To embed content from third parties like Twitter and YouTube.

You can edit your cookie preferences at any time by opening the cookie preference manager, by clicking the ‘lock’ icon in the bottom left-corner of our website.

The following providers set cookies on our website:

Provider	Purpose	Their privacy and cookie policies
Squarespace	Our website is built and hosted by Squarespace. The platform sets functional and necessary first party cookies for operation of the website, including logins and security.	Link
Google Analytics	We use Google Analytics cookies to collect information about how you interact with our website, including how you reached it, which content you interacted with and information about the device you used, including browser type/version and operating system. We collect your IP address to understand your general location, but this is not accessible to use in reporting.	Link
Google Tag Manager	We use Google Tag Manager to manage the analytics and advertising tags we deploy. This controls the analytics information we collect, and removes the last digits of your IP address, restricting our visibility of your location to region level.	Link
Hotjar	We use Hotjar analytics to collect anonymised information on how you use our website, including which areas of the site you engaged with. We cannot see who you are, and after processing, no IP addresses are stored.	Link
Iubenda	We use Iubenda to power our cookie banner. Their banner sets functional cookies to store your cookie preferences, and controls the scripts that are permitted to run on our website.	Link
YouTube	We host some of our videos with YouTube. We use their embedded video player to display this content, which sets cookies to record preferences, watch history (if you're logged into Google), and collect analytics information.	Link
Twitter	Twitter sets cookies to track usage information of Twitter feeds and content embedded on our website.	Link

Use of your Personal Data. We may use the personal data you give us to carry out the following purposes:

Purpose	Lawful Basis
To contact you and to respond to your requests and enquiries when you contact us, or submit a 'Register your interest to find out more about the work of The Difference' form	We have a legitimate interest to respond to your requests and enquiries for ongoing business administration
To deliver services to you	To manage and perform our contract with you
For recruitment purposes	We have a legitimate interest to consider an applicant for a role or vacancy in accordance with our recruitment process
To send you our newsletter/bulletin	Where we have received your consent
For business administration, including statistical analysis	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
To personalise your visit to the website and to assist you while you use the website	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
To improve the website by helping us understand who uses the website	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
For fraud prevention and detection and to comply with applicable laws, regulations or codes of practice	To comply with our legal obligations

You have a right to object to processing of your personal data where that processing is carried out for our legitimate interest.

Sharing your Personal Data. We may use selected third parties to provide us with services or technical support for the Website who may have access to your personal data. All service providers are permitted to use data only for the purpose of performing services on our

behalf. We may also share your personal data with our business and events partners. Similarly, we may share your personal data as required by law to protect our rights and property, or the rights, property or safety of others, including to advisers, law enforcement agencies, judicial and regulatory authorities.

International Transfer. When you are based in the EU/UK, personal data collected from you, including via the Website may be transferred to certain recipients located outside the EU/UK, which do not provide a similar or adequate level of protection to that provided by countries in the EU/UK. You hereby consent to the transfer of your personal data to recipients as described in this Privacy Policy which are located outside of the EU/UK. You may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Security. The security of your personal data is important to us. We take reasonable steps, consistent with generally accepted industry standards, including technical, administrative and physical safeguards to protect the personal data submitted to us from loss, misuse and unauthorised access, disclosure, alteration and destruction. However, no method of security or transmission over the Internet is entirely secure. You should always use caution when transmitting personal data over the Internet.

Retention. We may retain the information relating to you as necessary for the provision of the services, internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements (e.g. settlement). The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

Rights of Individuals. You may have certain data privacy rights which may be subject to limitations and/or restrictions. These rights include the right to: (i) request access to and rectification and erasure of your personal data; (ii) obtain restriction of processing or to object to processing of your personal data; and (iii) ask for a copy of your personal data to be provided to you, or a third party, in a digital format. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority. If you would like to exercise any of these rights, please feel free to contact info@the-difference.com

Marketing. Where you have requested it, we may contact you by e-mail to provide information regarding events, products, services and content that may be of interest to you via our newsletter, unless you inform us that you do not wish to receive marketing communications from us. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent. If you wish to stop receiving marketing communications from us, or would like to stop processing your personal data in any other

way, you can contact us as described below to let us know what types of communications you wish to stop receiving.

Revisions to this Privacy Policy. We may revise or supplement this Policy from time to time. If we make any substantial changes in the way we use or share your personal data, we will notify you by posting a notice on our Website, prior to the change becoming effective. We encourage you to refer to this Policy on an ongoing basis so you understand our current privacy practices.

External Links. The Website may, from time to time, contain links to external sites operated by third parties. We are not responsible for these third party sites or the content of such third party sites. Once you have left the Website, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement for the Website you visit.

Contact Us. If you have any questions or comments about our Privacy Policy, or if you wish to exercise your rights as described above, please feel free to contact info@the-difference.com.