

### **Programme start date**

A learner can register for our programmes at any time in the month. A learner will be liable to pay for the registration fees detailed on our website.

### **Payment terms and billing**

A learner signing up to our programmes via the website will be granted online access as soon as they register or when the programme start date is and payment details have been entered.

You will be asked to provide a credit, charge or debit card number from a card issuer that we accept in order to activate your Subscription or Programme. In this section you are also authorising to comply with the terms of any third-party companies we use to accept payment.

You hereby authorise us to charge your specified payment method on a monthly basis, in advance, for recurring Subscriptions, and to charge in advance for any Programme based or other subscription models, and/or to place a hold on your payment method with respect to any unpaid charges for Subscriptions. You authorise the issuer of your selected payment method to pay any amounts described herein without requiring a signed receipt. You authorise us to continue to attempt to charge and/or place holds with respect to all sums described herein, or any portion thereof, to your payment method until such amounts are paid in full. You agree to provide updated payment information upon request and any time the information you previously provided is no longer valid. You acknowledge and agree that Ultima Cleaning Academy Ltd, will not have any liability whatsoever for any insufficient funds or other charges incurred by you as a result of attempts to charge or place on hold your specified payment methods.

You agree to pay us, through our payment processors and you agree to make payment using the payment method you provide when you sign up for a Subscription. We reserve the right to correct, or to instruct our payment processor or financing partner to correct, any errors or mistakes, even if payment has already been requested or received.

### **Subscription Holders**

Learners agree to pay monthly for their subscription, the amount will be deducted directly from the bank account or card details provided at the time of online registration. Please note that if you are outside the UK, transactions may be subject to foreign exchanges fees or difference in prices due to exchange fees. Depending on where you are, the type of payment method used, and where your payment method was issued, your transaction with us may be subject to foreign exchange fees or differences in prices because of exchange rates. Any agreement you have with your payment provider will govern your use of your specified payment method. Your failure to terminate and/or continued use of your Subscription reaffirms that we are authorised to charge you for that Subscription. This does not waive our right to seek payment directly from you.

### **Partners**

For all partners, an invoice will be issued by the Ultima Cleaning Academy Ltd together with a contract which is mutually agreed and signed by both parties. Please note the terms may differ for partners so please refer to the partner and their specific terms for these. If a learner is studying via a partner, they should in the first instance contact their company for specific terms.

## **Termination**

Should a learner fail to pay their agreed subscription payment, we will attempt to charge your card on two more occasions. If payment fails on third attempt, we will cancel your subscription and you will no longer have access to your online portal and our services. We can re-instate your access providing the remaining balance is paid upfront.

## **Deferrals**

Learners who wish to defer their commencement date of any of our programmes may do so providing they have paid their subscription annually. The deferrals will be reviewed on a case by case basis and will be at the discretion of Ultima Cleaning Academy Ltd.

## **Refusal**

Ultima Cleaning Academy Ltd reserves the right to deny applications and programme fees.

## **Variations**

We reserve the right to update these terms and conditions. Any such modifications will only apply upon notification of those changes to the learner via email communication.

## **Data Protection**

Ultima Cleaning Academy Ltd is committed to protecting your privacy. The information you provide upon registration and subscribing to our courses will be safeguarded by the Ultima Cleaning Academy Ltd, who may also use your data to keep you informed of relevant products and services. By using our services, you agree to the use of the data that we collect in accordance with our Privacy Policy (see below). If you object to being contacted, please contact [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com)

## **Cancelling your subscription**

A learner has the right to cancel their subscription at any time giving one month's notice. This can be done by sending an email expressing you wish to cancel to [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com). The fees for subscription will be cancelled for the following month.

Once the programme has been accessed by a learner, this indicates acceptance of service to these terms and conditions and no refunds will be issued.

## **Complaints**

If you have a complaint please email Ultima Cleaning Academy Ltd at [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com). We will assess your complaint and aim to respond within 7 days.

## **Contact**

Customers can contact [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com)

Ultima Cleaning Academy Ltd Unit 12, Parc Teifi Business Park, Cardigan. Ceredigion SA43 1EW

## **PRIVACY POLICY**

[www.ultimacleaningacademy.com](http://www.ultimacleaningacademy.com) (“the website”) is owned by Ultima Cleaning Academy Ltd

(“Ultima”; “we”; “us”; “our”), which is for the purposes of the United Kingdom Data Protection Act 1998 (“the Act”) the Data Controller and is situated at Unit 12, Parc Teifi Business Park, Cardigan. Ceredigion. SA43 1EW. The Act gives United Kingdom users the right to access information that is held about them. Ultima Academy website is an online resource for individuals, marketers, organisations and others, hereinafter referred to as the “Ultima Cleaning Academy Academy Services”. This policy applies to a “Visitor” (which means a person who browses the website but is not a member) or a “Learner” (which means a person who has been accepted by Ultima Cleaning Academy Ltd as a registered e-learning candidate to the website). The term “User” refers to a Visitor or a Member. We are committed to protecting any data that we collect concerning our website users. By using our services, you agree to the use of the data that we collect in accordance with this Privacy Policy. We are committed to protecting your privacy.

This Policy indicates the type of processes that may result in data being collected about you. Your use of this website gives us the right to collect that information.

### **Web server log information**

We use a third-party server to host our website. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system. Our server is located in the United Kingdom. Use of website server log information for IT security purposes:

Our third-party hosting provider stores server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity. Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our website server provider to make any attempt to identify you from the information collected via server logs. Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation). Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interests: we have a legitimate interest in using your information for the purposes of ensuring network and information security. IP address lookup

Our company uses third parties to provide information about visitors to our websites. When you visit our website, we will record your IP address. This address will be matched against public and proprietary IP address databases to provide us with information about your visit. This information may identify the organisation to whom the IP address is registered but not individuals. In some limited cases i.e. single person companies, it may be possible to identify personal data from publicly available ICANN data.

### **Website cookies and link tracking**

Cookies allow us to provide important site functionality, so you don't have to re-enter lots of information. They also allow us to remember what links and pages have been clicked or viewed during a session. If you have provided us with personal data, completing a contact form for example, we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you.

By using your browser controls, you are always in control of the cookies we store and access on your computer. More information on how to control cookies and limit personal data processing can be found at [www.youronlinechoices.com/uk/five-top-tips](http://www.youronlinechoices.com/uk/five-top-tips).

### **Types of communications**

By submitting your email address you are consenting to receive the specific piece of information you requested, as well as allowing us to send you appropriate and useful communications. This includes, but is not limited to; invitations to our industry leading events and webinars, our latest assets (whitepapers, guides, reports, infographics, videos and case studies) and promotional offers on courses and membership.

If you are a customer of Ultima Cleaning Academy Academy, you may also receive regular emails related to your course. These updates will also highlight the great new changes taking place at Ultima Cleaning Academy Academy. At any time, you can opt-out of any emails you receive from us.

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

- **Email** When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email). Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

- **Website forms.** When you contact us using any of our website forms, we collect the following information: your name, email address and any information you include in the message field and other fields. We also collect your company name if you provide it. If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

- **Transfer and storage of your information.** Messages you send us via our website forms will be stored on our web servers in the UK and transferred to our email provider's servers outside the European Economic Area. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

- **Phone.** When you contact us by phone, we collect your phone number and any information provided to us during your conversation with us. We do not record phone calls. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

- **Transfer and storage of your information.** Information about your call, such as your phone number and the date and time of your call, is processed by our third-party telephone service provider and stored in the United Kingdom.

- **Post.** If you contact us by post, we will collect any information you provide to us in any postal communications you send us. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

- **Transfer and storage of your information.** Information you send us by post is stored in the United Kingdom. Information we collect when you interact with our website: We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

- **Email marketing.** When you sign up to receive news and offers about our products and services on our website we collect your email address. Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

**Consent:** You give your consent to us sending you emails by signing up to receive it using the steps described above.

- **Transfer and storage of your information.** Information you submit to subscribe for our email communications will be stored outside the European Economic Area on servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

- **Registering on our website.** When you register and create an account on our website (at checkout), we collect the following information: your name, company name (if applicable), your address (including country, street address, town/city and postcode), phone number, email address and password (we do not view your password). If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest: registering and administering accounts on our website to provide you access to content and updates you have purchased and facilitate the efficient running and operation of our business.

- **Transfer and storage of your information.** Information you submit to subscribe for our email communications will be stored outside the European Economic Area on servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

## Information we collect when you place an order on our website

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information. When you place an order for goods or services on our website, we collect the following mandatory information: name, email address, phone number, billing address, company name (if applicable), VAT number (if applicable) and account password (if you create an account). If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us. Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation). Reason why necessary to perform a contract: other than phone number and password, we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations. Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). Legal obligation: other than phone number and password, we have a legal obligation to issue you with an invoice for the goods and services you purchased from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose.

Legal basis for processing: we collect your phone number and password in our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest(s):

- We collect your password for our legitimate interests in: (i) registering and administering accounts on our website to provide you access to content and updates you have purchased; and (ii) to facilitate the efficient running and operation of our business.
- We collect your phone number for our legitimate interest of more easily and effectively contacting you in relation to your order and your account.
- Marketing communications: At checkout you will have the option of receiving marketing communications from us.
- Offers relating to our goods and services

By submitting this form, you agree to us contacting you by email and storing your contact details for future contact about the Ultima Cleaning Academy Ltd's products and services. Your contact details will be accessible by employees of Ultima Cleaning Academy Ltd but will never be shared with or sold to third parties. Submitting your details also indicates that you have read and agree to our privacy policy and cookie policy. You can, of course, opt out of these communications at any time. We will send you marketing communications in relation to our goods and services only if you opt-in to receive them. Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

**Consent:** You give your consent to us sending you information about our goods and services by signing up to receive such information in accordance with the steps described above.

• **Transfer and storage of your information.** Information you submit to subscribe for our email communications will be stored outside the European Economic Area on Active Campaign's servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy

below entitled Transfers of your information outside the European Economic Area. Processing your payment After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use a third party payment processor called Stripe. Your payment will be processed by Stripe via a payment gateway. Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation). Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

- **Third party payment processors.** The third-party payment processors we use collect, use and process your information, including payment information, in accordance with their privacy policies.
- **Transfer and storage of your information.** The third-party payment processors may transfer information relating to your transaction and the processing of your transaction outside the European Economic Area. Where they do so, they will put appropriate safeguards in place. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

#### **How we collect or obtain information about you from third parties.**

This section sets out how we obtain or collect information about you from third parties. Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include other businesses and clients we work with from time to time who may recommend our services to you. These could be business in any industry, sector, sub-sector or location. It is also possible that third parties with whom we have had no prior contact may provide us with information about you. Information we obtain from third parties will generally be your name and contact details but will include any additional information about you which they provide to us. Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be). Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

**Consent:** Where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass your information on to us. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances. For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract. Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one). We may do this, for example, if we have insufficient information to be able to contact you or to better understand your business. Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Disclosure and additional uses of your information:** We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. These include the following: • Telephone providers (UK), • Email provider, • Mailing list provider, • IT service providers (UK), • Web developers (Belarus), and • Hosting provider (UK). Your information will be shared with these service providers only where necessary to enable us to run our business.

Disclosure of your information for legal reasons: Indicating possible criminal acts or threats to public security to a competent authority If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us or third parties. We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests:** Preventing crime or suspected criminal activity (such as fraud).

- In connection with the enforcement or potential enforcement our legal rights We will use your information in connection with the enforcement or potential enforcement of our legal rights, including sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law). Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

- In connection with a legal or potential legal dispute or proceedings We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest(s): resolving disputes and potential disputes.

- For ongoing compliance with laws, regulations and other legal requirements We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money



laundering matters. Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

**Legal obligation(s):** Legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed). Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations. Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below. Google: Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the partners page of Google's privacy policy.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** meeting our contractual obligations to Google under our Google Analytics Terms of Service and allowing the Google Analytics to work on our website You can opt out of Google Analytics by installing the browser plugin [here](#)

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, affiliates, business partners, independent contractors, and insurers Further information on each of these third parties is set out below. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest: running and managing our business efficiently.

**Accountants.** We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts. Our accountants are located in the United Kingdom.

**Advisors.** Occasionally, we obtain advice from advisors, such as accountants, financial advisors, lawyers and other specialists. We will share your information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice. Our advisors are located in the United Kingdom.

**Affiliates.** Affiliates are individuals or entities we work with to promote our business by various means, including by advertising our services on their websites, for example. Our affiliates can be in in

any industry, sector or subsector. Affiliates will share information with us and we will share information with them where you have expressed an interest in our products or services.

**Business partners.** Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with or own services.

**Independent contractors.** Occasionally, we use independent contractors in our business. Your information will be shared with independent contractors only where it is necessary for them to perform the function we have hired them perform in relation to our business.

**Insurers.** We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them. Our insurers are located in the United Kingdom.

**Cookies.** Your Internet browser has the in-built facility for storing small files – “Cookies” – that hold information which allows a website to recognise you as a user. Our website takes advantage of this facility to enhance your experience. We use a number of these cookies for analytical purposes, and these are described in detail below. By using the Ultima Cleaning Academy Academy website, you consent to the use of cookies for these purposes.

We use a combination of both session and persistent cookies. Session cookies keep track of your current visit and how you navigate the site, persistent cookies enable our website to recognise you as a repeat visitor when you return. The session cookies will be deleted from your computer when you close your browser. Persistent cookies will be removed on a pre-determined expiry date, or when deleted by you. Most web browsers allow user privacy settings to block either all cookies, or third-party cookies. Blocking cookies will, however, have a negative impact upon the usability of many websites, including this one. Please visit [www.aboutcookies.org](http://www.aboutcookies.org) for comprehensive information on how to change your cookie settings in a wide variety of different web browsers.

**Disclosing Information.** Except as otherwise described in this privacy statement, Ultima Cleaning Academy Ltd will not sell, rent, share, trade or give away or disclose any personal of your information to any third party unless we have your express permission or we believe that disclosure is necessary:

- (1) to comply with any laws, rules or regulations of duly constituted governmental authorities;
- (2) to respond to a subpoena, search warrant or other legal process received by Ultima Cleaning Academy Ltd, whether or not a response is required by applicable law;
- (3) to enforce Ultima Cleaning Academy Ltd.’s Terms of Use or to otherwise protect the legal rights of Ultima Cleaning Academy Ltd; or
- (4) to complete the transaction – e.g. when arranging for a courier company to deliver course materials that you have ordered ; or
- (5) to protect the security or safety of members of the public and Users. Ultima Cleaning Academy Ltd reserves the right to transfer personal information to:

- (i) a successor in interest that acquires rights to that information as a result of
  - (a) the sale of Ultima Cleaning Academy Ltd,
  - (b) a sale of substantially all of the assets of Ultima Cleaning Academy Ltd, or
- (ii) any member of Ultima Cleaning Academy Ltd.

We may also use the information to keep in contact with you and inform you of developments associated with our business and send you relevant retail banking industry communications. You will be given the opportunity to remove yourself from any mailing list or similar device. If at any time in the future we should wish to disclose information collected on this website to any third party, it would only be with your knowledge and consent. We may from time to time provide information of a general nature to third parties – for example, the number of individuals visiting our website or completing a registration form, but we will not use any information that could identify those individuals.

### **How long we retain your information**

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Ultima Cleaning Academy Ltd at Unit 12, Parc Teifi Business Park, Cardigan. Ceredigion. SA43 1EW; or sending an email to [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com)

Order information: when you place an order for goods and services, we retain that information for a minimum period of six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes under paragraph 6, Schedule 11 of the Value Added Tax Act 1994.

Correspondence and enquiries: when you make an enquiry or contact us by email or via our contact form, we will retain your information for as long as it takes to respond to and resolve your enquiry or for as long as you remain subscribed to our mailing list (i.e. you do not unsubscribe).

Mailing list: we retain the information you used to sign up for our email communications for as long as you remain subscribed (i.e. you do not unsubscribe).

Criteria for determining retention periods In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;

- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

**How we secure your information.** We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information; and
- using Secure Sockets Layer (SSL) software or other similar encryption technologies to encrypt any payment transactions you make on or via our website. Transmission of information to use by email Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in the unlikely event that we are required to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

- Email Information you submit to us by email is transferred outside the EEA and stored on our third-party email provider's servers. Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission. Safeguard(s) used: our third-party email provider has self-certified its compliance with the EU-U.S. Privacy Shield which is available [here](#). The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield [here](#)

- Contact form Information you submit via our contact form is stored on our server in the United Kingdom but is also forwarded to our email address and transferred outside the European Economic Area. For more information, please see 'Email' immediately above. Payment processing

When you pay for goods and services on our site, if you select Stripe or Stripe, information about your order and the processing of your order may be transferred outside the European Economic Area.

- Stripe Stripe may transfer information they process about your order outside the EEA. Where they do so, they will ensure appropriate safeguards are in place. You can access Stripe's privacy policy [here](#).

**Your rights in relation to your information:** Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Ultima Cleaning Academy Ltd, Unit 12, Parc Teifi Business Park, Cardigan. Ceredigion. SA43 1EW or sending an email to [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com)

- to request access to your information and information related to our use and processing of your information;
- to request the correction or deletion of your information;
- to request that we restrict our use of your information;
- to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third-party data controller);
- to object to the processing of your information for certain purposes (for further information, see the section below entitled Your right to object to the processing of your information); and
- to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available [here](#).

Further information about your rights The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website: • [Guide To The General Data Protection Regulation](#) • [Is My Information Being Handled Correctly](#) You can also find out further information about your rights, as well as information

on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here

**Verifying your identity where you request access to your information.** Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

**How we verify your identity.** Where we possess appropriate information about you on file, we will attempt to verify your identity using that information. If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information. We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request. Your right to object to the processing of your information: You have the following rights in relation to your information, which you may exercise by writing to Ultima Cleaning Academy Ltd, Unit 12, Parc Teifi Business Park, Cardigan. Ceredigion. SA43 1EW or sending an email to [hello@ultimacleaningacademy.co.uk](mailto:hello@ultimacleaningacademy.co.uk)

- to object to us using or processing your information where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
- to object to us using or processing your information for direct marketing purposes (including any profiling we engage in that is related to such direct marketing). You may also exercise your right to object to us using or processing your information for direct marketing purposes by: • clicking the unsubscribe link contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- sending an email [hello@ultimacleaningacademy.com](mailto:hello@ultimacleaningacademy.com), asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, 'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation. We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us. If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

### **Changes to this Policy**

Any changes to our Privacy Policy will be placed here and will supersede this version of our Policy. We will take reasonable steps to draw your attention to any changes in our Policy. However, to be

on the safe side, we suggest that you read this document each time you use the website to ensure that it still meets with your approval.

Contacting Ultima Cleaning Academy Ltd If you have any questions about the security of the website, please contact us at [hello@ultimacleaningacademy.co.uk](mailto:hello@ultimacleaningacademy.co.uk)