

Privacy Policy

This policy outlines how we handle the privacy of information supplied by you on our websites www.eaptitude.co.uk & www.stepsdigital.co.uk. The websites are owned by e Aptitude Limited, referred to as “e Aptitude” and registered in England and Wales under company number **11123721**. This Privacy Policy forms part of our terms and conditions and is designed to help you understand how we collect, use and safeguard information we receive from website visitors and customers.

Contact

You can contact us by post to **e Aptitude Limited, 74 College Road, Maidstone, Kent ME15 6SL**, or by email to info@eaptitude.co.uk. Henceforth in this policy these contact details shall be referred to as “e Aptitude”.

Data Protection

Under Data Protection legislation all individuals have the right to access their personal data and when processing data on your behalf we will comply with the provisions of the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2000. From 25 May 2018 we will also act in accordance with the General Data Protection Regulations (GDPR) and Data Protection Bill 2018. We keep all data in our secured systems. Personal Information will only be given to a third party where permission has been given or as required by the law as specified in the Regulations.

Legal Basis

By placing an order with us you are entering into a contract or taking steps to enter into a contract and therefore agreeing to the transfer of your details that will enable us to facilitate the completion of that contact.

On completion of that contract we may contact you from time-to-time for marketing purposes with regards to products you have a legitimate interest in purchasing.

Customer reviews will only be used on the website or in other media with the express permission of the customer.

Information we collect

We collect “non personal” and “personal information”. Non personal information includes information that cannot be used to personally identify you. Personal information includes the details you use when contacting us via the website such as your name and email address. This is required for initial communications. We will only send you emails about our products and services (i.e. direct marketing) with your express consent.

You have the option not to give consent and to withdraw consent at any time. You may withdraw your consent for us to contact you by contacting us at “e Aptitude”.

Use of personal data

Personal data submitted on this website will be used for the purposes specified in this Privacy Policy, to include the following:

- administer the website;
- improve your browsing experience by personalising the website;
- follow up with correspondence, email enquires;
- send you general (non-marketing) communications;
- send you email notifications which you have specifically requested;
- send to you marketing communications, where expressly agreed;
- provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- ask for feedback and review products and services;
- deal with enquiries and complaints made by or about you relating to the website.

Users of this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998.

Third Party Disclosures

We don't share, sell, or distribute your data to third parties, except as provided in this Privacy Notice. We may disclose information about you to any of our employees, officers, subcontractors or third-party providers only as is necessary for the purposes of completing tasks or providing services on our behalf. However, when we use third party service providers, we only disclose the information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use for their own direct marketing purposes.

We may disclose your personal information if we are required to do so by law, in connection with any legal proceedings, and in order to establish, exercise or defend any action taken against us.

When you are using our secure online payment pages, your payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

External links

Users of E Aptitude are advised to adopt a policy of caution before clicking on any external web links. [External links are clickable text / banner / image links to other websites.] Clicking an external link will take the user away from our website. Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's terms of use. E Aptitude cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk. E Aptitude and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Use of personal data

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

e Aptitude uses social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised that before using such social sharing buttons, that they do so at their own discretion, and should consider that the social media platform may track and save requests to share a web page, through the users' social media platform account.

Password Protection • Access your personal data

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please contact us at "E Aptitude".

Your Personal Information

Please contact us at "E Aptitude" if the personal information which we hold about you needs to be corrected or updated.

Please contact us at "E Aptitude" if you wish to instruct us not to process your personal data for marketing. To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. If you have any concern to the security of your data or wish to report a potential breach, please contact us at "E Aptitude".

If you believe that E Aptitude have misused or abused your personal data in accordance with your rights under the Data Protection Act 1998, General Data Protection Regulations, Data Protection Bill 2018 or Privacy Electronic Communication Regulations 2000 then you should contact the Information Commissioner's Office to register a complaint: Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Security

Any information you provide to us through our website is encrypted in transmission through the use of a SSL certificate. While visiting our website the address bar on your browser may show a padlock. This is a simple way to tell you that the communication between our servers and your browser is securely encrypted.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

You are responsible for keeping any passwords and customer login details confidential and not to disclose your password to any third party. You are responsible for any activity using your account and you should immediately notify us if you suspect, or know of, any unauthorised use of your account. We do not store customer passwords on our servers.

Changes to this Privacy Policy

E Aptitude reserves the right to change this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. You will be deemed to have accepted any changes to the terms of the Privacy Policy on your next visit of the **e Aptitude** website. You are advised to check for changes regularly. As of the 25th May 2018 this policy will be legislated by the General Data Protection Regulations and the Data Protection Bill 2018. This policy will be reviewed annually.

No Waiver

No failure or delay by either you or us in exercising any of the rights under this policy as part of our terms of use shall be deemed to be a waiver of that right, and no waiver of a breach of any provision shall be deemed to be a waiver of any subsequent breach of the same or any other provision.

Severance

If one or more of the provisions of this Privacy Policy is found to be unlawful, invalid or otherwise unenforceable, those provision(s) shall be deemed severed from the remainder of this Policy and shall remain enforceable.

Third Party Rights

The terms of this Privacy Policy shall not confer rights on any third parties and accordingly the Contracts (Rights of Third Parties) Act shall not apply.

Notices

Notices sent to you by e-mail will be deemed to have been received twenty-four hours after sending. The postal address for all notices and correspondence is **e Aptitude Limited, 15 College Road, Maidstone, Kent ME15 6SL**.

Jurisdiction and Governing Law

The terms of this Privacy Policy and all disputes, whether contractual or otherwise, arising out of or in connection with the policy are governed by and shall be construed in accordance with the laws of England and Wales and shall be submitted to the exclusive jurisdiction of the English courts.

Last updated: **16th May 2019**