

Privacy Policy

Strategic Proposals Ltd understands that your privacy is important and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, www.strategicproposals.com, and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Definitions and interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out in Part 11, below; and
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information about us

Our Site is owned and operated by Strategic Proposals Ltd, a Limited Company registered in England under company number 05859568.

Registered address:	207 Regent Street, London W1B 3HH
VAT number:	GB886806077
Data Protection Officer: Email Address:	Lorraine Baird lb@strategicproposals.com

3. What does this policy cover?

This Privacy Policy applies only to your use of our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. What is personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

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5. What are my rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that We hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed.

Further information about your rights can also be obtained from the Information Commissioner’s Office (ico.org.uk).

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concern ourselves, however, so please contact us first, using the details in Part 12.

6. What data do you collect and how?

Depending upon your use of our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 11 for more information about our use of Cookies and similar technologies Our Cookie Policy. We do not collect any ‘special category’ or ‘sensitive’ personal data or personal data relating to children and/or data relating to criminal convictions and/or offences.

Data collected	How we collect the data
Contact information including: Name, Email	Online website form.

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address, Telephone number.	<i>Note: Your contact details will be shared with APM Group and APMP for the purposes of managing your exam booking and results for APMP courses.</i>
Business information including Organisation, Job Title, Courses Attended, Referred by.	Alumni popup form. (Note this form shares data with our CRM provider, Zymplify.com)
Business information including, Name, Organisation, Address, Postcode, Country, Phone, Email, Comment, APMP Membership, If English is your first language	Booking form for courses <i>Note: Your name, organisation and dietary preferences will be shared with the relevant venue for classroom courses</i>
Payment information including card information.	Through our online payment provider Stripe. <i>Note we do not directly hold any payment information.</i>
Technical information including IP Address, Browser Type, Date/Time of website access and referrer information	As part of our website server logs or via Google analytics.

7. How do you use my personal data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site.	Email address	The lawful basis we rely on to process your personal data is that you have given your Consent.
Registering for the Alumni	Name, organisation, Job title, email address, phone, courses, referred by	The lawful basis we rely on to process your personal data is that you have given your Consent.
Purchasing a course	Name, Organisation, Address, Postcode, Phone, Email, Comment, APMP No., If English is your first language	The lawful basis we rely on to process your personal data is that you have given your consent and that it is needed in order to meet the contractual obligations of the data controller.
Emailing us	Any data you include within your email including your email address.	The lawful basis we rely on to process your personal data is that you have given your consent.
Communicating with you.	Your contact details	The lawful basis we rely on to process your personal data is that you have given your consent.

With your permission and/or where permitted by law, we may also use your personal data

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for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How long will you keep my personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long [We] OR [I] Keep It
Identity Information including: name, title	For a minimum of five years from our last contact or until you exercise your right to request that we delete your data.
Contact information including: Address, Organisation, Email, Telephone:	For a minimum of five years from our last contact or until you exercise your right to request that we delete your data.
Business information including: Business name, title, contact details, APMP No.	For a minimum of five years from our last contact or until you exercise your right to request that we delete your data.
Payment information including card data:	We do not store this information by provide direct access through our website where you can provide this information directly to our Payment Processing Partner, Stripe.
Technical information including: IP Address, browser type, operating system, data/time of access, referrer.	This information is not used to identify you but is held for technical and statistical reasons to enable us to provide an effective web presence.

9. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation. **Confirm this is the case.**

The security of your personal data is essential to Us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

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- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where We are legally required to do so.

10. How can I Access my personal Data?

If you want to know what personal data We have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email address shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

11. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on our Site are used in accordance with current Cookie Law.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
{random alphanumeric name}	Initialise the user session on the website and provide the content	Yes
{random alphanumeric name}	Initialise the user session on the website and provide the content	Yes
Cpnb_cookiesSettings	To enable and record your preferences with regard to cookies	Yes

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

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12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:
(for the attention of

NAME OF DATA CONTROLLER: Lorraine Baird

Email address: lb@strategicproposals.com or info@strategicproposals.com

13. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up to date.