

Privacy Policy

IFOL is committed to protecting your right to privacy as a user of our online documents and resources. It is our policy to respect the privacy of private communication.

The information you provide to us will be held for IFOL on servers based in either the UK, USA or Canada, depending on location in which the data is supplied and, except as explained below, we will not transfer it, or authorise its transfer, outside the country of origin.

We collect information about our users in order to help us continually services and facilities we offer. IFOL will always adhere to Data Protection Legislation, including but not limited to, the Data Protection Act 2018 and EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

This Privacy Policy only relates to the IFOL site and online academy and does not extend to your use of the Internet outside of the IFOL site and academy.

Information About Us

APARA Group Ltd (T/A IFOL) is a private limited company, registered in England under company number **11117365**. Our registered address and main trading address is Regency Court, High Street, Birmingham, B14 7SW

For data protection queries, please contact Dr Ben Adamson, email address: info@acarp-edu.org postal address: Regency Court, High Street, Birmingham, B14 7SW

What Data Do We Collect?

We aim to keep personal data collection and storage to a minimum. We collect and use the following personal (and non-personal) data:

Your registration and payment information;

Customer name;

Company name;

Email address;

Address;

Telephone number;

Number of employees (approximate bands);

Your subscription history (folder or package, start and end or renewal date);

Your IP address.

We do not monitor your use of the Internet, but we do use cookies and similar technologies, including web analytics, to monitor your use of IFOL. This information is not stored alongside your personal data and will only be used on an anonymous, aggregated basis. We may process your personal data in combination with the documents and forms downloaded in order to maintain and improve the facilities we offer and to send you alerts about important updates to such content (see below).

What Do We Use Your Data For?

We use your personal data for the following purposes:

Providing and managing your account and/or subscription(s).

Supplying you with information, documents, forms, and other content either through the IFOL site or by email. You can control your email preferences from 'My Account' and can opt out of our newsletters and bulletins when you register (or at any time thereafter). Please note that some emails are an integral part of the IFOL service you sign up for when registering with IFOL and cannot be opted out of and that by registering, you are consenting to us using your personal data to send such emails. We will never send you any spam and always aim to ensure that our emails will be genuinely useful to recipients.

Communicating with you. This may include responding to emails or calls from you.

Our processing of your personal data is in our legitimate interests and is necessary to provide the IFOL service to you and to continually improve it and the content available through it.

Our use of your personal data is limited to that which is reasonably required in order to provide our service to you and to make improvements to that service which benefit both us and you. We do not use your personal data for any reasons not stated in this Privacy Policy and never use it in an excessive manner that is disproportionate to our aims of providing and improving our service or in a way that is contrary to your interests.

In addition, when you purchase a subscription from us, your personal data is necessary for the formation (and subsequent performance) of the contract between you and APARA Group Ltd and the completion of your purchase.

What Cookies Do We Use?

IFOL uses the following cookies and related technologies for the following purposes:

Cookie (or similar)	Purpose
FirstName	This cookie is used to store and display your name on our site.
IFOL	This cookie is used to check the collection of cookies.
IFOLAdmin	These cookies are used by our “back office” admin system and are not related to your use of our site.
(“IFOLAdmin”)(“AdminEmail”)	
IFOLSuperAdmin	
(“IFOLAdmin”)(“SuperAdminEmail”)	
Google Tag Manager	This is a tool that we use for tracking and analytics on our site. We use tracking and analytics to better understand how you use our site in order to improve our service. Tracking and analytics are not used for any direct marketing purposes.
Bing Universal Event Tracking	This tool is used when you visit our site via one of our paid ads on the Bing search engine. We use tracking and analytics to better understand how you use our site in order to improve our service. Tracking and analytics are not used for any direct marketing purposes.

How Long Do We Keep Your Personal Data?

The personal data that you provide when registering with IFOL is retained until you ask us to delete it. If you wish to delete your account, you can do so using the 'Delete My Account' link in 'My Account'. Download histories are retained indefinitely, however when an account is deleted, this information cannot be used to identify you. Deleted accounts cannot be reactivated.

We also retain records of subscriptions and transactions for accounting purposes. Personal data contained within emails sent to us will be retained for as long as we reasonably require it. Questions relating to our content along with our answers to those questions may be retained unless you ask us not to in order to facilitate answering similar queries in the future, whether from you or from others. We also retain certain communications to aid in the conduct of potential future legal claims.

How and Where Do We Store or Transfer Your Personal Data?

We only store your personal data in the UK. This means that it will be fully protected under the GDPR.

As explained below, certain personal data will be made accessible to our third-party IT contractor, based outside of the European Economic Area. Additional steps have therefore been taken to ensure that your personal data will be treated just as securely and safely as it would be in the UK and under the GDPR, as embodied in a data processing agreement between us and our contractor based on model contractual clauses provided by the European Commission, which impose suitable data protection standards on a contractual basis.

Information and sharing disclosure

We may disclose to and/or share your information with affiliated and non-affiliated third parties in the following circumstances:

A) With Your Consent: If you consent to the disclosure we may do so.

B) Third-Party Partnerships: Occasionally, IFOL collaborates with other companies to jointly promote or offer products and services. If you purchase or show interest in a joint offering from IFOL, we may share your customer information with our promotional partners. Be aware that once your data is shared, the partner's use of it will be governed by their own privacy policies. If you prefer that your information not be shared in these cases, you can request removal by emailing privacy@ifol.com.

C) Event Attendees: We will not share attendee information with third parties unless: (i) you have opted in to sharing on an event registration form, or (ii) you attend an IFOL event and allow a business partner to scan your attendee badge. Once your information is shared, the partner's privacy policy will govern how they

handle your data. If you wish to opt out of such sharing, or remove your information from shared records, contact us at privacy@ifol.com.

D) Legal and Protective Disclosures: Your information may be disclosed to comply with legal requirements, protect the rights or property of IFOL, enforce agreements you've made with us, address claims regarding the infringement of third-party rights, fulfill customer service requests, or for other legitimate business interests, unless these interests are outweighed by your rights. We may also share information with law enforcement when necessary, especially in emergencies where such disclosures are consistent with legal obligations.

What Are Your Rights As A Data Subject?

Individual data subjects have the following rights under the GDPR which we will always work to uphold:

The right to be informed about our collection and use of your personal data (as described in this Privacy Policy).

The right to access your personal data by means of a subject access request (see below).

The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. You can do this either by contacting us or by clicking on the link in 'My Account'.

The right to erasure (also known as the right to be forgotten). You can exercise this right either by contacting us or by clicking on the 'Delete My Account' link in 'My Account'. Please note that if you delete your account, it will be deleted immediately and if you have an active subscription, that subscription will be cancelled. Refunds are not available. If you wish to ensure that we delete data such as accounting data or emails from you, please contact us.

The right to restrict or object to our processing of your personal data for particular purposes. Email preferences can be changed using the 'Email Preferences' link in 'My Account'. Using this link you can opt-out of our newsletters and bulletins and, for expired subscriptions only, our alerts. For active subscriptions, alerts are an integral part of our service. For further information, please contact us.

The right to data portability. This means that you can ask us for a copy of your personal data to re-use with another service or business. Please note, however, that this right applies only if you have provided personal data to us directly, we are using it with your consent or for performance with a contract, and your data is processed using automated means.

Rights relating to automated decision-making and profiling. We do not, however, use your personal data in this way (see above).

For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

Further information about your rights can be obtained from the Information Commissioner's Office. You also have the right to lodge a complaint with the Information Commissioner's Office if you feel that your rights have been breached.

How Can You Access Your Personal Data?

All personal data provided by you during registration, along with details of your subscription and download history, can be accessed via 'My Account'.

If you wish to make a data subject access request, please do so in writing, sent to the email or postal address shown below, clearly marking your correspondence as a subject access request.

We do not normally charge for subject access requests unless they are 'manifestly unfounded or excessive' (e.g. repetitive). We will respond to your subject access request within one month of receiving it. In the unlikely event that your request is particularly complex, a further two months may be required but we will keep you informed if this is the case.

How To Contact Us

To contact IFOL about anything to do with your personal data and data protection, including to make a subject access request, please use the following details and we will respond as soon as possible:

Email: info@acarp-edu.org

Telephone: +1 813-296-2787

Postal Address: Regency Court, High Street, Kings Heath. Birmingham, B14 7SW

Changes To This Privacy Policy

We may change our 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 notified to you the first time you login to IFOL after the changes have been made.