

## Privacy Policy

**Market Squared Limited** (**we, us, our**) are committed to protecting and respecting your privacy.

This privacy policy (**Privacy Policy**) (together with our **Terms of Access** and any other documents referred to) sets out the basis on which any personal data we collect from you (**Personal Data**), or that you provide to us via our online training portal, Volcube, will be processed by us.

**Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.**

For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is Market Squared Limited of Imperial House 21-25 North Street, Bromley, United Kingdom, BR1 1SD with registration number ZA136567.

### INFORMATION WE MAY COLLECT

We may collect and process the following information about you:

- information that you provide by filling in forms on Volcube. This includes information provided at the time of registering to use Volcube (whether you are signing up for our free trial (**Free Trial**) or you are subscribing to our services (**Subscription**), posting material, raising general enquiries or requesting further services;
- information in connection with the training, assessments and/or evaluations which you may undergo and/or participate in as part of the Volcube services;
- certain information when you report a problem with Volcube or regarding the services provided by us;
- details of any correspondence in the event that you contact us;
- survey information, which is used for research purposes, although you do not have to participate in them; and/or
- details of your visits to Volcube including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise and the resources that you access.

**Aggregate Data.** With regard to each of your visits to Volcube we may automatically collect the following information:

- technical information, including the internet protocol address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full uniform resource locators (URL) clickstream to, through and from Volcube (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We may collect this information for system administration, to report aggregated information to our advertisers and/or commercial partners or otherwise in accordance with this Privacy Policy. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

### WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our business partners or suppliers. Such staff maybe engaged in, among other things, administrative services and the provision of support services. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data are treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Where we have given you a username and password which enables you to access Volcube, you are responsible for keeping this password confidential.



You are not permitted to share your username or password with anyone or to use anyone else's username or password.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to Volcube; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## HOW WE USE YOUR INFORMATION

**Information you give to us.** We may use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information that you request from us;
- if you participate in our Free Trial, to send you details of how to register for a Subscription following expiry of that Free Trial;
- to provide you with information about other services we offer;
- to provide you, or permit carefully selected third parties to provide you, with information about publications, courses, training materials and/or other services we feel may interest you where you have consented to such contact;
- to notify you about changes to Volcube;
- to ensure that content from Volcube is presented in the most effective manner for you and for your computer; and/or
- for internal record keeping.

**Information we collect about you.** We may use this information:

- to administer Volcube and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep Volcube safe and secure;
- to make suggestions and recommendations to you and other users of Volcube about publications, courses, training materials and/or other services that may interest you or them; and/or
- to contact carefully selected financial organisations who may have relevant employment opportunities for you (as further detailed below).

## DISCLOSURE OF YOUR INFORMATION

**Employment Opportunities.** We may combine the information you give to us with information we collect about you in connection with your use of Volcube (and your performance in connection with the training, assessments and/or evaluations) and may share such information with carefully selected third parties who have employment opportunities (in the financial sector) which we (or they) feel may interest you.

We may also share your information with other selected third parties, including:

- our analytics and search engine providers that assist us in the improvement and optimisation of Volcube;
- our business partners or suppliers, for the performance of any contract we enter into with you and in order to provide you with the services that you may request from us; and/or
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users.

We may disclose your Personal Data to other third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if Market Squared Limited or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers may be one of the transferred assets;



- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our **Terms of Access** or other agreements; or
- otherwise in accordance with this Privacy Policy.

## **YOUR RIGHTS**

You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your Personal Data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting us at [support@marketsquared.co.uk](mailto:support@marketsquared.co.uk).

## **Third Party Links**

Volcube may, from time to time, contain links to other websites of interest. Please note, these websites have their own privacy policies and we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites. You should exercise caution and look at the privacy statement applicable to the website(s) in question.

## **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.

If you believe that any information we are holding about you is incorrect or incomplete, please contact us contacting us at [support@marketsquared.co.uk](mailto:support@marketsquared.co.uk).

## **CHANGES TO THIS POLICY**

We may revise this Privacy Policy from time to time. Any changes we may make to our Privacy Policy in the future will be posted on this page. You should check this page from time to time to ensure that you are happy with any changes.

## **CONTACT**

If you have any questions or comments in relation to your use of Volcube and/or the services available on it please contact us at [support@marketsquared.co.uk](mailto:support@marketsquared.co.uk).

Thank you for using Volcube.