

FIRST OPTION PRIVACY STATEMENT

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1. Privacy and Cookies Policy

Last updated: 24th January 2020.

This is the First Option Safety Group privacy and cookies policy for First Option websites and email use. Where you have signed a specific set of terms and conditions, they shall override any inconsistent terms stated below. We will provide notice where you may be redirected to a third party website and encourage you to carefully read their privacy policies.

Changes to this policy will continue to be posted here. Please check the website regularly for any changes to this Policy.

BY USING THIS WEBSITE OR EMAILING US, YOU AGREE TO THE TERMS OF THIS PRIVACY AND COOKIES POLICY.

2. Scope of this Policy

This privacy policy describes how First Option Safety Group will use the personal information collected when you visit First Option Safety Group websites and mobile applications or exchange emails with us that contain a link to this privacy policy (each, a "Service"). A Service may supplement

this privacy policy with additional privacy terms or with additional privacy notices in connection with certain features of that Service.

This privacy policy does not apply to websites, applications or mobile platforms that are not linked to this privacy policy or to those operated by third parties. We encourage you to review the privacy policies posted on those websites, applications and mobile platforms.

3. Collection of Information

3.1. Information provided by you

The types of information the Service collects directly from you may include the following as well as any other information type that we expressly ask you to enter and submit to the Service:

- Contact information, such as your name, email address, mailing address and telephone number;
- Usernames and passwords;
- Payment information, such as a credit or debit card number;
- Educational and employment background;
- Comments and feedback;
- Interests and communication preferences.

3.2. Information collected automatically

The Service automatically collects certain information regarding your use of the Service.

Examples of information collected automatically include:

- Internet Protocol ("IP") address used to connect your computer to the Internet;
- Computer, device and connection information, such as browser type and version, operating system, mobile platform and unique device identifier ("UDID") and other technical identifiers;
- Uniform Resource Locator ("URL") click stream data, including date and time, and content you viewed or searched for on a Service;
- Location information for location-aware Services to provide you with more relevant content for where you are in the world.

We may use and disclose automatically collected information for any purpose, except where we are restricted by applicable law. If we combine any automatically collected information with personal information, the combined information will be treated by us as personal information. We may also use aggregated information for any purpose, however, this information does not identify specific individuals and so is not personal information.

3.3. Cookies

This site uses cookies. By using this website you consent to our use of cookies. Note the use of Performance/ Analytics Cookies for the purposes described below. Cookies are small text files sent to your device when you visit a website which are then sent back to the website on each subsequent visit. Cookies act as a memory for a website, allowing that website to remember your device when returning. Cookies can also remember preferences and improve the user experience as well as tailor adverts to those most relevant to you.

You can find more information about cookies, such as how to see what cookies have been set on your device and how to manage them at <https://www.aboutcookies.org> We use session cookies (which exist only until you close your web browser) and persistent cookies (which exist for longer). Some cookies on our website are needed so you can move around the website and use it. These cookies don't gather information about you that could be used for marketing or remember where you have been on the internet.

Some cookies on our website collect information about how visitors use the website, e.g. which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies visitors. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our website works.

Our website uses Google Analytics cookies. Information collected by these cookies will be transferred to and stored by Google on servers in the USA in accordance with its privacy practices.

We may embed photos and videos from websites such as YouTube and Flickr. Or feeds from organisations like Facebook and Twitter.

When you visit a page containing these services, you may be presented with cookies from these websites. You may see embedded 'share' buttons on some of our pages. These allow you to share content through social networks. When you click these buttons, a cookie may be set by the service you have chosen to share content through. These third party cookies are not controlled by us. For further information about their use, please visit the relevant third party website for further information.

Be aware that: If you refuse or disable cookies, this website will not work. Note, disabling a cookie or category of cookie does not delete the cookie from your browser, you will need to do this yourself from within your browser.

If you are using a recent version of Chrome, you can see the specific cookies that are being used by this site, and in fact any site, by clicking on the secure padlock to the left of the web address in the browser window, or if the the site does not have a secure padlock the (i) information icon.

4. Use of your personal information

We use the personal information collected through the Service to complete various actions:

- to assist you in completing and to fulfill a transaction or order;
- to provide, modify and improve service and support;
- to update you on relevant new services and benefits;
- to personalise the Service and to select content to be communicated to you or to use features on the Service such as sharing content with a friend or colleague;
- to contact you regarding our products or services or other products and services from third parties;
- to invite you to participate in surveys, sweepstakes, competitions and similar promotions;
- for data analysis, audits, developing new products, enhancing the Service, identifying usage trends and determining the effectiveness of our promotional campaigns, or in other ways to which you have expressly agreed in a customer agreement with us;
- to prevent and detect security threats, fraud or other malicious activity;
- to comply with our legal obligations, resolve disputes, and enforce our agreements.

We may on occasion also match or combine the personal information that you provide with information that we obtain from other sources or that is already in our records, whether collected online or offline or by predecessor or affiliated group companies, for the purposes described above.

5. Sharing or disclosing your personal information

We share your personal information in the following ways:

- Affiliates. Your personal information may be accessible to all First Option affiliated companies worldwide for the purposes described in this policy.
- Agents, representatives, sponsors, societies and business partners. Your personal information may be accessible to our agents, representatives, sponsors and entities for which we are acting as an agent, licensee, joint venturer or publisher.
- Service providers. Your personal information may be accessible to our service providers and suppliers, which assist us with producing and delivering our products and services, operating our business, and marketing, promotion and communications. These providers and suppliers include, for example, editors, reviewers, credit or debit card processors, customer support, email service providers, IT service providers, financial services and shipping agents.
- Institutional subscribers. If the Service offers a content database or online learning service ("Subscription Service") and you access the Subscription Service through an institutionsponsored subscription, your personal information and certain usage data gathered through the Subscription Service, such as the number of items you downloaded, any nonsubscribed items you accessed, and test scores, may be shared with your institution for the purposes of usage analysis, subscription management, course management, and testing and remediation. If your institution is a corporation or other business entity, additional usage data, such as the types of records you viewed and the number of searches you ran, also may be shared for the purposes of cost attribution and departmental budgeting.
- Other third parties: We may share personal Information with other third parties if we expressly told you about such potential disclosure at the point at which you submitted the Information to us.
- Compliance with law and similar obligations. We may share personal information in order to: (i) respond to or comply with any law, regulation, subpoena or court order; (ii) investigate and help prevent security threats, fraud or other malicious activity; (iii) enforce and protect the rights and properties of First Option or its affiliates; or (iv) protect the rights or personal safety of our employees and third parties on or using our property.
- Change in corporate circumstances. If First Option Group, the Service or a related asset or line of business is acquired by, transferred to or merged with another company, your personal information may be disclosed to the prospective or actual purchasers.

The Service also may provide access to social media features, message boards, chat, forums, blogs, profile pages and other services to which you are able to post personal information and materials. Any information you post or disclose through these services is public. Please be careful when disclosing personal information in these public areas.

6. Children's privacy

We do not knowingly collect information from children under the age of 13 and First Option Group does not target its websites to children under 13.

7. Your choices and selecting your privacy preferences

You can manage available communications preferences by using the "opt-out" or unsubscribe mechanism or other means provided within the communications that you receive. We reserve the right to notify you of changes or updates to the Service whenever necessary.

8. Access to and accuracy of your personal information

You may request access to the personal information we hold about you. You may also request to review and correct any of that personal information. The Service may allow registered users to

directly access their registration information and make corrections or updates. The accuracy of such information is solely the responsibility of the user.

To protect your privacy and security, we will also take reasonable steps to verify your identity. To view and change the personal information that you directly provided to us, you can return to the Web page where you originally submitted your data and follow the instructions on that Web page, or contact us at the address listed below.

9. Data Security

We use a variety of data security measures intended to ensure the confidentiality, and integrity of your personal information.

10. Changes to privacy policy

If we modify this privacy policy, we will post the revised version here, with an updated revision date.

Rev 1 – July 10 2019

New Cookie policy - added Third Party Analytics section – deleted

11. Cross-border transfer of personal information

Your personal information may be transferred to other countries for processing, which may have different personal data protection rules than in your country. Where we transfer your data outside the EEA, we ensure adequate protection remains in place, including through the use of EU model clauses.

12. Contacting us

If you have comments or questions about this privacy policy or our processing of your information, please contact:

Sarah Fuller

Group HR & Operations Director
Orwell House
16-18 Berners Street
Fitzrovia, London
W1T 3LM

sarah.fuller@firstoption.group