

www.fullyspoken.com Privacy Policy

Type of website: Service-based business

Effective date: 25th day of January, 2025

www.fullyspoken.com (the "Site") is owned and operated by Fully Spoken. Fully Spoken is the data controller and can be contacted at:

info@fullyspoken.com

3rd Floor, 86-90 Paul St, London EC2A 4NE

Purpose

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site of the following:

1. The personal data we will collect;
2. Use of collected data;
3. Who has access to the data collected;
4. The rights of Site users; and
5. The Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

GDPR

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

Consent

By using our Site users agree that they consent to:

1. The conditions set out in this Privacy Policy.

When the legal basis for us processing your personal data is that you have provided your consent to that processing, you may withdraw your consent at any time. If you withdraw your consent, it will not make processing which we completed before you withdrew your consent unlawful.

You can withdraw your consent by: Users can withdraw their consent for data processing at any time by following these steps:

Clicking the “Unsubscribe” link in any email communication.

Accessing the “Account Settings” section on our website to manage data preferences.

Contacting us directly at privacy@fullyspoken.com or using the data request form available on our Privacy Policy page.

Updating cookie preferences through the “Cookie Settings” link available at the bottom of every page.

Legal Basis for Processing

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR.

We rely on the following legal bases to collect and process the personal data of users in the EU:

1. Users have provided their consent to the processing of their data for one or more specific purposes;
2. Processing of user personal data is necessary for us or a third party to pursue a legitimate interest. Our legitimate interest is not overridden by the interests or fundamental rights and freedoms of users. Our legitimate interest(s) are: "We process certain personal data based on our legitimate interests, which include:

*"Delivering and improving our services to meet client and learner needs.

Maintaining the security and functionality of our website and platform.

Communicating with our clients, tutors, and learners to manage relationships and provide updates.

Promoting Fully Spoken’s services responsibly to grow our business.

Complying with legal and regulatory obligations, such as record-keeping for accounting purposes."*

"We ensure that our legitimate interests do not override your rights and freedoms by using secure systems, limiting data collection to what is necessary, and providing you with options to manage your data preferences.";

3. Processing of user personal data is necessary for us to take, at the request of a user, steps before entering a contract or for the performance of a contract to which a user is a party. If a user does not provide the the personal data necessary to perform a contract the consequences are as follows: "To provide our services, certain personal data is required to fulfil our contractual obligations with you or the organisation you represent. This includes, but is not limited to, information needed to:

Set up and manage your account.

Schedule and facilitate tutoring sessions.

Process payments or issue invoices.

Communicate updates or changes related to your services.

If you choose not to provide the required personal data, we may not be able to:

Deliver the services you have requested.

Fulfil our obligations under the agreed contract.

Respond to specific requests related to your service.

In such cases, Fully Spoken reserves the right to decline the provision of services or terminate the contract due to the inability to process necessary data."; and

4. Processing of user personal data is necessary for us to comply with a legal obligation. If a user does not provide the the personal data necessary for us to perform a legal obligation the consequences are as follows: "Certain personal data must be provided to Fully Spoken to comply with legal and regulatory requirements. This includes, but is not limited to:

Processing and retaining financial transaction records for tax and accounting purposes.

Complying with laws related to anti-fraud, anti-money laundering, and other regulatory obligations.

Responding to legal requests or court orders.

If you choose not to provide the required personal data, we may:

Be unable to provide you with our services due to non-compliance with legal obligations.

Be required to terminate any existing agreements or accounts associated with you.

Retain the right to refuse future service until the necessary data is provided.".

Personal Data We Collect

We only collect data that helps us achieve the purpose set out in this Privacy Policy. We will not collect any additional data beyond the data listed below without notifying you first.

Data Collected Automatically

When you visit and use our Site, we may automatically collect and store the following information:

1. IP address;
2. Location;

3. Hardware and software details;
4. Clicked links;
5. Content viewed;
6. Maintain user sessions (e.g., keeping users logged in).; and
7. Personalise content and marketing efforts..

Data Collected in a Non-Automatic Way

We may also collect the following data when you perform certain functions on our Site:

1. First and last name;
2. Email address;
3. Phone number;
4. Address;
5. Payment information; and
6. For B2B clients: Organisation name, role/title, and purpose of service use..

This data may be collected using the following methods:

1. Account Registration: Users manually provide their name, email address, and other required details.;
2. Transaction Processing Payment information is collected during the purchase of services through secure, third-party payment gateways.;
3. Surveys and Feedback Forms Users voluntarily provide data through feedback forms or surveys to help improve services.;
4. Account Updates Users can update personal information through account settings.;
5. Contact Forms: Users submit their name, email, and message for inquiries or support.;
- and
6. Service Bookings: Users enter data when booking a session or service..

How We Use Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

The data we collect automatically is used for the following purposes:

1. **Website Functionality and Performance** To ensure the website operates smoothly and is compatible with various devices and browsers. Example: Fixing bugs or optimising the website based on user use.;
2. **Security and Fraud Prevention** To detect, prevent, and address fraudulent activities or security breaches. Example: Blocking suspicious IP addresses from accessing the site;
3. **Analytics and Business Insights** To understand user behavior and improve services or content. Example: Analysing which pages are most visited to guide future updates or marketing efforts.;
4. **Personalisation** To tailor the user experience based on browsing history or preferences. Example: Showing relevant resources or services based on prior visits.; and
5. **Marketing and Advertising** To create targeted marketing campaigns or retarget users based on their interaction with the website..

The data we collect when the user performs certain functions may be used for the following purposes:

1. To deliver the services you request and manage your account.;
2. To process payments securely and issue invoices or receipts.;
3. To communicate with you regarding updates, inquiries, or changes to your services.;
4. To improve our website, services, and user experience based on feedback and analytics.; and
5. To comply with legal and regulatory obligations, such as tax and accounting requirements..

Who We Share Personal Data With

Employees

We may disclose user data to any member of our organisation who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

Third Parties

We may share user data with the following third parties:

1. **Payment Processing:** Payment gateways;

2. Analytics and Website Performance: Analytics providers;
3. Sales and Marketing Services: Paid Advertisements, Email marketing platforms, Social Media Marketing,;
4. Tutor Management: Tutors as independent contractors.; and
5. Legal or Regulatory Authorities: Government agencies, solicitors, or courts..

We may share the following user data with third parties:

1. Payment processors to handle secure transactions.;
2. Analytics providers to improve website performance and user experience.;
3. Tutors to deliver personalised sessions tailored to your preferences.;
4. Marketing platforms to deliver targeted advertisements or promotional materials.; and
5. Legal or regulatory authorities to comply with applicable laws.*.

We may share user data with third parties for the following purposes:

1. To process payments securely through payment gateways.;
2. To analyse website performance and improve user experience using analytics tools.;
3. To deliver requested services, including matching learners with tutors.;
4. To run targeted marketing campaigns and retarget users who have shown interest in our services.;
5. To provide efficient customer support and resolve inquiries.;
6. To comply with legal obligations, such as tax reporting or responding to regulatory requests.;
7. To enhance system security and prevent fraud.;
8. To aggregate data for research and business insights without identifying individual users.*; and
9. We ensure that data shared with third parties is limited to what is necessary for these purposes and is processed securely and in compliance with applicable laws..

Third parties will not be able to access user data beyond what is reasonably necessary to achieve the given purpose.

Other Disclosures

We will not sell or share your data with other third parties, except in the following cases:

1. If the law requires it;
2. If it is required for any legal proceeding;
3. To prove or protect our legal rights; and
4. To buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to another Site, please note that we are not responsible for and have no control over their privacy policies and practices.

How Long We Store Personal Data

User data will be stored for Payment Records: 6 years. Marketing Data: Until you opt out. Inactive Accounts: 2 years. Service Data: Until no longer needed. Contact privacy@fullyspoken.com to request deletion.

You will be notified if your data is kept for longer than this period.

How We Protect Your Personal Data

"We take the protection of your data seriously and implement the following measures:

Encryption: All data transmitted through our website is protected using strong browser encryption protocols (e.g., HTTPS).

Secure Servers: User data is stored on secure servers in facilities with robust access controls.

Access Controls: Data is accessible only to authorised employees and contractors, who require it to provide our services.

Confidentiality: All employees and contractors are bound by strict confidentiality agreements, and any breach results in immediate termination and potential legal action.

Regular Audits: We perform regular security audits to identify and address vulnerabilities. These measures ensure your data is handled safely and complies with GDPR requirements."

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times and therefore we are unable to guarantee the security of user data beyond what is reasonably practical.

International Data Transfers

We transfer user personal data to the following countries:

1. _____.

When we transfer user personal data we will protect that data as described in this Privacy Policy and comply with applicable legal requirements for transferring personal data internationally.

If you are located in the United Kingdom or the European Union, we will only transfer your personal data if:

1. The country your personal data is being transferred to has been deemed to have adequate data protection by the European Commission or, if you are in the United Kingdom, by the United Kingdom adequacy regulations; or
2. We have implemented appropriate safeguards in respect of the transfer. For example, the recipient is a party to binding corporate rules, or we have entered into standard EU or United Kingdom data protection contractual clauses with the recipient..

Your Rights as a User

Under the GDPR, you have the following rights:

1. Right to be informed;
2. Right of access;
3. Right to rectification;
4. Right to erasure;
5. Right to restrict processing;
6. Right to data portability; and
7. Right to object.

Children

The minimum age to use our website is 16 years of age. We do not knowingly collect or use personal data from children under 16 years of age. If we learn that we have collected personal data from a child under 16 years of age, the personal data will be deleted as soon as possible. If a child under 16 years of age has provided us with personal data their parent or guardian may contact our data protection officer.

How to Access, Modify, Delete, or Challenge the Data Collected

If you would like to know if we have collected your personal data, how we have used your personal data, if we have disclosed your personal data and to who we disclosed your personal data, if you would like your data to be deleted or modified in any way, or if you

would like to exercise any of your other rights under the GDPR, please contact our data protection officer here:

privacy@fullyspoken.com

3rd Floor, 86-90 Paul St, London EC2A 4NE

How to Opt-Out of Data Collection, Use or Disclosure

In addition to the method(s) described in the *How to Access, Modify, Delete, or Challenge the Data Collected* section, we provide the following specific opt-out methods for the forms of collection, use, or disclosure of your personal data specified below:

1. "Users can opt-out of certain types of data collection, use, or disclosure by following these methods:

Direct Marketing: Click "Unsubscribe" in our emails or contact us at privacy@fullyspoken.com.

Cookies and Tracking: Adjust your preferences through the 'Cookie Settings' link on our website or disable cookies in your browser settings.

Third-Party Analytics and Ads: Use tools such as Google Analytics Opt-Out or modify ad preferences on social platforms.

Personalised Recommendations: Disable tracking via the 'Cookie Settings' link or contact us to opt-out of profiling."* You can opt-out by *"Users can opt out of specific types of data collection, use, or disclosure as follows:

Marketing Communications: Click the "Unsubscribe" link in our emails or contact us at privacy@fullyspoken.com.

Cookies and Tracking: Manage your preferences via the "Cookie Settings" link on our website or disable cookies in your browser.

Targeted Advertising: Use tools such as Google Analytics Opt-Out or modify your social media ad preferences.

Personalised Recommendations: Disable tracking via cookie settings or contact us to opt-out of profiling activities.

Data Sharing with Third Parties: Contact us to request limited or no sharing of your data for third-party advertising."*

Cookie Policy

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to be notified each time a cookie

is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We use the following types of cookies on our Site:

1. Functional cookies

Functional cookies are used to remember the selections you make on our Site so that your selections are saved for your next visits;

2. Analytical cookies

Analytical cookies allow us to improve the design and functionality of our Site by collecting data on how you access our Site, for example data on the content you access, how long you stay on our Site, etc;

3. Targeting cookies

Targeting cookies collect data on how you use the Site and your preferences. This allows us to personalise the information you see on our Site for you;

4. session cookies

Session cookies to manage user logins or interactions temporarily during a session.; and

5. Third-Party Cookies

Third-party cookies are created by a website other than ours. We may use third-party cookies to achieve the following purposes:

- a. Analytics Tools to monitor site traffic, SEO, user behaviour, and overall performance. Data collected: IP address, browser type, pages visited.;
- b. Advertising: Social Media Insight for targeted and retargeted advertising campaigns. Data collected: Browsing activity, interactions with ads, and general location.;
- c. Payment Processing Payment gateways like Payment providers may use cookies to secure and track transactions.; and
- d. Social Media Integration Cookies from embedded social media widgets (e.g., “Share” or “Like” buttons) may track user activity across platforms..

Additional Clauses

"Fully Spoken is not liable for any direct, indirect, incidental, or consequential damages arising from the use of our services, including errors in tutoring or platform functionality.

Our liability is limited to the fees paid for the specific services rendered."

"All content on this website, including logos, text, graphics, and learning materials, is the property of Fully Spoken or our licensors and is protected under copyright laws. Users may not reproduce, distribute, or exploit our materials without prior written consent."

"We reserve the right to update these Terms and Conditions at any time. Users will be notified of significant changes via email or website updates. Continued use of the platform after such updates constitutes acceptance of the revised terms."

"In the event of a dispute, we encourage users to contact us first to seek resolution. If a resolution cannot be reached, disputes will be settled under the jurisdiction of the UK courts."

"Fully Spoken is not responsible for delays or failures in performance due to events beyond our reasonable control, including natural disasters, internet outages, or government restrictions."

Modifications

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

Complaints

If you have any complaints about how we process your personal data, please contact us through the contact methods listed in the *Contact Information* section so that we can, where possible, resolve the issue. If you feel we have not addressed your concern in a satisfactory manner you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the Information Commissioner's Office in the UK, Website: <https://ico.org.uk/> Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Phone: 0303 123 111.

Contact Information

If you have any questions, concerns or complaints, you can contact our data protection officer, Emma, at: **Fully Spoken**

privacy@fullyspoken.com

3rd Floor, 86-90 Paul St, London EC2A 4NE