

## **CORTTEX eLearning Policy**

### **Personal data**

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### **How do we gather information?**

When you sign up for free membership of our learning platform, you will be asked to provide details necessary for us to set up your user account via an online form. If you become a student and participate in a course, further data will be held related to the courses you are enrolled in.

### **What type of information do we gather?**

This may include your name, email address, organization (if applicable), phone number. Course participation data will include details of activities completed within courses. Logs contain information about user activity within courses, including date/time when course information was viewed and information about the referring webpage.

### **What will we do with the information you provide?**

The information you provide via the online registration form is sent securely to us, and is used to create your account, and send you the details you require to login and access the learning platform. Course participation data is used to grade your assignments and track your progress to completing the qualification. We may use anonymous course statistical information in order to improve our courses (for example, number of students, activities completed).

### **Lawful basis for processing**

If you are becoming a member of the site purely to access the free learning resources, we process your data under Consent. By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Where consent is required to process both standard and sensitive types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used. Agreement with this Privacy Notice will be considered to be explicit consent and we will keep a copy of the records of that consent for audit purposes.

### **Sharing your data – who has access?**

Our administrators have access to your data for the purposes of creating your account, providing any administrative or technical support that you request and support you in gaining your qualification. System data related to courses and your account is hosted within the EU and will not be transferred outside the EU.

The personal data of users of our website services are not transmitted to third parties for marketing purposes.

If you request any reasonable adjustments, or we hold an investigation, complaint or appeal, we may be required to share sensitive personal data with us. We will gain your explicit consent before doing this.

### **How long will we hold your data?**

As long as you are an active member of the site, we will retain your data. If you become inactive, we will deactivate your account and data after a period of 12 months of inactivity. We regularly review our newsletter mailing list, from time to time we will send resubscription emails asking if you would like to continue receiving it. If you do not respond, we will remove you from our mailing list. Information about contributions to courses and evidence of participation in activities, may be anonymized and held by the system.

### **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

1. Right of access – If you would like to access your personal data, contact us at [info@cortex.eu](mailto:info@cortex.eu) or log in to your account.
2. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete. If you believe the data, we hold is inaccurate, or you would like to update it, please contact us at [info@cortex.eu](mailto:info@cortex.eu).
3. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If you no longer wish to have membership of the CORTTEX learning platform, please contact us at [info@cortex.eu](mailto:info@cortex.eu).
4. Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
5. Right of portability – you have the right to have the data we hold about you transferred to another organization.
6. Right to object – you have the right to object to certain types of processing such as direct marketing.
7. Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
8. Right to judicial review: in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

### **Information and outside parties**

We will keep your personal information confidential except where you have posted it for publication or display and/or to the extent that we are compelled to disclose it by law (for example where fraud or other crime is involved) or to comply with an instruction of a regulatory body of competent jurisdiction. From time to time we may be called upon to demonstrate our maintenance of certain standards as set by appropriate authorities and/or to satisfy our auditors and/or to comply with any requirements of relevant regulatory organization in order to comply with regulations in relation to statutory requirements and to comply with guidelines for best practice and user safety. This includes demonstrating ethical, legal and safe practice through the process of psychological and coaching supervision. We do not and will not share personally identifiable information with any other parties.

### **Cookies**

Cookies are small files which sit on your computer and record specific interactions between you and this website, and in some cases, other websites. Below is more detail about the cookies we use, what they record and who the information is shared with. You can choose to disable

cookies; however, this can affect the functionality of the website.

- MoodleSession: This cookie provides continuity and maintains your login from page to page. When you log out or close the browser this cookie is destroyed (in your browser and on the server)
- MOODLEID\_ : This cookie records the username you log in as when you visit the site, and allows the username field to be automatically filled in the next time you visit.

### **Data Security**

In order to protect the Personal Data of the users and visitors of our website we use secure connection (https: //) and data security measures to prevent the risk of loss, misuse, unauthorized access and disclosure of your personal information such as use of encryption when transferring certain sensitive data.

### **Links to sites that do not belong to us**

Our site may contain links to other sites. We are not responsible for the Personal Data protection policies of these sites nor for their content.

### **Minors**

The content of our website and the services provided are aimed exclusively at people over 18 years of age and we do not knowingly collect any information about people below this age. If you are under 18 you are not allowed to submit your information to us in any way.

As it is not technically feasible to effectively control your age at all times, we undertake to erase all relevant information immediately if it is reported and verified that the action of submitting personal information about minors has taken place. This deletion is without prejudice to the need to keep records in the event that our legal claims are substantiated, exercised or upheld, or upon being provided guardian's consent.

### **Amendments to this privacy policy**

We have the right to amend the above from time to time. Changes will be notified to you via the email address provided on registration, in advance of the changes taking effect, and via an announcement on the Website. Any update will take effect once published on the Website.

### **Complaints**

If you have a complaint regarding any breach of this privacy policy, contact us at [info@cortex.eu](mailto:info@cortex.eu). When we receive the complaint, we will review it and ensure that we are in compliance with our privacy policy and all applicable laws. We will contact you within 40 days of receiving your complaint to inform you of the results of your complaint.