Cookie Policy of Bayswater Education Limited

This document informs Users about the technologies that help Bayswater Education Limited to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with Bayswater Education Limited.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate.

For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Bayswater Education Limited uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them. The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information – such as the presence of other Trackers - in the linked privacy policies of the respective third-party providers or by contacting the Owner.

Activities strictly necessary for the operation of Bayswater Education Limited and delivery of the Service

Bayswater Education Limited uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

Third-party Trackers

SPAM protection

This type of service analyzes the traffic of Bayswater Education Limited, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

- GRECAPTCHA: duration of the session
- rc::a: indefinite
- rc::b: duration of the sessionrc::c: duration of the session

Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

Instapage (Instapage, Inc.)

Instapage is a landing page management service provided by Instapage, Inc., that allows Bayswater

Education Limited to collect the email addresses of Users interested in its service.

Instapage allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data processed: Cookies, email address and Usage Data.

Place of processing: United States - Privacy Policy.

Other activities involving the use of Trackers

Experience enhancement

Bayswater Education Limited uses Trackers to provide a personalized user experience by improving the quality of preference management options, and by enabling interaction with external networks and platforms.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of Bayswater Education Limited.

The interaction and information obtained through Bayswater Education Limited are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on Bayswater Education Limited isn't being connected back to the User's profile.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• fbp: 3 months

Twitter Tweet button and social widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

personalization id: 2 years

Measurement

Bayswater Education Limited uses Trackers to measure traffic and analyze User behavior with the goal of improving the Service.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of Bayswater Education Limited, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

Storage duration:

• AMP TOKEN: 1 hour

_ga: 2 years_gac*: 3 months_gat: 1 minute_gid: 1 day

Anonymized analytics services

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymized form.

Google Analytics with anonymized IP (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of Bayswater Education Limited, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

Storage duration:

• AMP TOKEN: 1 hour

_ga: 2 years_gac*: 3 months_gat: 1 minute_gid: 1 day

Heat mapping and session recording

Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out-information here.

Personal Data processed: Cookies, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: Malta - <u>Privacy Policy</u> - <u>Opt Out</u>.

Storage duration:

- hjAbsoluteSessionInProgress: 30 minutes
- hjCachedUserAttributes: duration of the session
- hjClosedSurveyInvites: 1 year
- _hjDonePolls: 1 year
- hjFirstSeen: duration of the session
- hjIncludedInPageviewSample: 30 minutes
- hjIncludedInSessionSample: 30 minutes
- hjLocalStorageTest: duration of the session

- hjLocalStorageTest: duration of the session
- _hjMinimizedPolls: 1 year
- _hjRecordingEnabled: duration of the session
- _hjRecordingLastActivity: duration of the session
- _hjSession*: 30 minutes
- hjSessionRejected: duration of the session
- hjSessionResumed: duration of the session
- hjSessionTooLarge: duration of the session
- hjSessionUser*: 1 year
- _hjShownFeedbackMessage: 1 year
- hjTLDTest: duration of the session
- _hjUserAttributesHash: duration of the session
- hjViewportId: duration of the session
- hjid: 1 year

Targeting & Advertising

Bayswater Education Limited uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Bayswater Education Limited, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Bayswater Education Limited. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC. This service uses the "DoubleClick" Cookie, which tracks use of Bayswater Education Limited and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of data, consult Google's partner policy.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 daysFCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 monthsFPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- _gads: 2 years
- _gsas: 2 years
- gac: 3 months
- _gac_gb_: 3 months
- gcl au: 3 months

_gcl_aw: 3 months_gcl_dc: 3 months_gcl_gb: 3 months_gcl_gf: 3 months_gcl_ha: 3 months

• id: 2 years

• test cookie: 15 minutes

How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences and withdraw their consent via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

Locating Tracker Settings

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU), the <u>Network Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

Consequences of denying consent

Users are free to decide whether or not to grant consent. However, please note that Trackers help Bayswater Education Limited to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, in the absence of the User's consent, the Owner may be unable to provide related features.

Owner and Data Controller

Bayswater Education Limited, 167 Queensway, London, W2 4SB, UK

Owner contact email: privacy@bayswater.ac

Since the use of third-party Trackers through Bayswater Education Limited cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by Bayswater Education Limited.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Bayswater Education Limited (or third-party services employed in Bayswater Education Limited), which can include: the IP addresses or domain names of the computers utilized by the Users who use Bayswater Education Limited, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Bayswater Education Limited who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Bayswater Education Limited. The Data Controller, unless otherwise specified, is the Owner of Bayswater Education Limited.

Bayswater Education Limited (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Bayswater Education Limited as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to Bayswater Education Limited, if not stated otherwise within this document.

Latest update: October 24, 2022