



Please note that this privacy and cookie policy refers only to the ScholarPack website.

Last updated 18th May 2023

Introduction and General Terms

the ScholarPack website. This Privacy and
e following online services:

It also relates to our use of any personal information you provide to us by phone, SMS, email, in letters, other correspondence and in person. In order to provide you with the full range of ScholarPack services, we sometimes need to collect information about you.

This Privacy and Cookies Policy explains the following:

- What information ScholarPack may collect about you;
- How ScholarPack will use information we collect about you;
- When ScholarPack may use your details to contact you;
- Whether ScholarPack will disclose your details to anyone else;
- Your choices regarding the personal information you provide to us;
- The use of cookies on the ScholarPack website and how you can reject cookies.

ScholarPack is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act 2018 and the General Data Protection Regulations which came into effect on 25th May 2018. These laws are referred to collectively in this policy as the “data protection laws”.

The ScholarPack website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

We may need to update the website and this policy at any time and without notice. Where you have given us your email address, we may use this to notify you of such changes. Please check this policy regularly to ensure you always understand how we use your information.

1. Who are we?

We are Histon House Limited (trading as ScholarPack), a company incorporated under the laws of England and Wales with company number 07319617 whose registered office is 1st Floor Linen Court, 10 East Road, London, N1 6AD. If you have any queries about how we use your data, please contact our data protection officer at dpo@scholarpack.com.

2. What information will ScholarPack collect about me?

We'll only collect your information in line with the relevant regulations and law. We may collect it from a range of sources and it may relate to any of our products or services you currently use or have used in the past.

We may collect data about you through:

- Signing up to receive newsletters

- Submitting an enquiry through a form
- Entering competitions
- Live chats, web and mobile notifications

We may also collect information about you when you interact with us, e.g. visit our websites or mobile channels, call us or ask about any of our products. Some of this information will come directly from you. We might also get some of it from publicly available sources.

The types of information we collect about you may include:

- Your name and job title

ScholarPack collects information about how you use the ScholarPack website and the device(s) you use to access the website. This includes:

- Collecting unique online identifiers such as IP addresses (which are numbers that can uniquely identify a specific computer or other network device on the internet)
- Your use of the ScholarPack website, such as what you read, what pages and content you visited or documents you download.
- For more information on how we may collect and use this data please see section 13 of this policy, on ScholarPack's use of cookies and our use of third party analysis applications.

3. How will ScholarPack use the information it collects about me?

We'll only use information on you where we have consent or we have another lawful reason for using it. These reasons include where we:

- Need to pursue our legitimate interests
- Need to process the information to carry out an agreement we have with you

The reasons we use your information include:

- To provide you with the most user-friendly online navigation experience
- Where we provide personalised services, we may analyse the information you supply, as well as your activity on our website so that we can offer a more relevant, tailored experience.
- Managing our relationship with you, including (unless you tell us otherwise) telling you about products we think may be relevant for you
- Understanding how you use our website content
- Undertaking website content improvement
- Undertaking risk management
- Protecting our legal rights and complying with our legal obligations
- To use IP addresses and device identifiers to identify the location of users, to block disruptive use, to establish the number of visits from different regions or countries.
- We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes

We may use information which we hold about you to show you relevant advertising on third party sites (e.g. Facebook, Google, Instagram, Snapchat and Twitter). This could involve showing you an advertising message where we know you have used the ScholarPack products or website. If you don't want to be shown targeted advertising messages from ScholarPack, some third

party sites allow you to request not to see messages from specific advertisers on that site in future, or contact us to request removal at support@scholarpack.com or call 01522 716 049.

4. How we make decisions about you?

Identify the relevancy of products to new or existing customers. Individuals may have a right to request human intervention

5. When will ScholarPack contact me?

ScholarPack may contact you:

- In relation to any correspondence we receive from you or any comment or complaint you make about ScholarPack products
- To invite you to participate in surveys or research about ScholarPack's current or potential products (participation is always voluntary)

We may use your information to identify products of interest to you. We may use your information to identify products and services from our partners and other relevant third parties. We may send marketing messages by post, email, telephone, text or other ScholarPack platforms. You may opt out of receiving marketing by amending your preferences. You can do this by calling the team on 01522 716 049, emailing us at support@scholarpack.com, or by clicking the link on any marketing emails we may send you.

7. Will ScholarPack share my personal information with anyone else?

We may share your information with other companies in our group, for example The Key, for the purpose of our legitimate business interest or another lawful basis. We will always ensure that your data is managed in accordance with this policy.

We may share your information with others where lawful to do so including where we or they:

- Have a public or legal duty to do so.
- Need to in connection with regulatory reporting, litigation or asserting or defending legal rights and interests.
- Have a legitimate business reason for doing so.
- To provide you with products you've requested.
- Have asked you or the individuals connected to your business for your permission to share it, and you (or they) have agreed.

In addition, we hope we will continue to expand. So, eventually, we may have additional group companies (we will all be owned by the same company, though). If this happens, we may want to share your information around our group so they can use it for the same internal purposes as we do, as described in this policy (for example marketing where we think this might be of interest to you or we might want to store our data on one server).

It is possible that we could sell our business to a third party, or re-organise our business or become insolvent. In that scenario, our database of customers is one of the biggest parts of that business, so we would need to share it with the buyer and their advisers.

Sometimes, other people give us data about you which we may need for our legitimate business purposes. This may happen when you use another website that we link to.

Generally, we will use your information within ScholarPack. However, we may share with third party sites (e.g. Facebook, Google, Instagram, Snapchat and Twitter) some data, with appropriate security measures, to show you relevant advertising on third party sites.

Sometimes ScholarPack uses third parties to process your information on our behalf, for example to provide analysis. ScholarPack requires these third parties to comply strictly with its instructions and ScholarPack requires that they do not use your personal information for their own business purposes.

8. Sharing aggregated or anonymised information

We may share aggregated or anonymised information within and outside of ScholarPack, with partners such as research groups, policy groups, the DfE, or Ofsted. You will not be able to be identified from this information.

9. Offensive or inappropriate content on the ScholarPack website

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to the ScholarPack website or social media, ScholarPack may remove such content.

Where ScholarPack reasonably believes that you are or may be in breach of any applicable laws, for example on hate speech, or law enforcement agencies or your country is permitted under applicable laws,

We'll keep information in line with our data retention policy. For example, we'll normally keep your core information for a period of seven years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements. If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

11. How we protect your data

All information you provide to us is stored on our servers, and we have implemented reasonable and appropriate security measures to protect the data including HTTPS and the industry standard for encryption and SSL technology. Unfortunately, the internet does not guarantee that data breaches will never occur.

or addresses, credit-card details or other

12. Your rights

You have a number of rights in relation to the information that we hold about you under the data protections laws. These rights include:

- The right to access information we hold about you and to obtain information about how we process it
- In some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so
- In some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;
- The right to request that we rectify your information if it's inaccurate or incomplete
- In some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it
- The right to object to, and to request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing it and/or to refuse your request. You can exercise your rights by contacting us at support@scholarpack.com
- Individuals also have a right to complain to the UK Information Commissioner's Office by visiting <http://www.ico.org.uk>, or to the data protection regulator in the country where they live or work
- You have the right to ask us not to process your data for marketing purposes at any time by contacting us in the usual way or emailing us at support@scholarpack.com or calling 01522 716 049
- You have the right to access information we hold about you. Simply email us at dpo@scholarpack.com and we will tell you how to do this

13. What are Cookies?

A cookie is a piece of text stored on the hard drive of your computer, mobile phone or other portable device by your web browser. Broadly, this tool distinguishes you from other visitors to our websites and stores information about your website visits, and recognises you and your preferences each time you visit our websites.

There are different types of cookies:

Session cookies

These are specific to your browsing session and expire when your browser is closed or when you leave the site. These cookies ensure that you are recognised when you move from page to page within the sites, and any information entered is remembered.

Permanent/persistent cookies

These cookies remain, even when you have closed the browser. These cookies remember information so that you don't have to type them in every time you use the sites. Permanent cookies are stored on your device (browser or mobile device), and expire at a fixed point in time, or until you choose to delete them.

These cookies are used by third-party sites and are typically persistent. They allow us to remember certain things about you at a later time, such as your preferences or previous actions on our sites. Unless you choose to tell them, they will continue to remember this information.

These cookies also have different functions:

Performance cookies

These cookies collect information about how visitors are using the sites, e.g. which pages are most popular, when errors are being generated and testing different designs. Additionally, performance cookies allow us to count the number of visitors and measure how effective advertising metrics, user experience and site performance.

These cookies are used to enhance your navigation and improve the overall user experience based on choices you have made, so that we can

Strictly necessary cookies

These cookies are required for the sites to perform correctly.

Targeting and/or advertising cookies

These cookies track your visits to the sites, the links you have clicked and the articles you have viewed. ScholarPack uses this information to target and personalise our advertising, so that is more relevant to your needs.

14. Can I refuse cookie tracking?

Most web browsers allow some control of most cookies through the browser settings. If you turn off cookies, you may not be able to use all of our functionality. However, you will still be able to see content.

ScholarPack is committed to protecting your data and the information we collect about you online. You can withdraw your consent to accept cookies through settings on some of the most popular browsers, using the links below.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)

15. What cookies does ScholarPack use?

Below are two tables to explain ScholarPack's cookie functions and why they're used. They are placed on your device automatically when you visit the site. Some last only for the duration of your visit (session ID cookies) and these help you navigate the sites and use your browser 'back button', for example. Others are persistent and last after you leave the sites.

The following are third-party cookies used on the Sites.

Cookie Name	Use	Privacy Policy	Opt Out
	We use Google		s://chrome.google.com/webstore/detail/google-analytics-opt-out/ldcbbnekjdpkjompkollhgjncfkfopkdp
	Analytics uses cookies to help us analyse how users use the Site.		
	We use Google Tag Manager to		Check browser settings
Google Optimize	We use Google Optimize to place users into AB testing experiments, website testing & enhanced personalisation.	https://developers.google.com/optimize/dev/docs/quickstart	Check browser settings
Hotjar	We use Hotjar to aggregate data on how visitors to the Site are using it, building sample heatmaps of scrolling, clicking and mouse movement	https://www.hotjar.com/legal/policies/	https://www.hotjar.com/opt-out
Hubspot	We use Hubspot to identify site visitors, analyse the performance of email campaigns, track contact form submissions, evaluate paid media activity and monitor clicks through to landing pages.	https://legal.hubspot.com/privacy-policy	Check browser settings

Cookie Name	Use	Privacy Policy	Opt Out
	We use Zendesk		://www.youronlinechoices.e...
	Zendesk, Inc. (Zendesk) to allow users to contact our support team.		
Craft	We use Craft CMS to manage our	https://craftcms.com/privacy	https://craftcms.com/cookie-no...
networks	advertising to advertise our content to new and previous users.	LinkedIn: https://www.linkedin.com/legal... Twitter: https://twitter.com/privacy	book: https://www.facebook.com/setti... LinkedIn: https://www.linkedin.com/psett... Twitter: https://optout.aboutads.info/

If you would like to know more about cookies, including flash cookie and local storage devices, the following websites provide useful information: www.allaboutcookies.org, and www.youronlinechoices.eu.

Thank you for visiting our website.

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