



### 1. Purpose

The purpose of this privacy policy is to let users of global-proficiency.com (the "Site") know that we collect personal information and what we do with it. We don't use, share or transfer personal information in connection with the Site except as set out in this policy. By using the Site, You agree to the collection and use of information in accordance with this Privacy Policy.

# 2. Interpretation and Definitions

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

#### **Definitions**

For the purposes of this Privacy Policy:

**Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

**Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to both Global Proficiency Ltd and Global Proficiency Pty Ltd.

**Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

**Device** means any device that can access the Site such as a computer, a cellphone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

**Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

**Site** refers to Global Proficiency's website, accessible from https://www.global-proficiency.com.

**Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to Global Proficiency, accessible from https://www.global-proficiency.com

**You** means the individual accessing or using the Site, or the company, or other legal entity on behalf of which such individual is accessing or using the Site, as applicable.

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# 3. Collection, Storage and Use

You can use the Site without disclosing any personal information, however, you may be required to disclose personal information to us when you give feedback or in submission forms that can be used to contact or identify You. This information will be viewable by site administrators, and certain Global Proficiency staff. Please don't send us sensitive personal information or include any sensitive personal information in submission forms. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

# 4. Holding of information

- 4.1. If you provide personal information, it will be held by Global Proficiency. Email addresses are not made available to the public. Unless required by law, we won't publicise the names or email addresses of individuals who provide feedback to us or who provide us with submission forms without their consent.
- 4.2. We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.
- 4.3. The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.
- 4.4. Our website is hosted on the Wix.com platform. Wix.com provides us with the online platform that enables us to offer this Site. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

# 5. Use of personal information

- 5.1. We'll only use personal information provided to us for the purpose of administering, evaluating and improving the Site, improving our services and communicating with you (including responding to your feedback and information provided in submission forms).
- 5.2. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please see below for contact details.





#### 6. Feedback

Feedback is important and is used to evaluate and improve the Site. If you provide feedback by email or by using the feedback form, that feedback will be sent to appropriate Global Proficiency staff. This could include your email address and other identifying information that you've provided.

#### 7. Submission forms

If you provide us with a submission form, that submission form will be sent to appropriate Global Proficiency staff, including your email address and other identifying information that you've provided.

# 8. Usage Data

We may collect Usage Data about your visit to help us improve the Site. This information is aggregated and doesn't identify you personally. It includes:

- Your IP address.
- The search terms you used.
- The pages you accessed on our Site and the links you clicked on.
- The date and time you visited our Site.
- The referring site (if any) through which you clicked through to this Site.
- Your operating system and device type (e.g., Windows, Mac OS, Android, iOS).
- The type of web browser you use (e.g., Internet Explorer, Mozilla Firefox).
- Other things like your screen resolution and the language setting of your browser.
- Usage Data is viewable by Site administrators and certain other Global Proficiency staff.

# 9. Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Site and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Site. The technologies We use may include:

- Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Site. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Site may use Cookies.
- Web Beacons. Certain sections of our Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).



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Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

#### • Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

**Purpose:** These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

#### Cookies Policy / Notice Acceptance Cookies

**Type:** Persistent Cookies

Administered by: Us

**Purpose:** These Cookies identify if users have accepted the use of cookies on the Website.

#### Functionality Cookies

**Type:** Persistent Cookies

Administered by: Us

**Purpose:** These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

## 10. Disclosure of Your Personal Data

#### 10.1. Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

#### 10.2. Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).





#### 10.3. Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of the Company.
- Prevent or investigate possible wrongdoing in connection with the Service.
- Protect the personal safety of Users of the Service or the public.
- Protect against legal liability.

# 11. Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

# 12. Children's Privacy

- 12.1. Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.
- 12.2. If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

#### 13.Links to Other Websites

- 13.1. Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.
- 13.2. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### 14.Security

14.1. We take steps to protect the information you provide to Global Proficiency from loss, misuse, or unauthorised access. Your information will not be knowingly disclosed without your consent, however no method of transmission over the Internet, or method of electronic storage is 100%



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secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

#### 15.Credit Card Information

The credit card information provided by you to Global Proficiency will be stored in a confidential manner. Our staff may access such information only when there is an appropriate business reason to do so, such as when a refund must be issued back to the credit card. We maintain physical, electronic and procedural safeguards to protect your information, and our staff are required to follow these privacy standards. Global Proficiency does not disclose any nonpublic information (such as credit card numbers and their expiration dates) to anyone, except as required by law.

# **16.Transaction Security**

Global Proficiency uses a third-party payment provider, Stripe, to ensure transaction security. Your credit card details are not entered directly onto our Site which ensures they cannot be intercepted. Stripe's Privacy Policy can be viewed <u>here</u>.

# 17. Changes to this Privacy Policy

We may change this policy from time to time, and we will post any changes on this page. If you use the Services after those changes are in effect, you agree to the revised policy.

#### 18.Contact Us

If you have any questions about this Privacy Policy, You can contact us:

By email: enquiries@global-proficiency.com

By visiting this page on our website: https://www.global-proficiency.com

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