

1. Introduction

We are committed to safeguarding the privacy of our Skillbox visitors, buyers and sellers.

This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

In this policy, "we", "us" and "our" refer to Skillbox. For more information about us, see Section 17.

2. The personal data that we collect

In this Section 2 we have set out the general categories of personal data that Skillbox processes along with information about the source and specific categories of that data.

Category	Description	Source
Marketing data	Your email address, telephone number, postal address and other contact data collected from you for marketing purposes, along with data relating to the marketing communications that we send to you.	You, although metadata regarding marketing communications will be generated by our digital marketing software systems
Account and profile data	The Skillbox account and profile data may include your account identifier, name, email address, country of residence, nationality, birthplace, date of birth, business name, business details, account creation and modification dates, website settings, contract acceptance information, consent information and marketing preferences.	You, although some of this data – such as account creation and modification dates – will be generated by our website
Marketplace service data	Personal data that are incorporated into buyer job postings and seller skills package listings, insurance policy documents, qualification and certification documents, chat communications and other communications between users, and materials delivered by buyers to sellers or by sellers to buyers. This category also includes personal data included in invoices, statements and other	You, relevant other Skillbox user(s), and/or our payment services provider, MangoPay SA

	records of transactions entered into by buyers and sellers through our marketplace, such as party identities, transaction dates, transaction subject matter, transaction amounts and transaction taxes.	
Payments data	<p>Information in invoices and statements that we produce, and other information relating to payments that you make or are due to make to us, including payments of commission due to us with respect to marketplace transactions, fees for bolt-on services, payment processing fees, and KYC / KYB fees; this information may include your name, your contact details, transaction dates, transaction subject matter, transaction amounts and transaction taxes.</p> <p>Note that full credit and debit card details will be handled exclusively by our payment services provider, MangoPay SA; we do not collect or store full card details.</p>	You and/or our payment services provider, MangoPay SA
General communications data	Information contained in or relating to any service messages that we send to you, and any other communications that you send to us or that we send to you; the information may include the communication content and metadata associated with the communication.	You, although our website will generate the metadata associated with communications made using the website contact forms
Analytics data	Data about your use of our website and services; this may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.	Our analytics tracking systems: see below for more details

3. Purposes of processing and legal bases

In this Section 3, we have set out the purposes for which Skillbox may process personal data and the legal bases of the processing.

Purpose	Data categories and details of processing	Legal basis of processing
Operations	Your personal data: operating our website, the management of user accounts (including viewing user account information and editing user data from the user's perspective through an "impersonate user" function), the carrying out of KYC and KYB checks on sellers, the facilitation of communications, transactions and service delivery between users of our marketplace, the processing of payments for sellers, the processing of payments by buyers and sellers to us, generating invoices, bills and other payment-related documentation, credit control, and the provision of our services generally.	Our legitimate interests, namely the proper administration of our website, marketplace, other services and business generally
Publications	Your account and profile data and marketplace service data: publishing such data on our website and elsewhere in order to provide our services, in accordance with the instructions you give to us and/or the licences you grant to us.	Our legitimate interests, namely the publication of content in the ordinary course of our operations
Relationships and communications	Your account and profile data and general communications data: managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post and/or telephone, providing support services and complaint handling.	Our legitimate interests, namely communications with our website visitors, buyers and sellers and the proper administration of our website, marketplace, other services and business generally
Personalisation	Your account and profile data, marketplace service data and analytics data: personalising the content and advertisements that you see on our website and through our services to ensure that you only see material that is relevant to you; where appropriate, highlighting your activity on the website to other users, including in "top seller" listings and when highlighting relevant seller profiles to buyers.	Our legitimate interests, namely offering the best possible experience for our website visitors and service users

Direct marketing	Your marketing data and account and profile data: creating, targeting and sending direct marketing communications by email, SMS and/or post and making contact by telephone for marketing-related purposes.	In some cases, we will ask for your express consent to this processing, in which case the legal basis of the processing will, of course, be consent; in all other cases, the legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and marketplace service users
Research and analysis	Your marketplace service data and analytics data: researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business; creating aggregated data sets (that may not incorporate personal data).	Our legitimate interests, namely monitoring, supporting, improving and securing our website, marketplace, other services and business generally
Record keeping	Your personal data: creating and maintaining our databases, back-up copies of our databases and our business records generally, and restoring data from back-up copies.	Our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy
Security	Your personal data: security and the prevention of fraud and other criminal activity.	Our legitimate interests, namely the protection of our website, services and business, and the protection of others
Insurance and risk management	Your personal data: obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice.	Our legitimate interests, namely the proper protection of our business against risks
Legal claims	Your personal data: the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.	Our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others
Legal compliance and vital interests	Your personal data: compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.	Legal compliance / vital interests

4. Providing your personal data to others

When you communicate with other Skillbox users through our services, the contents of those communications will of course be shared with the relevant users; similarly, when you transact with other users through our marketplace, relevant transaction information will be shared.

Sellers will typically act as independent controllers with respect to at least some of the marketplace service data and account and profile data that you or we disclose or make available to them by means of our services or in connection with our services. To the extent that a seller acts as a controller with respect to your personal data, the seller should make a privacy policy or notice available to you, whether or not via our services, detailing how the seller will handle that personal data. We are not responsible for how sellers or other Skillbox users handle your personal data.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

We may disclose your personal data to our service providers, suppliers and subcontractors identified at <https://skillbox.co.uk/service-providers> insofar as reasonably necessary for the purpose set out in this policy.

Financial transactions relating to our marketplace, including transactions between buyers and sellers and payments to us, as well as know-your-client (KYC) and know-your-business (KYB) checks, are handled by our payment services providers, MangoPay SA. We will share marketplace service data and transaction data with MangoPay only to the extent necessary for the purposes of processing your payments, refunding such payments, carrying out KYC and KYB checks, and dealing with complaints and queries relating to such payments, refunds and checks. You can find information about MangoPay' privacy policies and practices at https://www.mangopay.com/en_UK/privacy/.

We may disclose your personal data to any person or entity that purchases or otherwise takes over all or part of our business; the use of your personal data by such a person or entity shall be subject to this policy.

In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

In this Section 5, we provide information about the circumstances in which personal data provided to or generated by Skillbox may be transferred to a third country under UK data protection law.

We may transfer your personal data from the UK to the European Economic Area (EEA) and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states benefit from adequacy regulations under UK data protection law. We may also transfer your personal data from the EEA to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK benefits from an adequacy decision under EU data protection law.

Some of our services providers, suppliers and subcontractors are based outside the UK and the EEA. You can find out information about related transfers and the safeguards used to protect such transfers at <https://skillbox.co.uk/service-providers>.

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

This Section 6 sets out the Skillbox data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain your personal data as follows.

Category	Retention period
Marketing data	Between 6 and 18 months following the later of: (a) date of the most recent contact between you and us; and (b) the date of removal of applicable contact information from any suppression list that we maintain from time to time
Account and profile data	A minimum period of 6 years following the date of closure of the relevant account, and for a maximum period of 7 years following that date
Marketplace service data	A minimum period of 6 years following the date of termination of the relevant contract, and for a maximum period of 7 years following that date

Payments data	A minimum period of 6 years and a maximum of 12 years following the date of the relevant transaction, subject to applicable law
General communications data	A minimum period of 6 years following the date of the communication in question, and for a maximum period of 7 years following that date
Analytics data	36 months following the date of collection

If you grant to us a licence to publish any of your personal data, we may continue to retain and publish that personal data after the end of the relevant retention period specified in this Section 6 in accordance with the applicable licence terms, subject to your data subject rights. If we cease to publish such personal data after the end of the relevant retention period specified in this Section 6, that personal data will be retained for a minimum period of 6 years and a maximum period of 7 years following the date that publication ceases.

Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Your rights

In this Section 7, we have listed the rights that you have under data protection law.

Your principal rights under data protection law are:

- **the right to access** - you can ask for copies of your personal data;
- **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- **the right to erasure** - you can ask us to erase your personal data;
- **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- **the right to object to processing** - you can object to the processing of your personal data;
- **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and

- **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. Third party websites

Skillbox includes hyperlinks to, and details of, third party websites.

In general, we have no control over, and are not responsible for, the privacy policies and practices of third parties.

9. Personal data of children

The Skillbox website and services are targeted at persons over the age of 18.

If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

10. Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

11. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

12. Cookies that we use

Skillbox uses cookies for the following purposes:

- **authentication and status** - we use cookies to identify administrative users when they visit our website, to identify you as you navigate our website, and to help us determine if you are logged into our website;
- **marketplace transactions** - we use cookies to enable you to transact with other users via the website and use other website functionality;

- **personalisation** - we use cookies to store information about your preferences and to personalise our website for you;
- **security** - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- **analysis** - we use cookies to help us to analyse the use and performance of our website and services; and
- **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally.

13. Cookies used by our service providers

We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://policies.google.com/technologies/partner-sites> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

We use a Facebook pixel on our website. Using the pixel, Facebook collects information about the users and use of our website. The information is used to personalise Facebook advertisements and to analyse the use of our website. To find out more about the Facebook pixel and about Facebook's use of personal data generally, see the Facebook cookie policy at <https://www.facebook.com/policies/cookies/> and the Facebook privacy policy at <https://www.facebook.com/about/privacy>. The Facebook cookie policy includes information about controlling Facebook's use of cookies to show you advertisements. If you are a registered Facebook user, you can adjust how advertisements are targeted by following the instructions at <https://www.facebook.com/help/568137493302217>.

14. Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647> (Chrome);
- <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
- <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/en-gb/guide/safari/sfri11471/mac> (Safari); and
- <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

15. Cookie preferences

You can manage your preferences relating to the use of cookies by visiting: <https://www.civicuk.com>

16. Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of significant changes to this policy by email.

17. Our details

This website is owned and operated by M Ginete trading as Skillbox.

Our principal place of business is at Skillbox, 27 Old Gloucester Street, London, WC1N 3AX.

You can contact us:

- by post, to the postal address given above;
- using our website contact form; or
- by email, using the email address published on our website.

18. Data protection registration

We are registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is **ZB557952**.