# **Privacy Policy**

# agurney.com (+ sub domains) and your personal data

May 24th 2018

### Overview

agurney.com comprises several sub-domains that are used for personal purposes, and to provide *pro bono* services for a variety of local groups.

## agurney.com and your Personal Data

### Privacy and personal data

We take your privacy seriously. In order that we can provide access to our services we may require to store some personal information about you.

### What is collected?

For the general web sites, no information is stored or retained, over and above the basic web access logs that record the page that was visited, when, and the visitor's IP address.

For the eLearning site (wesc.agurney.com) basic profile information is collected from you when you create your account, or when an account is created for you. Your name (first and last names) and email address are stored. Additionally, we may also store information about your club if provided. We will also store any personal information that you may have added to your personal profile, such as address, telephone number or photograph.

As you use the eLearning site, information about the users, courses, activities and resources you interact with is also stored and linked to your profile information, as are the timestamps of any operations and your IP address at that time.

#### Cookie Statement

Cookies are small pieces of data sent from a web site that are stored on the user's computer by the user's web browser while the user is browsing.

The eLearning site uses the Moodle eLearning platform. Moodle cookies are used so that users can log in to this site with cleaner and safer URLs of pages they visit while browsing. The following cookies are used by the Safe Shooting eLearning system:

The essential one is the session cookie, usually called **MoodleSession**. You must allow this cookie into your browser to provide continuity and maintain 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).

The other cookie is purely for convenience, usually called something like **MOODLEID**. It just remembers your username within the browser. This means when you return to this site the username field on the login page will be already filled out for you. It is safe to refuse this cookie - you will just have to retype your username every time you log in.

Most agurney.com web pages use the Joomla CMS. Joomla uses a session cookie to track user activity on the site; when the session is over, this cookie is cleared and no history of the session is retained.

Google AdSense is used to provide adverts on some agurney.com pages. agurney.com has no knowledge of, nor control over, the cookies that are contained in the Google Adsense adverts. No information is shared with Google.

#### How is this information used?

The Moodle cookies are only used to provide access to the online courses on this site, and to track your progress through those courses.

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### **Sharing your Data**

Data obtained by agurney.com is not shared with other applications, users or 3<sup>rd</sup> parties, unless there is a specific training requirement – for example to know if a user has completed a specific course, or achieved a particular grade in a test. Your personal data stored in agurney.com is not used for marketing or other purposes.

## For how long is my Data Stored?

Your personal data is stored while you are enrolled and active in one or more online courses on this site. Customer account and profile information will be removed when an account has not been accessed for 36 consecutive months; where the location of an inactive user is known, accounts will be expired according to the local requirements if less. 36 months may seem excessive, however users accessing the Safe Shooting Quiz tend to only log in once a year when the annual requirement is due, and this period ensures a modicum of continuity.

# **Lawful Basis for Processing**

We will only collect personal data about you where we have lawful basis. Lawful basis includes consent. Your consent is required otherwise you will not be able to access the training materials. We do not collect personal data on other sub-domains and you do not need to provide personal information to browse our web pages.

At any time, if you wish to withdraw your consent please email <a href="mailto:GDPR@agurney.com">GDPR@agurney.com</a>

## **Rights of the Data Subject**

For personal data that we have about you:

- Delete Data: You can ask us to erase or delete all or some of your personal data (for example, if it is no longer necessary to provide services to you).
- Change or Correct Data: You can ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- Object to, or Limit or Restrict, Use of Data: You can ask us to stop using all or some of your personal
  data (for example, if we have no legal right to keep using it) or to limit our use of it (for example, if your
  personal data is inaccurate or unlawfully held).
- Right to Access and/or Take Your Data: You can email us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form GDPR@agurney.com

To request details of your personal data stored in agurney.com, request a correction to the information that is stored, or request that your account be closed and your data erased, please send an email with details of the request to GDPR@agurney.com.

**Note** Where possible, use the same address that you use to access the eLearning system.

## **Cross-Border Data Transfer**

agurney.com stores your data inside the EU, and is managed from the UK.

### **Data Controller and contact information**

Alisdair Gurney is the Data Controller of personal information that is stored by agurney.com and its sub-domains.

The Data Controller can be contacted by Email: GDPR@agurney.com

Date	Description	Author
May 24 <sup>th</sup> 2018	New document	AG