

NUDGE

EDUCATION

Privacy Policy: Web users Last Updated: 19/06/2025

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Version: v2.1 **Classification:** Public **Author:** Brian Mair

Who we are

Nudge Education Limited (“Nudge”, “we”, “us”, “our”), company no. **10192753**, **Sirius House, Amethyst Road, Newcastle upon Tyne, NE4 7YL**. We are the **controller** for the processing described here.

Data Protection Officer (DPO): Data Protection People, The Tannery, 91 Kirkstall Road, Leeds LS3 1HS · 0113 869 1290 · dataprotectionpeople.com

Data Protection Lead (operations): Brian Mair · 07958 440 937
privacy@nudgeeducation.co.uk

What we collect

- **Contact details** you submit (e.g., via forms): name, email, phone.
- **Technical/usage data:** IP address, device identifiers, pages visited, time zone, basic analytics. (IP addresses are personal data.) Your current policy references Google Analytics and Squarespace analytics capturing IP.

How we get it

- Directly from you (forms, emails).
- Automatically via cookies/analytics (see Cookies section).

Why we use it & lawful bases

- **Respond to your enquiries; secure, operate and improve the site — Legitimate interests** (Article 6(1)(f))
- **Non-essential analytics/marketing cookies — Consent** (Article 6(1)(a)); we do **not** set these until you consent via the banner (PECR).

Cookies

- **Strictly necessary cookies** run without consent.
- **All other cookies (analytics/marketing/social)** run **only with your consent** via our cookie banner. You can change choices anytime via “Cookie Settings”.

Sharing

We use vetted **service providers (processors)** for hosting, analytics, security and CRM; they act on our instructions under Article 28 agreements

International transfers

Some providers/sub-processors may be outside the UK. We use UK adequacy decisions and/or the **UK IDTA/UK Addendum to SCCs** plus supplementary measures where needed.

How long we keep it

- **Website enquiries/CRM contacts:** up to **7 years** or until you ask us to remove you.
- **Cookie data:** per cookie expiry (see Cookie Policy); you can withdraw consent at any time.

Your rights

Access, rectification, erasure, restriction, portability, and objection, plus the right to withdraw consent. Some limits may apply. Contact our DPO or Data Protection Lead. We aim to reply within one month.

Complaints

You can complain to the **ICO** (ico.org.uk; 0303 123 1113). We'd like the chance to resolve concerns first so contact us at: talk2nudge@nudgeeducation.co.uk

Changes

We update this notice as our processing changes and will post updates here (and notify you by email where appropriate).

Cookie Policy

What are cookies?

Cookies are small text files stored on your device when you visit a website. They help the site function, keep it secure, remember your choices, and (with your permission) help us understand how people use our site.

We also use similar technologies (e.g., pixels, local storage, SDKs). In this policy, “cookies” includes these tools.

Personal data: Analytics can capture **IP addresses** and online identifiers which are personal data under UK GDPR.

Our legal basis and consent (PECR + UK GDPR)

- **Strictly necessary cookies** run on the basis of our **legitimate interests** (Article 6(1)(f)) and do **not** require consent under PECR.
- **All other cookies** (analytics, advertising, social media) are set **only with your consent** (Article 6(1)(a)). We use a cookie banner/manager to collect and record your choices and to block non-essential cookies until you opt in,

You can change or withdraw consent at any time.

How we use cookies (categories)

- **Strictly necessary** – required for core site functions (security, load balancing, login, cookie consent records).
Preferences – remember settings (e.g., language).
Analytics – measure usage so we can improve our content and services. We configure analytics to minimise data and enable IP masking where possible.
- **Marketing/social** – measure campaign performance or enable social media embeds. We only use these with your consent.

Third-party cookies

Some cookies are set by third parties (e.g., Google, Meta, LinkedIn) when their content or tags load on our pages. These third parties control their cookies and may use them for their own purposes. See their privacy/cookie notices for details. We only load them after you consent.

International transfers

Some providers (or their sub-processors) may process data **outside the UK** (e.g., the US). Where that happens, we rely on UK adequacy regulations and/or the **UK International**

Data Transfer Agreement (IDTA) or **UK Addendum to the EU SCCs**, plus additional measures where needed. Ask us for a copy or summary of the relevant safeguards.

How to change or withdraw your consent

- Use the **“Cookie Settings”** link in our footer to review or change your choices at any time.
- You can also clear cookies via your browser; this removes existing cookies but may not prevent new ones unless you change your browser settings.

Managing cookies in your browser

You can block or delete cookies in your browser. Guidance is available from providers like:

- Chrome, Edge, Firefox, Safari (see in-browser help), or
- independent guides such as **allaboutcookies.org** (external resource).

Blocking some cookies may impact site functionality.

Do Not Track & Global Privacy Control

If your browser sends **Global Privacy Control (GPC)** or **Do Not Track** signals, we treat them as an opt-out from non-essential cookies where technically feasible, but please also use **Cookie Settings** for the most reliable control.

How long we keep cookie data

- Analytics data are retained only as long as necessary for reporting and improvement; we regularly review retention settings.
- Where possible, we aggregate or anonymise analytics to reduce personal data use.

Updates to this policy

We'll update this policy if our cookies or providers change, or if law/guidance changes. We'll post the new version here and update the “Last updated” date. Your current privacy materials already commit to posting updates and, where appropriate, notifying by email.

Contact

Email **privacy@nudgeeducation.co.uk** or contact our DPO (see Privacy Notice).