

# Privacy, Security and Cookie Policy

Thank you for visiting The Progress Minded website or using our services. Our Privacy, Security and Cookie Policy explains the what, how and why of the information we collect when you visit our website or you use our Services.

It also explains the specific ways we use and disclose that information. We want to make it clear, we take your privacy extremely seriously, and we never sell your data for sales or marketing use. Our aim is to be as clear and open as possible about what we do and why.

We are committed to ensuring that your privacy is protected at all times. Should we ask you to provide certain information by which you can be identified when using this website or our services, then you can be assured that it will only be used in accordance with this privacy statement.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you comply with any changes.

This Policy is effective and updated as of 5<sup>th</sup> January 2023.

## Who we are?

**JGA LIMITED** (Trading as Progress Minded), Company No. 04743325

Address: Progress Minded, Unit G01, Ground Floor, Metroline House, 118-122 College Road, Harrow, Middlesex HA1 1BQ. Tel: 020 3869 0245 | Email: [enquiries@progressminded.co.uk](mailto:enquiries@progressminded.co.uk)

**Our Data Protection Officer:** Susan Prestridge

Contact email address: [Susan.prestridge@jga-group.co.uk](mailto:Susan.prestridge@jga-group.co.uk)

We aim to respect your privacy and are committed to protecting the confidentiality of your personal information. Our aim is to be as clear and open as possible about what we do and why, which is why we go in-depth below to explain what we collect, send and use your data for and what your rights are.

## General Basics

### 1) Definitions

These definitions should help you understand this policy and add clarity to any terms/labels we use.

When we say “we,” “us,” “our” and “Progress Minded” we are referring to JGA LIMITED. We are incorporated in England and Wales, providing education and training services (commonly referred to as training solution services) that you may use to develop your career prospects.

When we say “Customer,” we are referring to the person or entity that is registered with us to use our Services.

When we say “Services” we are referring to our training, assessment, recruitment or career management services.

When we say “you,” we are referring either to a Customer or to some other person who visits our Website or contacts us directly.

“Personal Information” means any information that identifies or can be used to identify you, directly or indirectly, including, but not limited to, first and last name, email address, occupation or other demographic information.

This Privacy, Security & Cookie policy applies to this specific website, as well as any other sites or mobile applications owned or operated by us. The website, and any web pages, interactive features, applications, widgets, blogs, social networks, social network “tabs” or other online, mobile or wireless offerings that post a link to this Privacy, Security & Cookie policy, whether accessed via computer, mobile device or other technology, manner or means.

You’ll see we are committed to protecting any data that we collect concerning you. By using our Services and website you agree to the use of the data that we collect in accordance with this Privacy, Security & Cookie policy.

## 2) Scope & Changes

This Privacy Policy is effective with respect to any data that we have collected, or collect, about and/or from you, according to our terms of service.

We may change this Privacy, Security & Cookie policy at any time and it will supersede this version of our Policy. The most recent version of the Privacy, Security & Cookie policy is reflected by the version date at the top of this Privacy, Security & Cookie Policy. All updates and amendments are effective immediately upon notice, which may be given by any means, including, but not limited to, by posting a revised version of this Privacy, Security & Cookie Policy or other notice on the website.

We will take reasonable steps to draw your attention to any changes; however, we encourage you to review this Privacy, Security & Cookie Policy often to stay informed of changes that may affect you, as your continued use of the website signifies your continuing consent to be bound by this Privacy, Security & Cookie Policy. Our electronically or otherwise properly stored copies of this Privacy, Security & Cookie Policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy, Security & Cookie Policy which were in effect on each respective date you visited the Website.

## Why we Process Your Personal Information

We process your personal data primarily on the basis of Legitimate Interest as a business but only if necessary for the purpose we collected it for. We will also process data on the basis of contractual and legal obligation where necessary. We may process your data for;

- Sales and marketing activities such as calls, emails and other types of communications
- Understanding how you interact with the website and social media
- Account activity such as email, written and verbal communications and agreements
- Financial activity, such as billing communications
- Health & Safety activity, such as Safeguarding & Prevent notifications
- To perform obligations under a contract with you or a business you may work for

We will only store your data for as long as we need it to undertake any of the processes listed above.

## What Information We Collect

We will collect personal and business information about you when you contact us directly, when you complete an enquiry or application form and when you contract with us.

Features on this website may collect the following information:

- Your name & contact information including email addresses & telephone numbers
- Demographic information such as your address, preferences and interests
- Other information relevant to customer surveys and or offers

If you enrol on a programme with us, we will collect information about you. This includes full name, contact details, date of birth, and National Insurance number. We also collect information when you participate in learning activities, and when you provide feedback.

## Special Category Data

You may voluntarily consent to provide us with sensitive personal data about yourself (e.g. details of your ethnic origin) as part of a course enrolment or recruitment process. We use this sensitive data to track the diversity of applicants, ensure that our clients are presented with a diverse selection of candidates, to track success of candidates from different ethnic groups, and to ensure that we have no internal biases. However, we also collect your ethnicity because we are required to collect and report this information to the Education & Skills Funding Agency (ESFA), the government agency that regulates apprenticeship training. We protect this information by ensuring this information is not made visible to our clients and minimise the members of our team who can access this. We may also use this data in anonymised datasets, which removes your personal identifiers, for the purposes of understanding our users and candidate pool, equality monitoring and reporting purposes, and as aggregated data for marketing purposes.

## How we Collect Information about You

### a) Information you provide

When you submit information via forms on the website, use our Services, consult with a member of our team, send us an email, post on our blog, or communicate with us in any way, you are voluntarily giving us information that we collect.

That information may include your name, physical address, email address, IP address, phone number, as well as details including occupation, location, history, and other demographic information. By giving us this information, you agree to this information being collected, used, disclosed, transferred within the United Kingdom (to our data storage centre in England) and stored by us, as described in our Terms & Conditions and in this Privacy, Security & Cookie policy.

Ways in which our website may capture your personal information:

- By filling in & submitting a contact form or booking form
- By subscribing to a mailing list
- By using social media links
- By interacting with an online chat client
- By commenting on posts or pages on our website

### b) Automatically

When you browse our website or use our Services, we may collect information about your visit to our website, your usage of our Services, and your web browsing. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our website or Services.

We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. Our use of cookies and other tracking technologies is discussed in more detail in our Cookie Policy section below. To ensure our prospects and clients receive the most relevant communications, we use some automated processes to send you communications. These processes (such as lead scoring and marketing based on behaviour), might indicate what the contents of a marketing email may be, or indicate to us when the best time to contact you might be.

### c) IP address lookup

We use third parties to provide information about visitors to our websites. When you visit our website we will record your IP address. This address will be matched against public and proprietary IP address databases to provide us with information about your visit. This information may identify the organisation to whom the IP address is registered but not individuals. In some limited cases i.e. single person companies, it may be possible to identify personal data from publicly available ICANN data.

#### d) Cookies, tracking & beacons

We may use various technologies to collect and store information when you use our website or Services, and this may include using cookies and similar tracking technologies, such as pixels and web beacons, to analyse trends, administer the website, track users' movements around the website and Services, serve targeted advertisements, and gather demographic information about our user base as a whole.

**Cookies/tracking:** Cookies allow us to provide important site functionality, so you don't have to re-enter lots of information. They also allow us to remember what links and pages have been clicked or viewed during a session. If you have provided us with personal data, completing a contact form for example, we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you.

For more information about our use of cookies and other tracking technologies, as well as how to opt out of the use of cookies, please refer to the Cookies section below.

#### e) Data sources

Other than the aforementioned ways of obtaining data (form fills on the website, cookies, verbal and written) we may obtain information about you from third party sources, such as public databases, data service companies, social media platforms, third party data providers and our joint marketing partners. We take steps to ensure that such third parties are legally permitted or required to disclose such information to us.

Examples of the information we may receive from other sources include: demographic information, device information (such as IP addresses), location, email address, contact number, technographics, and online behavioural data (such as information about your use of social media websites, page view information, and search results and links). We use this information, alone or in combination with other information (including Personal Information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products features, and services.

### Who will see your data?

Progress Minded operates a role-based access policy for personal data. What this means, is that an employee will only have access to personal data if they need that access to do their job. We do not share the personal data of prospects or clients with any third parties for marketing purposes.

We may need to share your personal data with our agencies and suppliers (including any intermediaries or other product providers involved in the delivery of your training) in order to deliver and administer your training or provide other Services to you.

This includes the Education and Skills Funding Agency, the executive government agency of the UK Department for Education, with which we share learner data in accordance with the

terms and conditions of funding imposed on providers of learning and our legal obligation as a training provider.

We may also use third parties, like service providers, agents or contractors to provide support and administration assistance for the internal operations of our websites, event registration systems, applications and online advertisements. These third parties may come into contact with your personal information in the course of providing their services to us.

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.

## Cookies

Cookies are small text files that are placed on to your computer by websites that you visit. They are used to make websites work, to improve efficiency of websites, to improve the user's experience and to provide usage information on websites. This information should make your website visits more productive by storing and using information on your website preferences and habits.

Your web browser can choose whether or not to accept cookies. Most web browser software is initially set up to accept them.

We may offer cookies to you and you should ensure that your web browser is set up to not accept cookies if you do not wish to receive them. Please note that if you disable cookies, some services or website functionality may not be available. For further information about cookies and how to disable them please go to [aboutcookies.org](http://aboutcookies.org).

We use the following types of cookies:

- **Essential cookies.** These are cookies that are required for the operation of our website.
- **Analytical cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We usually aggregate the data for review but in some cases, we may collect information on content you have viewed in order to understand what interests you most.
- **Marketing cookies.** These cookies are used to show advertising that is likely to be of interest to you based on your browsing habits. These cookies, as served by our content and/or advertising providers, may combine information they collected from our website with other information they have independently collected relating to your web browser's activities across their network of websites.

By continuing to use this site, you are accepting our use of these cookies that make

advertising and communications more relevant to you and your interests and further help us to improve the site.

By using your browser controls, you are always in control of the cookies we store and access on your computer. More information on how to control cookies and limit personal data processing can be found at [www.youronlinechoices.com/uk/five-top-tips](http://www.youronlinechoices.com/uk/five-top-tips). For comprehensive information on how to change your cookie settings in a wide variety of different web browsers, visit [www.aboutcookies.org](http://www.aboutcookies.org).

Users can also control the use of cookies at the individual browser level. We partner with third parties to display advertising on our website or to manage and serve our advertising on other sites. Our third party partners may use cookies or similar tracking technologies in order to provide you advertising or other content based upon your browsing activities and interests.

If you wish to opt out of interest-based advertising click <http://www.youronlinechoices.eu/>. Please note you might continue to receive generic ads.

## Tracking & Analytics

### a) Google Analytics

Google Analytics is a website monitoring tool that allows users to see volumes of website visitors, their source, and to analyse how the content of their website is viewed and navigated. This in turn allows optimisation of the content and pages and the marketing programs that drive traffic to the website. Google Analytics does not store any personal information about website visitors, but does use persistent cookies to identify repeat visitors. You may universally opt-out of all Google Analytics tracking used by all websites by visiting the following URL – <https://tools.google.com/dlpage/gaoptout>.

We have implemented Google Analytics Demographics and Interest Reporting. This is used to gain an insight into the age, gender and interests of our users to help us make decisions on how to improve the website in the future. Users can opt out of this reporting by visiting [Google Ads Settings](#).

You can find out more about Google's position on privacy as regards its analytics service at [Google support](#).

### b) GatorLeads

GatorLeads is a tool that identifies the business or organisation that website visitors belong to, based on a reverse IP Lookup. GatorLeads also use cookies to process this identification, and personal information about individual users is stored. Cookies used by GatorLeads store information about your current web browsing session (pages viewed, time on site etc) and the dates and times of previous website visits.



This information is used by Progress Minded to profile website visitors, in order to better understand the way in which our website content is viewed by different segments. It is also used, for example, to identify the types of organisations that might be interested in attending our events.

#### **c) Email Marketing Post-Click Tracking**

These cookies are used to report on the pages that have been viewed by visitors to the site who have followed links from our email marketing campaigns. We analyse how you interact with website and email content to enable us to provide you with better and more relevant content.

#### **d) Beacons/Pixels**

On our website and in our emails we use web beacons. When we send emails to Customers, we may track behaviour such as who opened the emails, who clicked the links and which pages of our website they have visited.

This allows us to measure the performance of our email campaigns and to improve our Services and website. To do this, we include single pixel, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

## List of cookies used

Cookie	Description	Duration	Type
VISITOR_INFO1_LIVE	This cookie is set by YouTube. Used to track the information of the embedded YouTube videos on a website.	5 months	Marketing
YSC	This cookie is set by YouTube and is used to track the views of embedded videos.	Session	Performance
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	2 years	Analytics
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.	1 day	Analytics
_gat	This cookie is installed by Google Universal Analytics to throttle the request rate to limit the collection of data on high traffic sites.	1 minute	Analytics
_gcl_au	This cookie is used by Google Analytics to understand user interaction with the website.	2 months	Analytics
collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session	Analytics
ads/ga-audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.	Session	Marketing
_hjAbsoluteSessionInProgress	This cookie is set by Hotjar. It is used to count how many times a web site has been visited by different visitors - this is done by assigning the visitor an ID, so the visitor does not get registered twice.	30 mins	Analytics
_hjid	This cookie is set by Hotjar. It sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	1 year	Analytics
_hjIncludedInPageviewSample	This cookie is set by Hotjar. It determines if the user's navigation should be registered in a certain statistical placeholder.	30 mins	Analytics
_hjTLDTest	Detects the SEO-ranking for the current website. This service is part of a third-party statistics and analysis service.	Session	Analytics
JCS_INENREF	The cookie is a part of the website security measures and is used for anti-spam purposes.	1 hour	Necessary
JCS_INENTIM	The cookie is a part of the website security measures and is used for anti-spam purposes.	1 hour	Necessary
_wpss_h_	This cookie is used for anti-spam and security of the website.	1 hour	Necessary
_wpss_p_	This cookie is used for anti-spam and security of the website.	1 hour	Necessary

wow.anonymousId	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	2 years	Analytics
wow.schedule	This cookie is set by Communigator. It enables a load balanced session queue.	20 minutes	Necessary
wow.session	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	20 minutes	Analytics
wow.utmvalues	Used to measure the efficiency of the website's advertisement efforts, by collecting data on the conversion rate of the website's ads across multiple websites.	20 minutes	Marketing
test_cookie	This cookie is set by doubleclick.net. The purpose of the cookie is to determine if the users' browser supports cookies.	15 minutes	Marketing
AWSELB	This cookie is associated with Amazon Web Services and is used for managing sticky sessions across production servers.	1 day	Necessary
AWSELBCORS	Registers which server-cluster is serving the visitor. This is used in context with load balancing, in order to optimize user experience.	Session	Session
adrac_412_init	Unclassified	Session	Other
symfony	Used to remember which products have been added to shopping-cart. This allows the user to close the browser and return to the website without losing the items in the shopping-cart.	Session	Analytics
adrac_412	Unclassified	1 year	Other
UserMatchHistory	This cookie is set by LinkedIn. It is used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor's preferences.	4 weeks	Marketing
lang	This cookie is used to store the language preferences of a user to serve up content in that stored language the next time user visit the website.	Session	Functional
bcookie	This cookie is set by LinkedIn. The purpose of the cookie is to enable LinkedIn functionalities on the page.	2 years	Functional
lissc	This cookie is provided by LinkedIn. This cookie is used for tracking embedded service.	1 year	Analytics
lidc	This cookie is set by LinkedIn and used for routing.	1 day	Functional
bscookie	This cookie is a browser ID cookie set by Linked share Buttons and ad tags.	2 years	Marketing
d/px	Collects data on visitors' preferences and behaviour on the website - This information is used make content and advertisement more relevant to the specific visitor.	Session	Marketing
IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year	Marketing

## How we use your information

We may disclose Personal Information and use personal data acquired from and provided by yourself to fulfil any of your requests and to send you appropriate and useful communications. You should be aware this includes, but is not limited to, the types of communications explained below.

We use your data for the following purposes:

**a) To promote use of our products and services to you.**

For example, if we collect your Personal Information when you visit our website and do not sign up for any of the Services, we may send you an email inviting you to sign up or attend an event. If you use any of our Services or website and we think you might benefit from using another part of our Services we offer, we may send you an email about that. You can stop receiving our promotional emails by following the opt-out link included in every email we send.

In addition, we may use information we collect in order to advertise our products and/or Services to you or suggest additional features of our Services that you might consider using. In addition, we may use your Personal Information to advertise our Services to potential or other users like you. For more information on how we use cookies or other tracking technologies for these purposes, as well as how to opt out of the use of cookies, please see the Cookies section.

**b) To send you informational and promotional content in accordance with your marketing preferences.**

You can stop receiving our promotional emails by following the opt-out instructions included in every email.

**c) To provide, support, and improve the Services we offer.**

**d) To transfer your information in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition.**

In that event, any acquirer will be subject to our obligations under this Privacy Policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our website.

## Types of communications

By processing your Personal Information under Legitimate Interest, you will receive any specific piece(s) of information you requested, as well as allowing us to send you appropriate and useful communications. This includes but is not limited to; invitations to our industry leading events and webinars, our latest assets (whitepapers, guides, reports, infographics, videos and case studies) and promotional offers. We would also like to keep you abreast of the charity events and initiatives we partake in. If you are a Customer of Progress Minded, you may also receive updates about service developments.

At any time, you can update your preferences (or completely unsubscribe/opt-out of our marketing) by clicking the opt-out link in any emails you receive from us. The link will always be in the footer of the email. You can also stop receiving emails from us using that same link. If you don't have an email from us to hand and want to update your preferences, email [enquiries@progressminded.co.uk](mailto:enquiries@progressminded.co.uk). We will send you an email for you to change your preferences as you wish.

## Links to other websites

Our website also contains links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy notice. You should always look at the privacy notice applicable to the website in question.

## Questions, Concerns and Contact Information

If you have any questions or comments, or if you want to update, delete or change any Personal Information we hold, or you have a concern about the way in which we have handled any privacy matter, please contact our Data Protection Officer (DPO) through the following ways:

Data Protection Officer: Susan Prestridge

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118-122 College Road  
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