

# Online Courses and Legal Stuff – Privacy Statement

*Effective date: 21 September 2021*

## What this statement does

This statement explains how we handle your personal information when you sign up to our newsletter email list, seek access to a free download or similar offering, enrol in one of our courses, or otherwise interact with us in relation to our courses or other services. When we use the terms:

- **personal information**, we mean information about identified or identifiable individuals (some countries call it "personal data"); and
- **we, us or our**, we are referring to Richard Best, trading as Online Courses and Legal Stuff, of Level 8, 23 Waring Taylor Street, Wellington 6011, New Zealand. You should also familiarise yourself with our Terms of Use.

## The personal information we collect and how we collect it

### When you sign up to our newsletter email list or for a free download or similar offering

If you sign up to our newsletter email list, or if you wish to access a free download or similar offering, we will collect your email address. Sometimes we may also ask for your name and where you're from.

### When you enrol in a course

When you enrol in a course, we will ask you to enter some or all of your name, address, email address, and phone number.

If you need to pay a fee to enrol in a course, you will also be asked to provide your credit card information. However, the online course platform we use for our course (Mastermind.com) processes the payment. We do not obtain or store your credit card information.

### When you interact with us in relation to a course or other service

You may also choose to provide additional personal information to us in connection with a course you wish to take or are taking or in relation to another service we provide. For example, you might provide additional information about yourself when asking questions about a course or when providing feedback on a course or this site.

### Children and our services

If you are a child under 13 years of age, you are not permitted to provide any personal information to us and you are not permitted to enrol in any of our courses. If you are 13 years old or older, you must also be old enough to consent to the processing of your personal information in the country where you live before providing any personal information to us. If we find that we hold information about any child under the applicable age referred to in this paragraph, we will delete it.

## Why we collect personal information

### Newsletter email list and free downloads or similar offerings

If you sign up to our newsletter email list, we will use your email address for the purpose of sending you news items of general interest and/or commercial messages about our courses, other services we may offer, and related matters.

If you sign up for a free download or similar offering (**Free Offer**), we will use your email address to provide you with the Free Offer or communicate with you in connection with the Free Offer.

If, when requesting a Free Offer, you agree to be added to our newsletter email list, we will add you to that list, and in that context we will use your email address for the purpose of sending you news items of general interest and/or commercial messages about our courses, other services we may offer, and related matters.

You can unsubscribe from our newsletter email list at any time by contacting us or clicking the unsubscribe link in a relevant email you receive.

### **Course enrolment**

When you enrol in a course, we collect the personal information described above to enable us to identify you, to enrol you in the course, to administer the course, to answer any questions you may have, and to contact you in relation to the course and your compliance with our terms of use. We may also email you about other courses and services we offer. You can unsubscribe from our newsletter email list at any time by contacting us or clicking the unsubscribe link in a relevant email you receive.

### **Interactions in relation to a course or other service**

If you provide other personal information when interacting with us in relation to a course or other service, we will only use that personal information in connection with the purposes for which you are providing it.

### **No sale or other distribution of your personal information**

We do not, and never will, sell any of your personal information to any individual or organisation or any other kind of entity.

## **Basis for using / processing personal information**

### **Free downloads or similar offerings**

The basis for our using your personal information to communicate with you in connection with any Free Offer you request is your consent.

### **Use of email addresses in email list and for commercial messages**

If we add your email address to our email list and send commercial or other messages to you as a member of that list, the basis for our doing so is your consent, in that when we collected your email address you indicated that you agreed to our adding your email address to our email list and using it in accordance with this privacy statement. You can unsubscribe from our email list at any time.

### **Use of personal information provided on course enrolment**

The bases for our using or processing the personal information you provided when enrolling for a course are:

- our legitimate interests in obtaining the information to provide you with access to your selected course(s) (relevant to use/processing conditions set by UK and EU law and any other country with privacy laws modelled on the GDPR);
- consent, in that when you provided us with the information, you consented (expressly or impliedly) to our using it as set out in this privacy statement (relevant to use/processing conditions set by UK and EU law, Canadian law, and any other country with privacy laws modelled on the GDPR or that, like Canadian law, are consent-based); and
- our using the information in accordance with the purposes notified to you at the point of

collection (relevant to use/processing conditions set by New Zealand and Australian law, and any other country with privacy laws that permit use of non-sensitive information in accordance with a purpose notified at the point of collection).

To avoid doubt, our referring above to the laws of various countries does not mean we accept they all apply to us. Rather, our goal is to act in a manner that is consistent with international privacy laws and therefore in a manner that is universally acceptable to our customers.

## Who will hold the personal information

We will hold your personal information. It will also be stored by the online course platform we use (Mastermind.com). If you are signed up to our email list, your email address will also be held on our behalf by the company that manages our email lists (MailChimp).

## Who will see it and where it will be sent

Your personal information will be viewable by us. We are based in New Zealand and New Zealand has an adequacy decision from the European Commission, meaning its privacy law provides an adequate level of protection.

The information you provide when enrolling for a course, or creating an account to do so, may also be viewable by the provider of the online course platform we use (Mastermind.com). They will handle it in accordance with their own [privacy statement](#). So far as we are concerned, it will not be viewable by anyone else and we will not share it with anyone else unless required by law to do so.

We do not intend to transfer personal information about customers in the EU and UK to a country (**third country**) beyond EU member states and the UK, other than to New Zealand as described above and through our use of other service providers (**Processors**) we use to provide our courses and services that are based in a third country.

All Processors we use are listed below. Processors outside of the EU either have data protection addenda (or similar documents) in place that contain a version of the European Union's standard contractual clauses for overseas transfers (**SCCs**), or are based in countries in respect of which the European Commission has granted an adequacy decision (meaning the country's laws have an adequate level of data protection), as follows:

Processor	Role	Personal information transferred	Location	EU adequacy decision or appropriate safeguards (if not in EU)
Mastermind.com	Online course platform	Customers' enrollment information	United States	<a href="#">Data Protection Addendum</a> incorporating Standard Contractual Clauses
MailChimp	Email list provider	Email addresses	United States	<a href="#">Data Protection Addendum</a> with Standard Contractual Clauses

Copies of any adequacy decision or other safeguards referred to above are available on request.

## Choice

You have a choice as to whether to provide any personal information to us. You can choose not to if you wish. However, if you do not provide the information we ask for, we will not be able to enrol you for or provide you with the course or other service for which we are requesting that information.

## Cookies

Cookies are small text files that are placed in your browser by the websites you visit. They are widely used to help users navigate websites efficiently, to perform certain functions on the sites and/or to provide site owners with information about how their sites are used.

We use the online platform Mastermind.com to provide our course and MailChimp to manage our email list. Those services may set their own cookies and use similar technologies and they may also use third party services that do likewise. To view details of cookies that Mastermind.com sets, see their cookies policy or privacy statement. You can also use a tool like cookieserve at <https://www.cookieserve.com/> to check the cookies (first party and third party) that are set when you use the Mastermind.com platform.

When you interact with an email that MailChimp sends at our request, MailChimp collects some information automatically about your device and your interaction with the email (and it uses cookies and other tracking technologies to collect some of this information). You can find further information about this in the 'Privacy for Contact' section of MailChimp's [Privacy Policy](#).

You can also remove or block cookies (by using settings in your browser). Doing so may affect your use of some elements of the site.

## How long we'll keep your personal information

We will keep your personal information for as long as we require it to provide our course-related services to you and to promote our services to you, after which we will securely delete it. You may, however, ask us to delete your personal information at any time. If you ask us to delete your personal information while you are taking a course, you may not be able to complete that course and so we suggest you not ask us to delete your personal information until a course is complete and you no longer wish to have access to it.

## 'Do not track'

Some country or state laws require those who collect personal information online to indicate how they respond to the so-called 'do not track' browser option. We do not support that option.

## Your rights

You have the following rights:

**Right to know:** You have the right to know what we collect and what we do with your personal information. What we collect and do are described in this privacy statement. You may also ask us at any time. We will only use your information for another purpose or share it with others in a manner not described in this statement if permitted or required by law to do so.

**Right to access and request correction:** You have the right to access and to request correction of the personal information we hold about you.

**Right to withdraw consent:** Where we are processing your personal information with your consent, you may withdraw that consent at any time. Withdrawing consent may affect your ability to continue using our services and may result in account closure.

**Right to request deletion:** You may ask us to delete the personal information about you that we hold. Unless a legal exception or prohibition on doing so applies, we will comply with your request.

**Right to request restriction of processing:** You can ask us to restrict the processing of your personal information for the reasons set out in the GDPR.

**Right to object to processing:** In certain situations specified in the GDPR, you may object to the processing of your personal information.

**Right to data portability:** You have the right to receive your personal information in portable form.

If you wish to exercise any of these rights, please contact us:

Privacy Officer  
Online Courses and Legal Stuff  
richard@besthancock.com

## Complaints

If you are concerned about our handling of your personal information or wish to make a complaint to us, please contact us at the address above.

You may also complain about our handling of your personal information to the [Privacy Commissioner](#) of New Zealand or, where applicable, to the relevant supervisory authority in your country that has jurisdiction (if it does) over our handling of your personal information (if any).

## Changes to this privacy statement

If we make any changes to this privacy statement, we will post the updated version to this site. Depending on the nature of the changes, we may also make a notification on the site and/or notify you by email.