

# Privacy Policy

## 1. Introduction

The PhD Place Ltd (Registered in England & Wales, Company Number 14300924) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#).

## 2. Important Information and Who we Are

### WHO WE ARE

We are an online community for doctoral researchers, owned by The PhD Place Ltd. The PhD Place Ltd is the controller and responsible for your personal data (collectively referred to as "The PhD Place", "we", "us" or "our").

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 3. The data we collect about you

This personal information is required to provide products and/or services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products and/or services to you.

We may collect, store, and use the following kinds of personal data:

### 3.1 Technical Data

If you visit ThePhDPlace.com, our website will collect certain information about your computer and about your visits to and use of this website, such as your IP address, login data (where applicable), browser type and version, time zone setting and geographical location, browser plug in types and version, operating system and platform, and other technology on the devices you use to access this website.

### 3.2 Identity Data

This includes first name, last name, username or similar identifier, title, and gender and/or gender pronouns.

### 3.3 Profile and Contact Data

This includes your username and password, email address, university, short biography, professional online presence (such as your LinkedIn profile), a photograph of you, your article and its associated data, category selection and featured tags, your signature (for video release forms), date of discontinuation (for video release forms), and any other information that you choose to send to us.

### 3.4 Transaction Data

Includes details about payments to and from you and other details of products and services you have purchased from us. All data relating to financial transactions are handled by third-party financial institutions. No credit card data or any other information in this respect is held by The PhD Place Ltd.

### 3.5 Usage Data

Includes information about how you use our website, products and services, such as referral source, length of visit and number of page views.

### 3.6 Marketing and Communications Data

Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you wish to update any of this information, we ask that you contact us using our [contact form](#) in the first instance.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not require or collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we require or actively collect any information about criminal convictions and offences. If you provide or volunteer any Special Categories of Personal Data or criminal conviction or offence data about yourself in the course of submitting any article to The PhD Place and/or otherwise using The PhD Place, that is entirely at your sole discretion, responsibility and risk and, by doing so, you thereby provide your explicit consent to the Special Categories of Personal Data and/or criminal conviction and offence data in question being stored and used for the particular purposes for which such personal data was provided or volunteered by you and for the derivation of Aggregated Data. If we ever actively collect any Special Categories of Personal Data or criminal conviction or offence data about you, we will not process any such personal data without your explicit consent before doing so.

By submitting an article to The PhD Place, all contributors consent to their article being edited by an employee or volunteer engaged by the service. We invite editors from all over the world to volunteer with us, although these are primarily based in the UK (from which The PhD Place operates). The content and wording of any article submitted to us is reviewed and edited to ensure our guidelines are met. We do not employ other organisations to do this. When you submit any article to The PhD Place, you consent to all of its content and wording being stored, reviewed and edited for such purposes and in this way.

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of our website in order to provide services or products to you, and you fail to provide that data when requested, we may not be able to provide you with goods or services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 4. How your personal information is collected:

We use different methods to collect data from and about you including through:

#### Direct Interactions

You may give us your Identity or Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Purchase a product or service through our website;
- Submit data through one of our forms;
- Sign up to one of our writing groups;
- Request marketing to be sent to you;
- Enter a competition; or
- Give us some feedback.

## Automated technologies or interactions

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

## Third Parties or Publicly Available Sources

We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
  - (a) analytics providers such as Google Analytics based inside and/or outside the UK;
  - (b) advertising networks such as Google AdSense based inside and/or outside the UK; and
  - (c) search information providers such as Google, Yahoo, and Bing based inside and/or outside] the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as online payments systems and banks based inside OR outside the UK.
- Identity and Contact Data from data brokers or aggregators such as marketing and ticket automation and email marketing platforms based inside and/or outside the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
- Personal data may also be collected from individuals' interactions and transactions on our social media platforms. This can include contact information, financial data related to purchases or payments made through social media platforms, and other identity and contact data that users voluntarily provide on their profiles.

# 5. How we use your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you and/or provide goods and services to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<u>What we use your personal information for</u>	<u>Lawful Basis and description</u>
To provide products and/or services to you	In order for us to fulfil a service or contract with you or take steps at your request before entering into a contract, i.e. providing author profiles, publishing your content on The PhD Place, publishing comments
To prevent and detect fraud against you or The PhD Place Ltd.	For our legitimate interests or the legitimate interests of a third party, i.e. to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity	For our legitimate interests or the legitimate interests of a third party, i.e. to minimise fraud that could be damaging for us and for you

Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with legal or regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or the legitimate interests of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or the legitimate interests of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or the legitimate interests of a third party, i.e. to protect trade secrets and other commercially valuable information. To comply with legal or regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or the legitimate interests of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or the legitimate interests of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you. To comply with legal or regulatory obligations
Updating (and enhancing) customer records	In order for us to fulfil a service or contract with you or take steps at your request before entering into a contract. For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with legal or regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with legal or regulatory obligations. For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services (and those of selected third parties where we have consent) to existing and former customers	For our legitimate interests or the legitimate interests of a third party, i.e. to promote our business to existing and former customers
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or the legitimate interests of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with legal or regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

We have determined, acting reasonably and considering the circumstances, that we are able to rely on legitimate interests as the lawful basis on which to process your personal information in certain circumstances (we have stated this above and set out our legitimate interests).

We consider that it is reasonable for us to process your information for the purposes of our legitimate interests outlined above as: (a) we process your information only so far as is necessary for such purpose; and (b) it can be reasonably expected for us to process your information in this way.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and/or services, including exclusive offers, promotions or new products/services.

You have the right to opt out of receiving promotional communications at any time by:

Using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## 6. Who we share your personal information with

We may share your personal information with third parties for the purposes set out in the table under the following section "PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA" such as:

- Third parties we use to help us run our business, e.g. marketing agencies, website hosts (WordPress, Elementor), website themes and plugins; more specifically in relation to our website, it is fully hosted on Elementor servers in Belgium. Elementor deploys a CDN (content delivery network) to serve end-users from the nearest point of presence. A CDN is a worldwide geographically distributed network of servers and data centres. Your information, including personal information, may be stored through Elementor's servers. By using the Service, you consent to Elementor's collection, disclosure, storage, and use of your personal information in accordance with Elementor's privacy policy available at <https://elementor.com/about/privacy/>
- Third parties we use to help deliver our products and/or services to you, e.g. payment service providers, fulfilment services, warehouses and delivery companies;
- Third parties selling products and/or services through our website;
- Third parties sponsoring us and/or advertising through our website;
- Third parties approved by you, [e.g. social media sites you choose to link your account to or third party payment providers;]
- Our bank(s);
- External auditors; and
- Law enforcement agencies and/or regulatory bodies;
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

You are responsible for keeping your password and user details confidential. We will not ask you for your password.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. International data transfers

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. We will transfer your personal data to EU member states and EEA countries on the basis that the United Kingdom deems EU member states and EEA countries to be adequate to allow for data flows from the United Kingdom. We will also only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers/#rules>.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. For further details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/>.

If you would like further information please contact (see 'How to contact us' below).

## 8. Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## 9. How long your personal information will be kept

Different retention periods apply for different types of personal information. We will keep your personal information while we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see "Your Rights" section below for further information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## 10. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information – in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information – in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain situations
To object	The right to object: At any time to your personal information being processed for direct marketing (including profiling); In certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

## NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

For further information on each of those rights, including the circumstances in which they apply, please contact us – see below 'How to contact us'.

If you would like to exercise any of those rights, please:

- email, call or write to us– see below: 'How to contact us'; and
- let us have enough information to identify you e.g. your full name, address and customer or matter reference number
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

# 11. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

# 12. Changes to this privacy policy

This privacy policy was published on June 23, 2023.

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# 13. Cookies

We use cookies on this website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://thephdplace.com/cookie-policy/>

# 14. Contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

E-mail: [contact@thephdplace.com](mailto:contact@thephdplace.com)

# The PhD Place

The PhD Place Ltd Is A Registered Limited Company In England & Wales, Number 14300924. C16, Ingenuity Centre, Triumph Road, University Of Nottingham Innovation Park, Nottingham, United Kingdom, NG 2TU

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