

Privacy Policy — Web Users

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Operated by: Nudge Education Ltd · **Version:** Aug 2026 · **Owner:** Data Protection Officer

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Date of next review: 6 December 2026

Version: v2.3 Classification: Public Author: Data Protection Lead

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 Lead (operations): 07958 440 937 (business mobile) · privacy@nudgeeducation.co.uk

This notice is written under the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 (together, "data protection laws").

Young people visiting our sites Some of our sites are read by young people aged 11–18. We design them in line with the ICO's Age Appropriate Design Code: we do not profile young visitors, we do not use their information for marketing, and non-essential cookies stay off unless accepted.

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.) Our analytics tools (Google Analytics and Squarespace analytics) capture IP addresses; we minimise and mask these where possible.

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 us electronically at any time at **privacy@nudgeeducation.co.uk** or **talk2nudge@nudgeeducation.co.uk**. In line with the Data (Use and Access) Act 2025 we will acknowledge a data protection complaint within 30 days and respond without undue delay. You can also complain to the ICO (ico.org.uk; 0303 123 1113) at any time — though we'd welcome the chance to resolve concerns first.

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.

Cookies on the NEO site family (added August 2026) Our NEO sites (nudgeeducation.online and its subdomains, including curriculum, courses, next, support and policies.nudgeeducation.online) use a single optional analytics tool: Google Analytics 4, loaded through Google Tag Manager. Nothing is set until you choose “Accept analytics” on the cookie banner; if you choose “No thanks”, no analytics load at all.

- Cookies set (only after consent): `_ga` and `_ga_*` (Google Analytics; used to distinguish visitors; expire after up to 2 years).
- Your choice itself is stored in your browser (local storage, key `neo-consent`) so we do not ask again on every visit. This is strictly necessary and contains no personal data.

- No advertising, marketing or social-media cookies are used on the NEO sites, and we do not profile visitors. This reflects the Age Appropriate Design Code approach set out above: non-essential cookies stay off unless accepted.
- Processor: Google LLC. Usage data may be processed outside the UK; the safeguards described under “International transfers” apply.
- To change or withdraw your choice at any time, use the “Cookie choices” link in the site footer, or clear your browser’s site data for the site.

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, update the “Last updated” date and, where appropriate, notify you by email.

Contact Email privacy@nudgeeducation.co.uk

Document control

Field	Value
Version	Aug 2026
Owner	Data Protection Officer
Status	live
Source file	1. All Company/Privacy Policy Web Users - Dec 2025.pdf
Change note (Aug 2026)	v2.3: NEO site family analytics (consent-first GA4 via Tag Manager) and Cookie choices withdrawal link — signed off August 2026