

XR2TRAIN

Privacy Policy

xr2train.com | Ikigaico Ltd | Last Updated: March 2026

This Privacy Policy explains how Ikigaico Ltd ("we", "us", "our") collects, uses, stores, and protects your personal data when you visit www.xr2train.com or purchase our training services. We are committed to protecting your privacy in accordance with the UK Data Protection Act 2018 and the UK GDPR.

Data Controller: Ikigaico Ltd

Company No.: 15719171

VAT No.: 469 4667 32

Registered Address: 5 Canon Court, Institute Street, Bolton, BL1 1PZ, United Kingdom

Data Protection Contact: privacy@xr2train.com

1. Who We Are

Ikigaico Ltd is the data controller for personal data collected through www.xr2train.com. xr2train and ikigai•xr are brand marks of Ikigaico Ltd. If you have any questions about how we use your personal data, please contact us at privacy@xr2train.com.

2. What Personal Data We Collect

2.1 Data You Provide Directly

- Account registration: Name, email address, and password.
- Purchase data: Billing name, address, and payment transaction references (we do not store card details — these are processed by Stripe).
- Profile information: Job title, organisation, and training preferences.
- Communications: Content of emails or messages you send to us.

2.2 Data Collected Automatically

- Technical data: IP address, browser type and version, device type, operating system.
- Usage data: Pages visited, courses accessed, Tokens redeemed, session duration, and interaction logs within the Platform.
- Cookies and tracking technologies: As described in our Cookie Policy.

2.3 VR/XR Usage Data

When you use our XR/VR training content, we may collect performance and completion data, including assessment scores, time-on-task, and training progress. This data is used to provide you with completion records and certificates, and to improve course design.

3. Legal Basis for Processing

- Contract performance: Processing necessary to provide you with the services you have purchased (e.g. account management, Token redemption, course access).
- Legitimate interests: Operating and improving the Platform, preventing fraud, ensuring security, and communicating service updates.
- Consent: Where you have opted in to marketing communications or analytics cookies.

- Legal obligation: Compliance with applicable tax, accounting, and regulatory requirements.

4. How We Use Your Personal Data

- To create and manage your account.
- To process payments and fulfil your orders via Stripe.
- To provide access to purchased training content.
- To send transactional communications (order confirmations, receipts, technical notices).
- To send marketing communications, where you have consented.
- To personalise and improve your experience on the Platform.
- To comply with our legal and regulatory obligations, including VAT and HMRC reporting.

5. Sharing Your Personal Data

We do not sell your personal data. We may share it with:

- Stripe Payments UK Ltd: To process payments securely. Stripe is a PCI DSS Level 1 certified data processor.
- Vercel Inc.: Our website hosting and deployment provider (Vercel may process data via US-based servers under Standard Contractual Clauses).
- Analytics providers: Such as Google Analytics, in anonymised or pseudonymised form.
- Email service providers: To deliver transactional and marketing emails.
- Legal and regulatory authorities: Where required by law, court order, or to protect our rights.
- Business transfers: In the event of a merger, acquisition, or sale of the business, your data may be transferred to the new entity, subject to the same protections as set out in this Policy.

All third-party processors are bound by appropriate Data Processing Agreements and are required to process data only on our documented instructions.

6. International Transfers

Some of our service providers (including Vercel and certain analytics tools) may process data outside the UK. Where this occurs, we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the ICO or transfers to countries with an adequacy decision.

7. Data Retention

- Account data: Retained for the duration of your account, plus 6 years after closure to comply with HMRC record-keeping requirements.
- Purchase and billing records: Retained for 7 years for VAT and accounting purposes.
- Training completion records: Retained for 3 years, unless you request earlier deletion (subject to any legal obligations).
- Marketing data: Retained until you withdraw consent or unsubscribe.

When data is no longer required, it is securely deleted or anonymised.

8. Your Rights

Under UK GDPR, you have the following rights in respect of your personal data:

- Right to be informed: To receive clear information about how your data is used (this Policy).
- Right of access: To request a copy of the personal data we hold about you.
- Right to rectification: To have inaccurate or incomplete data corrected.
- Right to erasure: To request deletion of your data in certain circumstances.

- Right to restrict processing: To request that we limit how we use your data.
- Right to data portability: To receive your data in a structured, machine-readable format.
- Right to object: To object to processing based on legitimate interests or for direct marketing.
- Rights related to automated decision-making: We do not make solely automated decisions that have a significant effect on you.

To exercise any of these rights, please contact us at privacy@xr2train.com. We will respond within one calendar month. You may also lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.

9. Security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or alteration. These include TLS encryption in transit, access controls, and regular security reviews. Our Platform is hosted on Vercel's infrastructure and payments are handled by Stripe's PCI DSS-compliant systems.

Despite these measures, no internet transmission is 100% secure. You are responsible for keeping your account credentials confidential.

10. Changes to This Policy

We may update this Privacy Policy from time to time. We will notify you of material changes by email or via a prominent notice on the Platform. The date of the most recent update is shown at the top of this document.

11. Contact Us

Email: privacy@xr2train.com

Post: Ikigaico Ltd, 5 Canon Court, Institute Street, Bolton, BL1 1PZ, United Kingdom

If you are not satisfied with our response, you have the right to complain to the ICO: www.ico.org.uk/concerns