

TRAINING STRATEGIES Ltd
PRIVACY AND DATA PROTECTION POLICY

Background

Training Strategies Ltd.(TSL) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers, subscribers and website visitors and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law. This policy explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier’. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. These individuals are sometimes referred to as “data subjects”.

What are your rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Policy should tell you everything you need to know, but you can always contact us to find out more.
- The right to access the personal data we hold about you.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any and all of your personal data that we have.

- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

Sharing your information

To deliver our services, TSL may need to share certain information about you with:

- the Education and Skills Funding Agency (ESFA) and the European Social Fund (ESF), both of whom fund many of the qualifications that we deliver
- Ofsted, who monitor standards in Education
- Awarding bodies for the qualifications that we deliver to our clients

These organisations will also usually become controllers of your data and will therefore have their own privacy notices.

Storing and retaining your information

Your information will be stored either electronically or in paper-based form.

Information derived from contracts with our customers and other information about you is stored electronically either locally at our head office or securely at a data centre based in the European Economic Area ("EEA"). Those data centres may use IT support based outside of the EEA and, as a consequence, data transfers outside the EEA are possible. Where data is transferred for support purposes it is protected by the EU approved model clauses.

We won't keep your personal data for any longer than is necessary in respect of the reason(s) for which it was first collected.

If you are a "Learner" with TSL, we retain personal information for the period required by the ESFA or other funding partners. This is usually for a minimum of six years (unless otherwise requested by them).

If you are an employer, or other contact:

- Where you have opted in to receive communications from us, we shall retain the details you have provided for so long as you remain an active subscriber (i.e. you have not unsubscribed);

Where you have contacted us to enquire about our products and services, we shall retain your contact details for a minimum period of 12 months, as we are mindful that you may not necessarily make an immediate decision as to whether you may make a purchase.

Use of Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website. It also allows us to improve our website.

A 'Cookie' is a small piece of information that we store on your computer. Our system will issue cookies to your computer when you access the site. We use the following cookies

- **Strictly necessary cookies;** These are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- **Analytical/performance cookies;** These 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.
- **Functional Cookies;** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including "strictly necessary" cookies) you may not be able to access all or parts of our website.

You can remove cookies from your computer at any time by going into the settings in your browser and deleting the browsing history and cookies stored. The exact location of this setting will depend on your browser of choice.

Safeguarding

If we are concerned about the welfare of a student then we are under a duty to consider what, if any, action should be taken. Depending on the circumstances, action that we

take can include us sharing information with appropriate external agencies such as the police, local authorities or under the 'Prevent' initiative, which is part of the UK Government's anti-terrorism strategy.

Internally, the sensitive personal information that may be disclosed in relation to student welfare issues is only ever shared with our safeguarding lead and deputies.

Individual Rights

You have a right of access to personal data that TSL may hold about you.

Personal data must be processed in line with individuals' rights, including the right to:

- request a copy of their personal data;
- request that their inaccurate personal data is corrected;
- request that their personal data is deleted and destroyed when causing damage or distress; and
- opt out of receiving electronic communications from TSL.

Your right to access, rectify, erase and restrict your data

If you would like to see the data that we hold about you, let us know and we will share it with you for no charge and to the extent allowed by law. If there are errors in the data, let us know and we will rectify it. We will also erase or restrict your data if requested but this may mean that we need to discontinue your training, as we have an obligation to share personal data with government agencies, in order to fund your training.

If you are unhappy with how we use your data, wish to withdraw your consent or wish to rectify, erase or restrict your data

If you are unhappy with how we gather, use, share or store information about you, please contact us in writing at our Head Office: The Data Controller, Training Strategies Ltd. 22 Oriel Road, Bootle, Merseyside, L20 7DT. You can also email us at gdpr@trainingstrategies.co.uk. We will send a full response within no more than 28 days. If you are not satisfied with our response, you can contact the Information Commissioner's Office (www.ico.org.uk). TSL is registered as a data controller with the ICO under registration number Z2042719.

To withdraw your consent to the processing of your data or would like to rectify, erase or restrict your data simply contact us in writing at the address above or by email us at: gdpr@trainingstrategies.co.uk.

