



General Data Protection Regulation (GDPR) Policy Statement

This policy statement sets out our organisations approach to the safe collation, handling, processing, storage and deletion of personally identifiable information. The policy is to be considered alongside the Data Protection policy and IT user policies.

Our organisation is registered with the Information Commissioners Office under the requirements of the Data Protection Act 1998

Our organisation is required to perform a number of data collection, processing, storage and sharing tasks in order to provide its products and services and to meet its contractual obligations.

Our organisation is responsible for both the processing and control of personally identifiable information. This policy statement and supporting strategy sets out how we will comply with GDPR regulations.

Information you provide to us

You may provide us with information by filling forms, visiting our website(s) or by corresponding with us by phone, e-mail, live-chat or otherwise. This includes information you provide when you register for our training and work placement services.

The personal information you provide may include your name, address, e-mail address, phone number, unique learner number, financial and credit/debit card information and other information about yourself including your ethnicity, household circumstances and learning needs. By providing us with this information, you expressly consent to our use of your personal information in accordance with this privacy policy.

Information we collect

- (a) Our services: we may collect personally identifiable information about you, such as your full name, phone number and email address, residential address and or employers address. When you use our services, including our website(s) and online learning platforms we may collect usage information
- (b) We do not send any promotional emails, however, we may send you product/service emails related to the service we provide you. If you no longer wish to receive these emails, you may opt out of them by responding appropriately to the preference questions at the end of our communications.

How we share your information

- (a) Personally identifiable information: We will not rent or sell your personally identifiable information to others. We will share information



relating to your training course and or work placement with relevant parties including the Education and Skills Funding Service, Ofsted, your employer (or potential employer). The purpose in sharing your personally identifiable information will extend only to the provision of our services, payment for those services and management of services and quality control of services.

- (b) We may store personal information in locations outside of our direct control i.e. on remote servers or document storage facilities.
- (c) Non-personally identifiable information: We may share non-personally identifiable information (such as anonymous online usage data, referring exit pages and URL's) with appointed third parties in order to improve services and user experience. Non-personally identifiable data may be stored indefinitely.

Storage and Processing

Your information collected maybe stored and processed in the United Kingdom, European Union, United States or any other country in which our service providers maintain facilities.

The EU Data Protection Directive 95/46/EC applies to all information held in connection with an individuals funded learning. The directive requires all linked personally identifiable information be held within the geographical confines of EU territory. <https://www.dataprotection.ie/docs/EU-Directive-95-46-EC-Chapter-1/92.htm>

How we protect your information

For E.U. clients. We comply with the EU Data Protection Directive 95/46/EC framework regarding the use and retention of personal data from European Union member state countries and Switzerland.

How we use the information we collect

Operations

We use the information we collect (other than client data) to operate, maintain, enhance and provide all features of our advice, guidance and training services. We use the contact data you provide us to respond to comments and questions and provide support to the users of our services.

Improvements

We use the information you provide to understand and analyse the quality and impact of the service we provide and to make improvements, develop new products and services and improve functionality for service users.

Communications

We may use a client's or service user's email address or other information to contact that client or service user for administrative purposes such as



customer service, training delivery and the provision of further information, advice and guidance. We may from time to time contact clients or service users with updates on promotions and events relating to our products and services. You have the ability to opt-out of receiving any promotional communications as described below.

Access, Correction, Deletion

We respect your privacy rights and provide you with reasonable access to the personal data that you may have provided through the use of our services. If you wish to access or amend any other personal data we hold about you, or to request that we delete any information about you, you may contact us as set out in the 'How to contact us' section below. At your request, subject to contractual compliance, we will delete reference to you or block your information in our database.

You may update or correct information held about you within your online learning portfolio at any time. Please note that any changes you make will be reflected in a reasonable period of time. We will retain all information about you for backups, archiving and the prevention of fraud and abuse.

You may decline to share certain personal data with us, in which case we may not be able to provide you some of our products and services.

Data Retention

We only retain the Personal Data collected from you for as long as the services we are providing require. Personal Data is retained for as long as we need it to fulfil the purposes for which we have collected it, unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our own contracts and agreements as follows;

- Billing information is retained for a period of 7 years in accordance with taxation laws
- Personal information relating to the provision of funded or subsidised learning is retained for 7 years in accordance with our own contracts.

Contact details for the purposes of deletion or correction

Crawley; Andrew Ayres andrew.ayres@rewardstraining.co.uk
Scotland; Alex Carruthers alex.carruthers@rewardstraining.com
Hove; Tracey Robertson tracey.robertson@lookfantastictraining.co.uk

Policy update

This policy was introduced on the 16th April 2018