

Privacy Statement

1. Introduction

Skill Step Training is committed to protecting your personal data. This policy explains how and why we use your personal data to make sure you remain informed and in control of your information.

Skill Step Training will ask its learners and client/customers or potential clients/customer learners to "opt-in" to receive information about our products, services and courses. This means you'll have the choice as to whether you want to receive these messages.

You can choose not to receive information or change how we contact you at any time. If you would like to, please let us know by:

Emailing: info@skillsteptraining.co.uk

Writing to us at our company address:

Skill Step Training
Alba House. 12A South Parade
Doncaster
DN1 2DY

Telephone: 01302 618760 (Mon to Fri: 9am-5.00pm Sat and Sun: Closed)

We will never sell your personal data. We may share personal data with other organisations who we work with to provide the service to you. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

Any questions you have about this policy or how we use your personal data should be sent to: <u>info@skillsteptraining.co.uk</u> or addressed to: The Data Protection Officer at the postal address given above.



2. About Us

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you) will be collected and used by Skill Step Training which is a private limited company with Company No: 12139213 and data security number CSN5563921.

For the purposes of data protection law, Skill Step Training will be the Data Controller.

3. What information do we collect?

3.1 Personal data you give to us

We collect data you give to us. For example:

- Personal details (name, date of birth, email, address, telephone, education details etc.) when you sign up to an apprenticeship agreement
- Data known as sensitive personal data (ethnicity, additional learning needs)
- Financial information (payment information such as credit/debit card or direct debit details.

3.2 Information created by your involvement with Skill Step Training

Your activities and involvement with Skill Step Training create additional personal data, for example, information about your education progress and qualifications.

We may analyse your personal data to build a profile which helps us decide which of our communications you might be interested in.

3.3 Information from other organisations



We sometimes receive personal data from other organisations, for example, where they have passed us information about people who are interested in our apprenticeships and training courses.

3.4 Social Media

We may work with external marketing agencies who provide information about people who have registered an interest in Skill Step Training courses and where they have given appropriate consent to be contacted.

3.5 Digital Marketing Service Providers

We may appoint digital marketing agents to conduct business to business marketing activity on our behalf and such activity may result in the compliant processing of personal information. This includes contacting individuals within organisations which may be interested in the services Skill Step Training has to offer.

3.6 Sensitive personal data

We may collect or store data known as sensitive personal data (such as information relating to additional learning needs or ethnicity). We will do this where we have been asked to do so by official Government agencies or where the information is needed for the assessment of additional educational support needs.

If we do this, we'll take extra care to ensure your personal data is protected.

3.7 Accidents or incidents

If an accident or incident occurs in one of our training centres or involving one of our employees then we'll keep a record of this (which may include personal data and sensitive personal data).

4. How do we use personal information?

We only ever use your personal data with your consent, or where it is necessary:

• To enter into, or perform, a contract with you



- To comply with a legal duty
- To protect your vital interests; this means, for example, keeping you safe from harm
- For our own (or a third party's) lawful interests, provided your rights are not affected

We will only use your information for the purpose or purposes it was collected for.

4.1 Administration

We use personal data for administrative purposes. This includes:

- Receiving payment (e.g. direct debits or payment card details)
- Maintaining databases of our learners and their educational progress
- Performing our obligations under apprenticeship or training contracts
- Helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

4.2 Marketing

We use personal data to communicate with people and to promote Skill Step Training. This includes keeping you up to date with our news and offerings.

4.3 Research and Analysis

We may carry out research and analysis on the data we hold to understand behaviour and responses and identify patterns and trends.

We evaluate, categorise and profile personal data to tailor services and communications we send out (including targeted advertising) and to prevent unwanted material from being sent to you.

4.4 Anonymised data

We may combine sets of personal data and change the personal data so that it can no longer be linked to any particular person. This information may then be used to



monitor Skill Step Training's business performance or to identify trends or patterns within our existing learner database.

4.5 Disclosing and sharing data

We will never sell your personal data. If you have opted-in to marketing, we may contact you with information about further opportunities in education.

We may share personal data with other organisations who provide us with services. For example, we may use an IT supplier to process personal data. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

4.6 Marketing

Skill Step Training will ask its learners and contacts to "opt-in" for marketing communications. This means you'll have the choice as to whether you want to receive these messages.

4.7 Young people

As an education provider, we regularly process the personal data relating to young people who enquire about courses and training opportunities.

5. How do we protect personal data?

We use a variety of physical and technical methods to keep your data safe and to prevent unauthorised access or sharing of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information using both physical and electronic means.

Our employees receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.



5.1 Payment security

All electronic forms that request financial data will use secure web technology to encrypt the data between your web browsers and our computers.

If you use a credit card we will pass your credit card details securely to our payment provider. Skill Step Training complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

6. Storage of personal data

6.1 Where Skill Step Training information is stored

Skill Step Training operations are based in the UK and we store our data primarily within the European Economic Area (EEA).

Skill Step Training will occasionally use services outside of the EEA to process personal data, but only where the service ensures an adequate level of protection and where appropriate safeguards have been provided.

6.2 How long does Skill Step Training Keep information for?

We will only use and store information for as long as it is needed for the purposes it was collected for. How long we keep information depends on the information and what it's used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

7. How do we ensure that you remain in control of your data?



We want to ensure you remain in control of your personal data and that you understand your legal rights which include:

- The right to ask and be told whether or not we have your personal data and, if we do to obtain a copy of the personal data we hold (this is known as a subject access request)
- The right to have your data deleted (though this will not apply where it is necessary for us to continue to use the data to administer your training course or apprenticeship.
- The right to have incorrect data amended
- The right to object to your data being used for marketing purposes or profiling

Please note that there are some exceptions to the rights above and, although we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights please write to or email our Data Protection Officer at the addresses given in section 1.

We can provide you with a subject access form template which includes guidance on how to make your request and will help us respond more quickly. Please contact us for a copy of this.

8. Complaints

You can complain to Skill Step Training directly by contacting our Data Protection Officer using the contact details set out above. If you would like to make a complaint which does not directly relate to your data protection and privacy rights please see Skill Step Training's complaints policy.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk.



9. Cookies and links to other sites

9.1 Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to the customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way give us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

9.2 Links to other websites

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the web page).

If an external website requests personal information from you, the information you provide will not be covered by the Skill Step Training privacy policy. We suggest



you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with Skill Step Training.

10. Changes to this privacy policy

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.



Revision Status

Revision	Date	Amendment	Content	Mandated
			Owner	Ву
1.0	06/08/20	Issued for use	K Hodgson	K Hodgson
2.0	01/08/21	Annual Review- minor	H Kirkham	K Hodgson
		changes to reflect structure		
		changes		

Approval

Approved by:	Katie Hodgson	
Job title:	Managing Director	
Signature:	(Holdson	
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