



trainwithpremier.com

Train With Premier Privacy Policy

| Train With Premier Privacy Policy | |
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| Version No | 1 |
| Operational from | 21 st January 2021 |
| Policy prepared by | Andy Heald – Head of Quality & Education |
| Policy approved by | TWP Board |
| Policy approved | 21 st January 2021 |
| Review date | 21 st January 2022 (unless prompted by legislation etc) |

Privacy Policy

Section 01: Policy Scope

Train with Premier is a reputable education provider offering professional development programmes and regulated qualifications in active leisure, learning and wellbeing. Train with Premier is recognised as a centre for the delivery of vocational qualifications in accordance with a legally established third party agreement with a number of regulated awarding organisations. The awarding organisations that we are affiliated with are regulated in England by the Office of Qualifications and Examinations Regulation (Ofqual).

This policy is required to be complied with by all stakeholders affiliated with our organisation. Any breach to this policy must be reported as a complaint in accordance with the procedures outlined in the Train with Premier Compliments, Comments and Complaints Policy.

Privacy policy defined

A privacy policy is a statement or a legal document (in privacy law) that discloses some or all of the ways a party gathers, uses, discloses, and manages a customer or client's data

The nominated Integrity Officer maintains oversight for this policy, manages associated processes and all associated records. Any enquiries in the deployment of this policy should be directed to Integrity Officer in the first instance:

| | |
|-------------------------|-----------------------------|
| Integrity Officer Name | Mekila Kelly |
| Integrity Officer email | mkelly@trainwithpremier.com |

Section 2: Policy Statement

Personal information

Train With Premier is committed to protecting personal information and will not use or share information with anyone except as described in this privacy policy. This policy supports Train With Premier's need to collect information and the rights of any individual, to privacy. It ensures that we can collect personal information necessary to support our services and function while also recognising the right of the individuals to have their information handled in a way that they would expect and protect the privacy of their personal information.

We may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal information may include, but is not limited to:

- your name
- nationality
- date of birth
- email address
- postal address
- telephone number
- relevant protected characteristics
- relevant health and medical information
- unique learner number [if this is appropriate].

Section 2: Procedure

Data collection

We collect and process some of the following types of information from you which may include, but is not limited to:

- Information that you provide when completing forms, this includes information provided at the time of recruitment, registering onto training events, subscribing to our services, posting material or requesting further information or services.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we or our partners use for research purposes.
- Details of all actions that you carry out through our website and of the provision of services to you.
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to our site and the resources that you access.

Sharing or transferring your data

We limit access to your personal data to those who have a genuine business need to know it, but will need to disclose your personal information to selected third parties in order to achieve the purposes set out in this Notice. These parties may include (but are not limited to):

- Transcend Awards Limited
- 1st4sport Qualifications
- organisational workforce
- regulatory bodies such as Ofqual

We will need to disclose your personal information to awarding organisations for the following reasons:

- register you as a learner onto a training event
- issue assessment results, claim certification and maintain records
- register you as a staff or workforce member to meet requirements
- to carry out reviews, complaints or appeals
- to provide further information related to our products and services
- to provide further information related to awarding organisation products and services (where you consent to do so)
- to provide further information related to partner products and services (where you consent to do so)
- to comply with regulatory and legal requirements

Data security

Train With Premier take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way, for the duration of your use of our services. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the website, therefore any transmission remains at your own risk. Once we have received your information, we will use strict procedures and security features in order to prevent unauthorised access.

Data rights of access

The Data Protection Act 2018 outlines various rights that a data subject has with regard to their personal data. Please see a summary below:

- The “Right to be informed”: individuals must be made aware of how and why their personal data is collected.
- The “Right of access”: individuals can request access to copies of their personal data in order to verify that it is being processed in a lawful and correct way
- The “Right to rectification”: individuals can request that inaccurate personal data is corrected (or completed if it is incomplete)
- The “Right to erasure”: under certain circumstances, an individual can request that their personal data is deleted (e.g. if they wish to unsubscribe from receiving marketing communications and also have their contact details completely deleted from our systems. This would be possible provided there was no legitimate ongoing reason for us to retain their details)
- The “Right to restrict process”: under certain circumstances an individual can request the suppression of their personal data (e.g. allowing us to continue holding their data, but pausing all processing of that data whilst they seek to verify that it is accurate and / or being processed lawfully)
- The “Right to portability”: under certain circumstances, an individual can request that their personal data is electronically transferred from us to another data controller
- The “Right to object”: under certain circumstances, an individual can object to the way in which their data is being processed (for example, if they believe that we do not have legitimate grounds for collecting and processing certain information about them). If the objection is upheld, we are required to stop processing that information.

Section 4: Policy and procedure review

Systematic review

Train With Premier have in place a standardised and systematic monitoring process to ensure the continued relevance and accuracy of this policy. Any data collected with relates to the implementation of this policy will be used to inform any changes to the policy, approaches to the management of the organisation and to the delivery of products and services where this is required.

This policy was approved by the Board on 21 October 2020 and will be reviewed by the Board by 21 October 2022 unless there is a change in legislation changes or supporting data identifies that a review is required before this date.

Section 5: Policy document version control

This document is subject to version control. All changes will be tracked here and confirmed as an updated version.

| Version | Publication | Details |
|------------|-------------|--------------------|
| Version 01 | 21/10/2020 | First publication. |