

# Privacy Policy

This policy applies to the Prestige Assessment Training and Qualification Ltd (PrATiQ™ The Centre of Development) in England. PrATiQ™ needs to keep certain information about its employees, students, voluntary members and other users for academic and administrative purposes. It also needs to process information so that legal obligations to funding bodies and government are complied with.

We are committed to ensuring that your privacy is protected, and we strictly adhere to the provisions of the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and will be compliant with the EU General Data Protection Regulation (GDPR), which comes into force on the 25th May 2018.

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

For further information on these rights you can contact the ICO via one of the options on their website <https://ico.org.uk/global/contact-us/>

Our Privacy Policy, together with our terms and conditions, sets out how we collect personal information from you, or how you provide us with personal information, which will be processed by us.

## **Information we collect**

We may collect your personal information when you: participate in, access or sign up to any of our services, activities or online content – such as newsletters, competitions, live chats, phone or email us, vote, donate money to PrATiQ™, reserve a place at an event, ask for more information, enrol or apply for one of our courses, make purchase or create an account on our website or on the phone.

Please note that we may need additional, sometimes sensitive, personal information from you such as ethnic origin, health, racial origin, political opinions, religious beliefs or sexual orientation (e.g. if you're applying to join one of our courses or applying for a job) This type of sensitive personal information is also known as 'special categories of personal data'. The processing of special categories of personal data is only permitted in certain situations such as providing health and social care during your studies. However, in these circumstances, we'll explain further why we're collecting the information and how we'll use it and always obtain your explicit consent to process specific categories of personal data...

## What types of personal data do we collect?

- name, ethnic origin, gender preference and date of birth
- contact details including postal address, email and phone
- your communication preferences
- household situation
- employment information,
- prior education level,
- household status & residency status
- state benefits where relevant
- disability/learning difficulty information, and support information where relevant
- records of academic assessment and outcomes

PrATiQ™ collects information about how you use its websites and other PrATiQ™ online content, and the device(s) you use to access these services. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the web. For more information, please see the section on ‘how does PrATiQ™ use cookies.

Your personal information will then be used by us (including our: employees; agents; subcontractors; members of our group; resellers; trusted partners and awarding or accrediting organisations) to provide you with the services you ordered and from time to time to communicate with you on any matter relating to the provision of the services.

If you would prefer not to receive any of the above-mentioned information (or if you only want to receive certain information) from us please let us know by sending an email to [praticlearning@gmail.com](mailto:praticlearning@gmail.com) You have the right to ask us not to process your personal data for marketing purposes. [We will not share, sell or distribute any of the information you provide to us without your prior consent, unless required to do so by law.

## How will PrATiQ™ use the personal information it collects about me?

By providing PrATiQ™ with your personal information it will be stored, used and shared by us for any of the following purposes:

- To register you on to one of our courses and give you access to the course materials.
- To comply with funding and audit requirements.
- To identify and prevent fraud.
- To enhance the security of our network and information systems.
- To provide you with information about our courses; application tips; funding advice; and other information that may be relevant to your interests.
- To provide you with invitations to relevant events and reminders or joining details for those events to which you register.
- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our students/customers.
- To better understand how people, interact with our websites.
- To provide postal communications which we think will be of interest to you.

- To determine the effectiveness of promotional campaigns and advertising.
- For the direct marketing of PrATiQ™ products and services.
- To issue directed funding appeals and verify large donations.

We may ask for consent to send you marketing communications about our products and services. You'll be able to opt out of these communications at any point by selecting the "opt out" option on the registration form or alternatively the 'unsubscribe' option at the bottom of each email we send you.

Whenever processing data for these purposes, we'll ensure we always keep your rights and interests in high regard and take account of them. You have the right to object to this processing if you wish. See section under 'What are my rights' for more details. Please bear in mind that if you object, this may affect our ability to carry out the tasks, mentioned above, for your benefit.

We'll notify you before using your personal information for any other means.

## **Retention of Data**

We will hold and process your personal information on our systems only for the purpose for which the data was originally collected, or as long as is set out in any relevant contract you hold with PrATiQ™. If you enrol on a course with PrATiQ™ we'll retain your personal information for 7 years in line with our responsibilities to record and report on this information for government bodies, awarding organisations.

If in the future we intend to process your personal data for a purpose other than that which we collected it for, we will provide you with information on that purpose.

## **STAFF RESPONSIBILITIES**

This policy will not be incorporated into contracts of employment, but it is a condition of employment that employees will abide by the rules and policies made by PrATiQ™ from time to time. Any failures to follow this policy can therefore result in disciplinary proceedings.

Any member of staff, who considers that the policy has not been followed in respect of personal data about themselves, should raise the matter with the Data Controller. If raising the issue with the Data Controller does not resolve it the matter should be raised as a formal grievance.

### **Specific Staff Responsibilities**

All staff, including sessional staff such as tutors, have a responsibility for:

- Checking that any information that they provide to PrATiQ™ in connection with their employment is accurate and up to date.
- Informing PrATiQ™ of any changes to information, which they have provided, i.e. changes of address, bank details, etc.
- Informing PrATiQ™ of any errors or changes in staff information.

When staff hold or process information about students, colleagues or other data subjects (for example, students' course work, references to other academic institutions, or details of personal circumstances), they should comply with the following Data Protection Guidelines:

All staffs are responsible for ensuring that:

- Any personal data, which they hold, is kept securely, for example:
  - kept in a locked filing cabinet; or
  - in a locked drawer;
  - if it is computerised, be encrypted and password protected;
- Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

Any unauthorised disclosure will be investigated as a disciplinary matter and may be considered gross misconduct in some cases. It may also result in a personal liability for the individual staff member, as unauthorised disclosure can be a criminal offence.

### **Staff Use of Personal Data Off-Site, On Home Computers or at Remote Sites**

Employees processing personal data off-site should ensure they take reasonable precautions to prevent the data from being accessed, disclosed or destroyed as a result of any act or omission on their part. They should notify the Data Controller immediately in the event of any loss or theft.

## **Legal basis for processing your information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only

- a) where we have your consent to do so,
- b) where we need the personal information to perform a contract with you, or
- c) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we'll make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not.

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we'll make clear to you at the relevant time what those legitimate interests are.

If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

## **ACCURACY OF DATA**

Updating is required only "where necessary" on the basis that, provided; PrATiQ™ has taken reasonable steps to ensure accuracy (e.g. taking up references), data held is presumed accurate at the time it was collated.

All employees, students and voluntary members should be made aware of the importance of providing PrATiQ™ with notice of any change in personal circumstances.

Where Individual Student Records (ISRs) are kept, students will be made aware of who to contact in order to access the data for the purposes of ensuring that the data is up to date and accurate. Employees, students and voluntary members will be entitled to correct any details although in some cases PrATiQ™ may require documentary evidence before affecting the correction, e.g. by seeking examination or qualification certificates for amending qualification details.

## **THIRD PARTIES**

Any personal data which PrATiQ™ receives and processes in relation to third parties, such as visitors, suppliers, former students and voluntary members, employers, enquirers and other individuals on mailing lists etc. will be obtained lawfully and fairly and dealt with in accordance with the principles and conditions of the Act.

- fairly and lawfully processed;
- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- not kept longer than necessary;
- processed in accordance with the data subject's rights;
- secure;
- not transferred to countries without adequate protection.

Employees should obtain explicit consent from third party data subjects to process such personal data for the purposes expressed and should ensure that there is a mechanism for data subjects to gain access to data about themselves, to prevent the processing of such data for the purposes of direct marketing and to object to the disclosure of such data.

## **Marketing**

### **Will I be contacted for marketing preferences?**

We use automated decision-making processes and profiling to process your personal data in relation to marketing purposes.

We offer regular emails to let you know about our courses, events and news. As well as any alerts relating to courses you have booked or shown an interest in. We may also invite you to take part in surveys about our products and services or issues affecting PrATiQ™, some of which we are legally required to do.

PrATiQ™ may personalise the message content based on any information you provide to us and your use of our platforms.

You can update your communications preferences and stop receiving any future emails at any time by following the convenient links located at the bottom of our emails. Requests submitted in this manner are processed and effective immediately.

If you believe you have received unwanted, unsolicited emails sent by or purporting to be from PrATiQ™, please forward a copy of that email with your comments to [data.protection.pratiqlearning@gmail.com](mailto:data.protection.pratiqlearning@gmail.com) for review.

Occasionally, we may contract a third party to communicate on our behalf to the third-party's contacts. We don't collect your email address or contact information from this third party, and we don't have access to their mailing list.

Depending on the nature of the third-party mailing, we may, in order to comply with applicable laws, provide the third party with a suppression list of our contacts to exclude from their list. The third party doesn't have permission to keep or market to our contacts on this list, or to use it in any way other than as a suppression list for a mailing they're providing on our behalf.

We may contact you via post to let you know about our courses, events and news. PrATiQ™ may personalise the message content based on any information you provide to us. You will only be contacted by post if your marketing preferences state you are happy for us to do so.

PrATiQ™ may contact you by phone, either by a call or by SMS, to keep you updated about courses you have shown an interest in or asked to receive alerts for (e.g.: using our waiting lists functions). We will only contact you this way if stated in your marketing preferences.

## **Our use of cookies**

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive.

Each website can send its own cookie to your web browser if your browser's preferences allow it. We can only store a cookie on your device if you allow it. If you continue without changing your settings, we'll assume you're happy to receive all cookies on the PrATiQ™ website.

On PrATiQ™ websites, cookies record information about your online preferences and allow us to tailor our websites to your interests.

During the course of any visit to a PrATiQ™ website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

## **How we use cookies?**

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience. For example, allowing us to analyse site usage and spot potential technical or user experience issues. It also helps us recognise when you're signed in to your PrATiQ™ account and to provide a more personalised experience.

If you don't want us to use cookies when you use our website, you can adjust your internet browser settings not to accept cookies. Your web browser's help function should tell you how to do this. Alternatively, you can find information about how to do this for all the commonly used internet browsers on the website: <http://www.aboutcookies.org/default.aspx>. This website will also explain how you can delete cookies which are already stored on your device.

Please note that if you set your computer to not accept cookies, there may be certain features/areas on our website that you may not be able to use. It may be necessary to have cookies enabled in order to purchase or access online courses and materials.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

## **SECURITY MEASURES**

This policy is designed to fulfil statutory requirements and to prevent unauthorised disclosure of/or access to personal data. The following security measures will therefore be required in respect of the processing of any personal data.

Access to personal data on staff, students and voluntary members is restricted to those members of staff who have a legitimate need to access such data in accordance with the PrATiQ™ notification to the Information Commissioner.

Members of staff authorised to access personal data, will be allowed to do so, only in so far as they have a legitimate need and only for the purposes recorded in the notification.

All persons processing data and individuals requesting access to personal data in accordance with this policy must have familiarised themselves with this policy.

All personal data will be stored in such a way that access is only permitted by authorised staff, including storage in filing cabinets, computers and other storage systems. Any act or omission which leads to unauthorised access or disclosure could lead to disciplinary action.

Personal data should be transferred under conditions of security commensurate with the anticipated risks and appropriate to the type of data held.

Personal data held electronically should be appropriately backed up and stored securely to avoid incurring liability to individuals who may suffer damage or distress as a result of the loss or destruction of their personal data.

Any disposal of personal data will be conducted in a secure way, normally by shredding. All computer equipment or media to be sold or scrapped must have had all personal data completely destroyed, by re-formatting, overwriting or degaussing (a method of erasing data held on magnetic media).

### **Transfer of Data Outside the UK**

PrATiQ™ does not transfer personal data outside the UK without the express consent of the data subject.

## **RIGHTS TO ACCESS INFORMATION**

Staff, students, voluntary members and other users of PrATiQ™ has the right to access any personal data that is being kept about them either on computer or in manual files. Any person who wishes to exercise this right should submit a written request to the PrATiQ™ Office address.

You have the right to request a copy of the personal information we hold about you, except where releasing that information would breach another person's privacy or where an exemption applies.

You may request in writing that PrATiQ™ disclose details of data which it holds about you and the purpose for which such data is held. A 'Subject Access Request Form' will be supplied upon request. We'll need your passport or driver's licence for proof of identity.

If we do hold information about you, we'll:

- give you a description of the categories of personal data;
- tell you why we are holding/processing it;
- tell you who it has and or might be disclosed to; and
- let you have a copy of the information in an intelligible form.

If we hold incorrect information about you, you can ask us to correct any mistakes by contacting the Data Protection Officer. We'll use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

Please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, and email: [pratiqlearning@gmail.com](mailto:pratiqlearning@gmail.com)

### **Right of rectification:**

You have the right to update or amend the information we hold about you if it is incorrect.

You can do this by updating your profile online or by contacting the Data Protection Officer at [pratiqlearning@gmail.com](mailto:pratiqlearning@gmail.com)

### **Right of erasure:**

Ask us to remove your personal information from our records. If you request that your data be erased without undue delay, we'll securely dispose of it if one of the following grounds applies:

- the data is no longer necessary for the purposes it was collected;
- you withdraw your consent and there is no other legal ground for processing the data;
- you object to the processing of data for direct marketing purposes; and
- we have unlawfully processed your personal data.

Please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, email: [pratiqlearning@gmail.com](mailto:pratiqlearning@gmail.com)

### **Right to restrict processing:**

You have the right to stop or limit processing of your personal data. When processing is stopped, we're permitted to store the personal data but not to further process it.

If you request that your data processing be processed in limited circumstances, we'll store the information we still need to process your data within these limited parameters and a note detailing the request to limit processing to ensure we don't contact you again in the future.

Please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, email: [pratiqlearning@gmail.com](mailto:pratiqlearning@gmail.com)

### **Right to data portability:**

You have the right to obtain a copy of your personal data provided that the processing is based on your consent and it is carried out by automated means.

You also have the right to ask us to transmit the data to another controller.

If you want to request a copy of your personal data then please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, email: [pratiqlearning@gmail.com](mailto:pratiqlearning@gmail.com)

### **Right to withdraw consent:**

You have a right to object by withdrawing your consent at any time, although this will not affect the lawfulness of any processing carried out before the withdrawal. Nor will it affect any processing undertaken on other lawful grounds.

### **Right to make a complaint to the supervisory authority:**

You have the right to make a complaint to the Information Commissioner's Office (ICO):

Wycliffe House

Water Lane

Wilmslow

Cheshire, SK9 5AF

United Kingdom

Tel: +44 (0)303 123 1113 (local rate)

Web: [ico.org.uk](http://ico.org.uk)

### **Changes to the PrATiQ™ privacy policy**

This Privacy Policy may be updated so you may wish to check it each time you submit personal information to PrATiQ™. The date of the most recent revisions will appear on this page. If you don't agree to these changes, please refrain from using PrATiQ™ websites to submit personal information to us.

If material changes are made to the Privacy Policy, for instance affecting how we'd like to use your personal information, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

**Contacting PrATiQ™ about it's privacy policy**

If you have any questions or comments about this Privacy Policy, please contact:

Data Protection Officer, email: [pratiqllearning@gmail.com](mailto:pratiqllearning@gmail.com)