

Train4Academy Ltd Privacy policy

Our websites; www.train4academy.co.uk, www.train4food.co.uk, www.t4lms.co.uk and www.t4ms.co.uk (our 'Sites'), are owned and operated by Train4Academy Limited, also referred to as "we", "our", and/or "us". We are a limited company and registered in England and Wales under company number 04622965 and have our registered office and trading address at First Floor Phoenix House, Grovehill Road, Beverley, East Riding of Yorkshire, HU17 0JG.

We are committed to protecting and respecting your privacy.

This policy (together with our **Terms and Conditions of Website Use** which can be viewed at <https://www.train4academy.co.uk/legal/ts-and-cs-of-website-use.pdf> and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting any of our sites you are accepting and consenting to the practices described in this policy which relate to the Cookies section below. If you or your employer enters into a contract with us and we are provided with your personal data further to that agreement we will treat your personal data in accordance with the terms of that contract and this Privacy Policy.

For the purpose of the Data Protection Act 1998 (the **Act**), and as of 25 May 2018, the General Data Protection Regulation ("GDPR") we are the data controller where we control the purposes for which we process your personal information. Generally we will be the data processor as you or your employer will have asked us to provide services to you/your employer and we process your personal data further to our provision of such services.

Our nominated representative if you require any information about our privacy policy or the way in which we handle your personal data is Alec Lyne. See Contact Details below.

Company Name: Train4Academy Limited

Postal Address: First Floor, Phoenix House, Grovehill Road, Beverley, HU17 0JG

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our Sites or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to; use our Sites, you subscribe to our services, search for a course, place an order on our Sites, participate in discussion boards or other social media functions on our Sites, enter a competition, promotion or survey, and when you report a problem with our Sites. The information you give us may include your name, address, email address and phone number and/or financial and credit card information.

- **Information we collect about you.** With regard to each of your visits to our Sites we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide or from your employer if you are signed up to our courses or your employer supplies us with goods or services. Such data will be combined with data collected from all of our Sites.

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 and also allows us to improve our Sites. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](https://www.train4academy.co.uk/terms-conditions.asp) which can be viewed at <https://www.train4academy.co.uk/terms-conditions.asp> }

USES MADE OF YOUR PERSONAL DATA

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you (or your employer) and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (email or SMS) or by telephone with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you do not want us to do this you can unsubscribe at any time by using the unsubscribe button at the bottom of the email from us or by contacting us (see Contact Information below). If you are a new customer, we will contact you by electronic means or telephone only if you have consented to this;

- to notify you about changes to our service;
- to ensure that content from our Sites is presented in the most effective manner for you and for your computer;
- detect and prevent fraud.
- **Information we collect about you.** We will use this information:
 - to administer our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Sites to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our Sites safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you about goods or services that may interest you.
- **Information we receive from other sources.** We may combine information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

THIRD PARTY PROCESSORS

Train4Academy uses sub-processors to carry out certain activities on our behalf. All our sub-processors are Data Protection Act 2018 and GDPR compliant. The below is a list of our sub-processors and what services they provide:

Catalyst 2 Hosting

Provides our main infrastructure including web hosting, email delivery, data storage and file storage.

Location: UK

XERO

Accounting software which is used to process invoices and complete other business-related activities.

Location: USA

Tawk.to

Provides an app hosted on our websites which allows live chat function for website visitors.

Location: USA

From time to time our business needs may change and we may reduce our use of sub-processors. Additionally, we may add a sub-processor if we believe that doing so will allow us to improve the service we deliver. We will periodically update this policy to reflect additions and removals to our list of sub-processors.

DISCLOSURE OF YOUR INFORMATION

We will only share your identifiable personal information with the following selected third parties:

- awarding bodies for the purposes of audit and accreditation; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our **Terms and Conditions of Website Use** which can be viewed on our website at <https://www.train4academy.co.uk/legal/ts-and-cs-of-website-use.pdf> or our **Terms and Conditions of Supply of Services** which can be viewed on our website at <https://www.train4academy.co.uk/legal/ts-and-cs-of-supply-of-services.pdf> and other agreements; or
- to protect the rights, property, or safety of Train4Academy Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction (such as Paypal and Xero).

We will only share anonymised information about you with other third parties.

MARKETING AND EMAIL NEWSLETTER

We use any information submitted to us by you to provide you with further information by email and about the products and services we offer which you have requested and/or which may be of interest to you where you are or have been a customer or have completed a Certificate in the last 3.5 years. You can choose to unsubscribe at any point by clicking on the link at the bottom of the email.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 us or our Sites by email; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

DATA PROCESSED OUTSIDE OF THE EEA

Some of our data processing activities are carried out by sub-processors who are located outside of the EEA. This is permitted under the Data Protection Act 2018 when subject to appropriate safeguards. The sub-processors Train4Academy use are all GDPR Compliant and are subject to standard contractual arrangements.

YOUR RIGHTS and our CONTACT DETAILS

You have the right to ask us not to process your personal data for different purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to restrict and object to such processing by checking certain boxes on the forms we use to collect your data or by contacting us to let us know.

You also have the right to; access information held about you, rectification, erasure and data portability. To exercise any of your rights please contact us via one of the methods listed below.

Contact us via email to enquiries@train4academy.co.uk, via telephone on 01482 861040 or via post to our address – Train4Academy Ltd, First Floor, Phoenix House, Grovehill Road, Beverley, HU17 0JG.

EXTERNAL LINKS

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

If you have any concerns or complaints about how we use your personal data we hope you will alert us to those directly. In any event you are entitled to complain to the Information Commissioners Office (ICO) which is the supervisory authority in the UK. Their contact details and the procedure can be found at www.ico.gov.uk.

RETENTION OF YOUR PERSONAL DATA

We will keep your personal data securely for the following periods of time unless you ask us (in writing) to delete it sooner and in each case subject to any legal obligation to keep the information for a longer period of time.

- Where you have been a customer of ours we will hold your contact personal data for the period of the agreement plus 3.5 years from the date of your last transaction with us, for the purposes of marketing, as training is usually reviewed every 3 years. Such processing of your personal data is on the basis of our contract with you and our legitimate business interest.

- Personal data held in training records will be held until you ask us to delete such information unless we have an obligation to your employer, who is our client, or another third party (such as a certification authority) to keep it for longer or until we are asked to transfer it to our client on the basis of contractual obligations and our legitimate business interest.
- Where the training record is not linked to an organisation or employer all personal data will be deleted 3.5 years after the last course was completed with the exception of your name, date of birth (if provided) and email address (if provided). This information is retained on the basis of contractual obligations and legitimate business interest.
- We hold different types of financial transactional information for different periods of time depending on the content and our legal obligations under legislation and further to contracts with third parties such as card companies.
- We will keep personal data which needs to be kept for HMRC purposes for 7 years from the end of any agreement with you/your employer.
- VAT MOSS data is kept for 10 years.

We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed via email to enquiries@train4academy.co.uk, via telephone on 01482 861040 or via post to our address – Train4Academy Ltd, First Floor, Phoenix House, Grovehill Road, Beverley, HU17 0JG.

Train4 Academy Limited
May 2018