



NULOGIC TRAINING LTD
PRIVACY POLICY
Version 1.1

This policy was updated: **August 2019**

This policy will be reviewed: **August 2020**

Statutory policy? **Yes**

CONTENTS

CLAUSES	SUBJECT	PAGE NO.
1.	INTRODUCTION AND TERMS.....	1
2.	WHO WE ARE AND HOW TO CONTACT US	1
3.	YOUR RIGHTS	1
4.	THE DATA WE COLLECT ABOUT YOU.....	2
5.	THE DATA WE COLLECT ABOUT YOUR LEARNERS	2
6.	HOW YOUR DATA WILL BE USED	2
7.	THIRD PARTIES.....	2
8.	WHERE YOUR DATA IS HELD	3
9.	LEGITIMATE INTEREST & MARKETING	3
10.	APPLICATIONS TO WORK FOR US.....	3
11.	DATA RETENTION.....	3
12.	DATA DELETION.....	3
13.	DATA CORRECTION.....	3
14.	DATA INSPECTION.....	4
15.	CHANGES	4
16.	COMPLAINTS.....	4

1. INTRODUCTION AND TERMS

Nulogic Training Ltd (“We “or “us”) are committed to protecting and respecting your personal data and privacy. This privacy policy relates to our use of any personal data we collect from you from any of our services. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data; including the Data Protection Act 1998 and 2018 (DPA), and The General Data Protection Regulation 2016 (GDPR) together, and with other subsequent laws “**Data Protection Laws**”.

2. WHO WE ARE AND HOW TO CONTACT US

- 2.1 For the purpose of the Data Protection Laws, the data controller is Nulogic Training Ltd, registered company number 10813962. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

FAO: Privacy Officer
Nulogic Training Ltd
1 Victoria Square
Birmingham
B1 1BD

Email: contact@nulogictraining.co.uk

Telephone: 01214 812773 and ask to speak to the Privacy Officer

3. YOUR RIGHTS

Under the Data Protection Laws your rights are:

- 3.1 **To be informed** – We must make available this privacy notice with the emphasis on transparency over how we process your data.
- 3.2 **Access** – You are entitled to find out what details we may hold about you and why.
- 3.3 **Rectification** – We are obliged to correct or update your details.
- 3.4 **Erasure** – This is also known as the request to be forgotten.
- 3.5 **Restrict processing** – You have the right to ‘block’ or suppress the processing by us of your personal data.
- 3.6 **Data portability** – You have the right to obtain and reuse your personal data that you have provided to us.
- 3.7 **Object** – You have the right to object to us processing your data in relation to direct marketing and or profiling.
- 3.8 **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or profiling.

4. THE DATA WE COLLECT ABOUT YOU

4.1 We collect and process Personal Data. Typically, the Personal Data we collect and process will include name, address and email address but we may collect and/or process other Personal Data from time to time. It also may include IP address and cookies of your visit to websites.

4.2 We only collect data from you directly.

5. THE DATA WE COLLECT ABOUT YOUR LEARNERS

5.1 We collect and process Personal Data about your learners. Typically, the Personal Data we collect and process about your learners will include name, gender and date of birth but we may collect and/or process other Personal Data from time to time.

5.2 The Personal Data that belongs to the learner will be used for the purpose of internal reporting and for learner registration with Awarding Organisations.

5.3 The Personal Data that belongs to the learner will not be shared publicly. This includes personal data (i.e. first name **and** surname) combined with results obtained from completing a qualification with an Awarding Organisation.

5.4 Any images that are to be obtained containing a learner will only be done so with the prior consent of the parents/guardians of the learner in the form of a Waiver Form.

6. HOW YOUR DATA WILL BE USED

6.1 We use information held about you to:

6.1.1 ensure that content from our site is presented in the most effective manner for you and for your devices;

6.1.2 provide you with information, products or services that you request from us or which we feel may interest you (where you have consented to be contacted for such purposes or by Legitimate Interest);

6.1.3 carry out our obligations arising from any contracts entered into between you and us;

6.1.4 allow you to participate in interactive features of our service when you choose to do so, e.g. asking a question through our website.

6.1.5 carry out necessary maintenance to our infrastructure; and

6.1.6 notify you about changes to our services

6.2 We also embrace the use of social media and may wish to process any comments made public by you.

7. THIRD PARTIES

7.1 We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

7.2 Please see below the list which sets out the categories of recipients of personal data.

SERVICE PROVIDED
<i>IT Support Services</i>
<i>Email Provider</i>
<i>Accountants</i>
<i>Cloud Based Storage System</i>
<i>Solicitors</i>

7.3 In addition, third parties may provide us with Personal Data and they should only do so where the law allows them to.

8. WHERE YOUR DATA IS HELD

Any digital data that contains your Personal data is stored within the UK.

9. LEGITIMATE INTEREST & MARKETING

9.1 Where we use Legitimate Interests, we will record our decision and our method on making this decision.

9.2 If you are an existing contact or customer we will only contact you by postal and electronic means (e-mail) with information about services or goods which you have previously purchased from us or enquired about. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by post or electronic means only if you have consented to this. You can choose to not receive these types of communication by contacting us.

10. APPLICATIONS TO WORK FOR US

If you apply to work for us (directly or indirectly) in any role (including volunteers) we may receive data about you from third parties. In addition, we will keep the details of your application and any additional information provided to us by you or others during your application so that we can keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in this policy.

11. DATA RETENTION

Our data retention policy is dictated by the Data Protection Laws and is available for inspection by submitting a written request using the contact details provided in this policy.

12. DATA DELETION

Under Data Protection Laws you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and must be submitted in writing to the contact details provided in this policy.

13. DATA CORRECTION

We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

14. **DATA INSPECTION**

- 14.1 We strive to be as open as we can be in terms of giving people access to their personal data. Individuals can find out if we hold any of their personal data by making a formal request under the Data Protection Laws. Such requests must be in writing to the contact details provided in this policy. If we do hold your personal data we will respond in writing within one calendar month of your request (where that request was submitted in accordance with this policy).
- 14.2 The information we supply will:
- 14.2.1 confirm that your data is being processed;
 - 14.2.2 verify the lawfulness and the purpose of the processing;
 - 14.2.3 confirm the categories of personal data being processed;
 - 14.2.4 confirm the type of recipient to whom the personal data have been or will be disclosed; and
 - 14.2.5 let you have a copy of the data in an intelligible form.
- 14.3 Please note that you may need to provide identification in order to prove who you are to access your data.
- 14.4 If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
- 14.5 In the instance that we do not hold information about you we will also confirm this in writing at the earliest opportunity.

15. **CHANGES**

We keep our privacy policy under regular review and you should check back regularly to ensure you are aware of changes to it. We may display this notice to you from time to time to help ensure you are aware of its contents.

16. **COMPLAINTS**

You have the right to complain about the processing of your personal data. Please contact us using the details provided above. If you are still unsatisfied you have the right to complain to the [Information Commissioners Office](#).

COOKIES

Our site 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 site. By browsing or using the services we provide on the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the memory of your device. Cookies contain information that is transferred to your device's memory.

WE USE THE FOLLOWING COOKIES:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Cookie	Name	Purpose	Further Information
<u>EXAMPLE</u> Google Analytics	__ga	Used to distinguish users by Google Analytics.	Expires 2 years from set/update.
	__dc_gtm	Used to help identify the visitors by either age, gender, or interests by DoubleClick - Google Tag Manager.	Expires 24 hours from set/update.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You may block cookies by activating the setting on your browser that allows you to refuse the storage of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.