

# PRIVACY POLICY

Last updated: **01/06/2024**

The Teacher Trainer Ltd would hereafter be referred to as 'TTT' in this document.

## Scope of the policy

This policy is provided for TTT customers, including learners and staff members who are using or delivering the courses or qualifications TTT offer.

## Location of the policy

This policy is available for all staff members, third parties and learners to access. The most up to date version of the policy is available on our website [www.theteachertrainer.co.uk](http://www.theteachertrainer.co.uk).

## Communication of the policy

It is important that TTT staff (involved in the management, delivery, assessment and quality assurance of nationally recognised qualifications) and learners undertaking our qualifications, are fully aware of the contents of the policy. It is a requirement that staff at TTT access, read and understand the policy during their induction.

## Review of the policy

TTT will review the policy annually as part of our self-evaluation process and revise it as and when necessary. The review process includes analysis of monitoring data, consultation with and feedback from customers, learners, clients, staff and other stakeholders, changes in practices, actions required by Awarding Organisations or changes in legislation to determine the impact of the policy and any action required. Our review will ensure that our procedures continue to be consistent with the regulatory criteria and are applied properly and fairly in arriving at judgements.

## Statement of Principles

At TTT, we collect and process your personal data in order to make enrolment/admission decisions, to provide education and training and for administration, health, safety, welfare and security reasons as well as to comply with our legal obligations to the government of the UK. TTT is committed to protecting your personal data. This policy explains how and why we use your personal data to make sure you remain informed, how we use any information we collect about you, how you can tell us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy. We will not, without your written permission, transmit your personal data outside the UK.

## Collection of Information – Your consent

TTT will ask its learners or potential learners to “opt-in” to receive information about our products and courses. This means you will 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. TTT may collect personal information from you if you provide it voluntarily. You can always refuse to supply personal identification information, except that it may prevent you from engaging in certain site related activities. If you do provide personal information to use, we will assume that you have read this Privacy Policy and have consented to us using your personal information in the ways described in this Policy and at the point where you give us your personal information. If, after providing us with personal information, you later decide that you do not want us to use it for particular purposes, then please contact us by:

**Emailing:** [dataprotectionofficer@theteachertrainer.co.uk](mailto:dataprotectionofficer@theteachertrainer.co.uk)

**Writing to us at our company address:**

The Teacher Trainer Ltd, Regus House, Fairbourne Drive, Atterbury, Milton Keynes MK10 9RG

**Telephone:** 01908 488 683

(Monday to Friday: 9 am - 5.30 pm | Saturday and Sunday: Closed)

We do not store credit card details nor do we share customer details with any 3rd parties for a commercial gain. Your personal information may be used to inform any promotional information sent to you about third parties that are deemed to be relevant to your needs. 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. Unless we have your permission, or unless required to do so by law, we will never sell, distribute or lease any personal information to a third party.

**Questions**

Any questions you have about this policy or how we use your personal data should be sent to: [dataprotectionofficer@theteachertrainer.co.uk](mailto:dataprotectionofficer@theteachertrainer.co.uk) or addressed to: The Data Protection Officer at the postal address given above.

**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 TTT. We are a private limited company. We provide a range of teacher training, assessor training and IQA training courses. We specialise in delivering courses online and as a blended distance-learning option. We offer face-to-face classroom-based training as well for our corporate clients.

Our registered company number is 08540014 and we are located at Regus House, Fairbourne Drive, Atterbury, Milton Keynes MK10 9RG. We are registered with the Information Commissioner's Office in the UK and our ICO registration number is ZA018863. For the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), the data controller is TTT.

**What information do we collect?**

**Personal data you give to us**

We collect data you give to us. For example:

- If you contact us (via website, contact form, subscribing to our newsletter or fill out a form), we may keep a record of that correspondence.
- Personal details (name, date of birth, email ID, address, telephone number, mobile number, education details etc.) when you sign up to a course/qualification agreement
- Organisation Details (your organisation's name, your position, business address, office phone number, etc.)
- Data known as sensitive personal data (ethnicity, additional learning needs, etc.)
- Financial information (payment information such as credit/debit card or direct debit details).
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our website including, but not limited to, web server statistics, traffic data, location data and details of the web pages and resources that you access.

### **Information created by your involvement with TTT**

- Your activities and involvement with TTT 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.

### **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 qualifications and training courses.
- We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.
- We may also use other organisations to help us conduct research and analysis on personal data (and this can result in new personal data being created).

### **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 will take extra care to ensure your personal data is protected.

### **Accidents or incidents**

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

### **How do we use personal information? (Lawful basis for processing your data)**

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 carry out our obligations arising from any contracts entered into between you and us
  - 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.

### **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
- To allow you to access secure areas of our website (such as 'My Account') when you choose to do so
- Helping us respect your choices and preferences (e.g., if you ask not to receive marketing material, we will keep a record of this).

### **Marketing**

- To provide you with information about our 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 – basically to promote TTT. This includes keeping you up to date with our news and offerings.

### **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.

### **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 TTT's business performance or to identify trends or patterns within our existing learner database.

### **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.

### **Marketing**

- TTT will ask its learners and contacts to “opt-in” for marketing communications. This means you will have the choice as to whether you want to receive these messages.

### **Young people**

- All our existing courses, products or services are for people who are 19+ in age and so the chances of processing the personal data relating to young people are extremely rare. However, as an education provider, we may have to deal with young people who enquire about courses and training opportunities.

### **How do we protect personal data?**

- All information you provide to us is stored on our secure servers.
- We use appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our site.
- 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.
- Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. It is therefore at your own risk.
- Once we have received your information, we will use strict internal procedures and security features to try to prevent unauthorised access. We also keep your information confidential. The internal procedures of TTT cover the storage, access and disclosure of your information.

### **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. TTT Online payment or Card payment agents (e.g., PayPal or Stripe) comply with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

## Storage of personal data

### Where is our information stored?

- TTT's operations are based in the UK, and we store our data within the European Economic Area (EEA).
- However, our email servers or our Learning Management System (LMS) are based in the United States of America which is where the information related to emails or online courses may be stored.

### How long does TTT 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 is 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 will 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.

### When we might disclose your data to third parties

We may disclose your personal information to third parties in a very limited number of circumstances:

- Where we engage the business services of a third party to provide services directly to TTT and help us operate our business and the website or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission. These third parties are strictly prohibited from using your personal data for any other purposes.
- We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above. With regard to Ad Servers, we do not partner with or have special relationships with any ad server companies.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If TTT or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 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 of use and other agreements; or to protect the rights, property, or safety of TTT, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### How do we ensure that you remain in control of your data? (Your right to access)

The GDPR gives you the right to access information held about you. 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/corrected
- 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 [dataprotectionofficer@theteachertrainer.co.uk](mailto:dataprotectionofficer@theteachertrainer.co.uk). 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.

- Any access request is not subject to a fee unless the requests are unreasonable in which case a fee may be charged and will be disclosed at the time of request. A copy of the information held about you by us can be requested by writing to us at [dataprotectionofficer@theteachertrainer.co.uk](mailto:dataprotectionofficer@theteachertrainer.co.uk).

### Variations to the policy

- From time to time, we may use customer information for new, unanticipated uses that have not been previously disclosed in our privacy notice. If our information practices change at some time in the future we will post the policy changes to our website to notify you of these changes. For these new purposes, we will only use data collected from the time of the policy change forward. If you are concerned about how your information is being used, you should check back at our website periodically.
- Customers may prevent their information from being used for purposes other than those for which it was originally collected by emailing.
- If you feel that this website is not following its stated information policy, you may contact use by email or by phone.

### Complaints

- You can complain to TTT 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 TTT's complaints policy which is available on our website [www.theteachertrainer.co.uk](http://www.theteachertrainer.co.uk).
- 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 <https://ico.org.uk/>.

### Cookies and links to other sites

#### Our use of IP addresses and cookies

We may collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration and to analyse aggregate information. This is statistical data about our users' browsing actions and patterns and does not identify any individual(s).

For the same reason, we may obtain information about your general internet usage by using a cookie file. 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 web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.



Cookies enable us:

- To estimate our audience size and usage pattern
- To store information about your preferences, and so allow us to customise our website according to user needs
- To speed up your searches
- To recognize you when you return to our site

We 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 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 gives us access to your computer or any information about you, other than the data you choose to share with us.

By using the website of The Teacher Trainer Ltd, you consent to the usage of data captured by the use of cookies. 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. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. Declining cookies may prevent you from taking full advantage of the website.

### **The third-party tools we use:**

- Google Analytics:** Page views, source and time spent on website are part of the user website activities information we can see with this cookie. This information cannot be tracked back to any individuals as it is displayed as depersonalised numbers; this is in order to help protect your privacy whilst using our website. Using Google Analytics, we can take account of which content is popular, helping us to provide you with reading and viewing materials which you will enjoy and find useful in the future. We also use Google Analytics Remarketing cookies to display adverts on third party websites to our past site users, based on their past visits. The data we collect will only be used in accordance with our own Privacy Policy and [Google's Privacy Policy](#). Should you not wish for your website visits to be recorded by Google Analytics, you are able to opt-out with the addition of a browser add-on: [Google Analytics Opt-out Browser Add-on](#).
- Google Analytics Advertiser:** We use Google Analytics Advertiser features, which helps us to better understand site visitors, via anonymised data. This can include collecting information from:
  - Google Display Network Impression Reporting
  - DoubleClick Platform integrations
  - Google Analytics Demographics and Interest Reporting
  - Remarketing with Google Analytics

This information is collected via Google advertising cookies and anonymous identifiers, in addition to data collected through the standard Google Analytics implementation. It allows us to understand what type of users visit the site, which then allows us to improve the website's offerings for a better user experience.

- c) **Google AdWords:** We use Google AdWords to see which pages led to our users submitting contact forms to us, which allows us to create a more effective marketing campaigns and make better use of our paid search budget.
- d) **DoubleClick:** We use DoubleClick cookies and remarketing codes on our website to record user activity. The information we collect allows us to create targeted advertising in future work and across Google's network of partners.
- e) **Website Optimiser:** Our website optimiser uses cookies to remember your search history. The information collected is anonymous and not personally identifiable and allows us to generate more relevant results for your searches in the future.
- f) **Call Tracking:** We use Call Tracking to set dynamic phone numbers on our website. These help us identify how you found the website when you call us and allows us to identify the source that you used to find the website. It gives a better idea of our users' requirements and lets us tailor our advertising methods in the future. If you phone us, your call may be recorded for training and quality purposes.
- g) **Visitor Tracking:** We often record and monitor user's behaviour around a website to analyse how we can improve its performance.
- h) **Facebook:** The Teacher Trainer Ltd use technology on our website called 'Facebook Pixel'. This technology allows us to track visitors who are referred here, to our website, via the Facebook/Instagram/Messenger app, a page or an advert on Facebook/Instagram/Messenger. Whilst we will share information in relation to your visit to our website with Facebook, this does not include specific information about your own personal details. The information will be used by Facebook, on our behalf, to calculate the success of our advertisements. We also use Facebook Pixel to allow us to present adverts on and off Facebook. You can find out more about this on [Facebook's Data Policy](#) page, which details the information we share in accordance with their policy. [Click here](#) to alter the permissions for Facebook Conversion Tracking.

Please click [here](#) for more information regarding cookies and our use of them.

### **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 going to our 'Contact Us' page).

If an external website requests personal information from you, the information you provide will not be covered by TTT's 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 TTT.