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# PRIVACY POLICY

Last updated: **07/04/2026** | **The Teacher Trainer Ltd. would hereafter be referred to as TTT in this document.**

## 1. Scope and Communication

**Scope:** This policy applies to all TTT customers, including learners and staff involved in delivering or using TTT qualifications.

**Accessibility:** The policy is available to all stakeholders on the TTT website footer section.

**Staff Induction:** All staff involved in assessment, delivery and quality assurance must read and understand this policy during induction.

**Review:** This policy is reviewed annually and updated as necessary to reflect legislative or awarding organisation changes.

**2. About Us:** TTT is a private limited company specialising in online and blended teacher training, assessor training and IQA training.

- **Registration:** Company number 08540014
- **ICO Status:** We are registered with the Information Commissioner's Office (ICO) under registration number **ZA018863**
- **Data Controller:** For the purposes of the **UK Data Protection Act 2018** and the **UK GDPR**, TTT is the data controller
- **Contact:** Queries should be directed to our designated point of contact at [dataprotectionofficer@theteachertrainer.co.uk](mailto:dataprotectionofficer@theteachertrainer.co.uk)

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**3. Information Collection and Usage:** We collect and process personal data that you provide directly or that is created through your involvement with TTT.

- **Personal Details:** Name, date of birth, email address, telephone numbers and education history
- **Communication Channels:** We process data flowing through email, SMS, telephone, WhatsApp and our LMS for course coordination and support.
- **Sensitive Data:** We may collect learning needs data for providing educational support.
- **Third-Party AI Tools:** We use third-party AI software to support marking, feedback and quality assurance. Your data may be processed by these platforms under strict confidentiality agreements.

#### **4. Call Recording and Monitoring**

- **Purpose:** TTT records telephone calls (inbound and outbound) made via our communication systems (including Zoom Phone), for the purposes of staff training, quality assurance and maintaining an accurate record of verbal agreements or disputes.
- **Lawful Basis:** Our lawful basis for processing this data is **Legitimate Interests**. This allows us to monitor and improve our service standards while ensuring the safety of our staff and learners.
- **Data Shared With:** Call recordings are processed and stored using **Zoom Video Communications, Inc.**. As this is a US-based service, these transfers are protected by **Standard Contractual Clauses (SCCs)** to ensure a level of data protection equivalent to UK law.
- **Retention Period:** Call recordings are typically retained for a period of **24 months**, after which they are securely deleted. If a recording is required for an ongoing investigation, dispute or legal obligation, it may be retained for a longer period in line with our data retention schedule.

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- **Your Rights:** You have the right to object to being recorded. If you do not wish for a call to be recorded, you may request to continue the conversation via email or other non-recorded channels.

**5. Lawful Basis for Processing:** We only process data where a lawful basis exists under the **UK GDPR**:

- **Contractual Necessity:** To perform our obligations under your training contract
- **Legal Duty:** To comply with regulatory and legal requirements
- **Legitimate Interests:** For administrative purposes, including receiving payments and maintaining databases, provided your rights are not overridden
- **Consent:** For marketing communications, where you have explicitly opted in

**6. International Data Transfers:** While TTT operations are primarily based in the **UK**, certain services require data to be processed outside the UK.

- **US-Based Services:** Our email servers and Learning Management System (LMS) are hosted in the United States.
- **Safeguards:** To ensure your data remains protected when transferred to the USA, we utilise **Standard Contractual Clauses (SCCs)** or other approved UK GDPR safeguards to maintain a level of protection equivalent to UK law.

**7. Data Retention and Security:** We retain personal information only for as long as necessary to fulfil the purposes for which it was collected.

- **Financial Records:** Retained for 6 years to comply with UK tax law

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- **Assessment Records:** Retained for the duration specified by the relevant Awarding Organisation (1 to 3 years)
  - **Marketing Data:** Retained for until consent is withdrawn or after 2 years of inactivity
  - **Security:** All data is stored on secure servers. We use electronic and physical access controls and encrypt financial data during transmission.

**8. Your Legal Rights:** Under the **UK GDPR**, you have the following rights:

- **Access:** The right to request a copy of the data we hold about you (Subject Access Request)
- **Rectification:** The right to have incorrect data amended
- **Erasure:** The right to have data deleted, provided it is no longer required for course administration
- **Objection:** The right to object to marketing or profiling

**9. Tracking and Cookies:** We use cookies to customise your experience and analyse web traffic.

- **Meta Pixel:** We use **Meta Pixel** (formerly Facebook Pixel) to track the effectiveness of our advertisements on Meta platforms.
- **Google Services:** We use **Google Tag Manager** and **Google Ads** (formerly DoubleClick/AdWords) for tracking marketing conversions and site performance.
- **Analytics:** Google Analytics is used to monitor popular content via depersonalised data.
- You can manage your cookie preferences at any time using the cookie consent tool on our website. Withdrawing consent will not affect the lawfulness of any processing already carried out.

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**10. Variations to this Policy:** We may update this policy to reflect new uses of customer information.

- Significant changes will be posted on our website
- You may prevent your information from being used for new purposes by emailing [admin@theteachertrainer.co.uk](mailto:admin@theteachertrainer.co.uk)
- If you feel this policy is not being followed, please contact us by email or phone

**11. Complaints:** If you believe your privacy rights have been infringed, you may complain directly to our Data Protection Officer. If you are dissatisfied with our response, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**. The ICO can be contacted at [www.ico.org.uk](http://www.ico.org.uk) or by telephone on **0303 123 1113**.

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**The Teacher Trainer Ltd.**

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