

# PRIVACY POLICY

Last updated: **22/05/2019**

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 and qualifications that '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 staff involved in the management, delivery, assessment and quality assurance of nationally recognised qualifications and learners undertaking these qualifications, are fully aware of the contents of the policy.

## Review of the policy

'TTT' will review and revise this policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. 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

'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.

## 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 would 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. 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 488 683/0203 714 7453  
(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. We will **never** sell your personal data. 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.

### 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, 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 a variety of physical and technical methods to keep your data safe and to prevent unauthorised access or sharing of your personal information.
- 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. For example, we may use a mailing house to email promotional materials such as our email newsletter. You may rest assured as any third parties are strictly prohibited from using your personal data for any other purposes.
- 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).

### 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.

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.

### **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.