

## 1. INTRODUCTION

Heart of England Training is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

We will **never** sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

### Questions?

Any questions you have in relation to this policy or how we use your personal data should be sent to [dpo@hoet.co.uk](mailto:dpo@hoet.co.uk) or addressed to The Data Protection Officer, Heart of England Training, Suite One, Eleven Arches House, Yates Avenue, Rugby, Warwickshire, CV21 1FD.

## 2. ABOUT US

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by Heart of England Training (A private training company registered in England no: **01029331** and data controller number **Z722519X**) For the purposes of data protection law, Heart of England Training will act as a data controller and processor.

## 3. WHAT INFORMATION WE COLLECT

### Personal data you provide

We collect data you provide to us. This includes information you give when enquiring online, or registering for our emails at events and registering as a learner or employer with us. For example:

- Personal details (name, date of birth, email, address, telephone etc.) when you apply or enquire about our courses or apprenticeships
- Financial information (payment information such as credit/debit card or direct debit details)
- Details of your training programme (such as start and end date, placement details, breaks in learning and employer contact details).
- Details of any medical conditions
- Next of Kin / emergency contact details

- **Information created by your involvement with Heart of England Training**

Your activities and involvement with us will result in personal data being created. This could include details of when you made an online application, signed up to a course or apprenticeship with us, made a payment for goods or services or made an enquiry.

### Information from third parties

We sometimes receive personal data about individuals from third parties. For example, if you have recently undertaken an initial assessment we will gather this information from BKSb. If you have applied for a vacancy with the National Apprenticeship Service we will collate your data from here in order to contact you about your application.

### **Sensitive personal data**

We collect and store sensitive personal data (such as information relating to health, sexual orientation and criminal records) about learners and staff. All our data is kept securely and stored for as long as required according to relevant guidelines and policies.

### **Accidents or incidents**

If an accident or incident occurs on our property, at one of our events or involving one of our staff or learners then we'll keep a record of this (which may include personal data and sensitive personal data).

## **3. HOW WE USE INFORMATION**

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for (or else for closely related purposes):

### **Marketing**

We use personal data to communicate with stakeholders (employers, prospective learners, salon clients) to promote our offering for each audience. This includes keeping you up to date with our news, events and industry updates. For further information on this please see **Section 5 (Marketing)**.

### **Administration**

We use personal data for administrative purposes (keeping records of learner progress, Employers' health and safety checks). This includes:

- Internal reports
- maintaining databases of our learners, clients and employers
- performing our obligations under different contracts
- fulfilling orders for goods or services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

### **Internal research and analysis**

We carry out research and analysis on our learners, employers and clients, to determine the success of training programmes, service delivery or as part of client consultations. This helps inform our approach towards our level of service to our stakeholders, identify our strengths and areas for development as well as ensure that client safety is upheld throughout any treatments being administered.

## **4. DISCLOSING AND SHARING DATA**



This section explains how and why we use personal data to build profiles which enable us to understand our supporters, improve our relationship with them, and provide a better supporter experience.

### **Analysis and grouping**

We analyse our supporters to determine common characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location).

By grouping people together on the basis of common characteristics, we can ensure that group is provided with communications, products, and information which is most important to them. This helps prevent your inbox from filling up, and also means we aren't wasting resources on contacting people with information which isn't relevant to them.

### **Profiling to help us understand our learners and customers**

Client data will be processed and anonymised to identify common trends and different themes across our four training salons to help shape our services and delivery going forward.

### **Anonymised data**

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as gap analysis, feedback on our success rates. This information helps inform our actions, widen participation and improve our service delivery.

## **7. YOUNG PEOPLE**

### **Photographs, pictures, stories and competitions**

We train young people in our centres and in their own workplace as well as interacting with them at careers fairs and open events and capture their data through our website when they make an application. Only children aged 13 or over are able provide their own consent for online applications. (This is the age proposed in the Data Protection Bill and is subject to Parliamentary approval).

We take the safeguarding of our learners and prospective learners very seriously and all learners are asked for consent for their images and stories to be used in marketing activities (on our website, social media or in our publications) at the point of sign up and then consent is asked for again at time of activity. If we publish a young persons' picture, photo or story, we'll usually include their name and where they are from in it. Remember you or your child have the right to withdraw this consent at anytime and you can do so by contacting the marketing department via: [marketing@hoet.co.uk](mailto:marketing@hoet.co.uk).

**Parental permission:** If your child is under 16 (part of our Pre-16 programmes) then we'll need permission from you as their parent or carer for us to share a picture, photo or story with us.



### Where we store information

Heart of England Training stores your data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we'll allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

### How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being 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'll 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.

## 10. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- x the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
  - x the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
  - x the right to have inaccurate data rectified;
  - x the right to object to your data being used for marketing or profiling; and
  - x where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.
- Please keep in mind that there are exceptions to the rights above and, though 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 or wish to exercise them, please write to our Data Protection Officer at Heart of England Training, Suite One, Eleven Arches House, Yates Avenue, Rugby, Warwickshire, CV21 1FD or [dpo@hoet.co.uk](mailto:dpo@hoet.co.uk).

We can provide you with a template subject access form which includes guidance on how to make your request (and will help us respond more quickly). Please contact us for a copy of this.

## **Complaints**

You can complain to Heart of England Training directly by contacting our data protection officer using the details set out above. If wish to make a complaint which does not directly relate to your data protection and privacy rights, you can do so in accordance with our company's [complaints policy](#).

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 [www.ico.org.uk](http://www.ico.org.uk).

## **11. COOKIES AND LINKS TO OTHER SITES**

### **Cookies**

Our website does not use local storage (cookies).

### **Links to other sites**

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 using the 'Contact us' link at the top of the page).

If an external website requests personal information from you, the information you provide will not be covered by our Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

## **12. CHANGES TO THIS PRIVACY POLICY**

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.