



## Privacy Notice

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint.

We are a Data Controller under the terms of the Data Protection Act 2018 and the requirements of the EU General Data Protection Regulation (GDPR). This **Privacy Notice** explains what Personal Data we hold, why we hold and process it, who we might share it with, and the rights and freedoms of Data Subjects under the Law.

## Types of Personal Data

We hold personal data in the following categories:

1. Customers and clients
2. Enquiries, correspondence, and complaints
3. Advisors, consultants and/or other professional experts and suppliers
4. Communication through contact our website, email, text, social media messaging, social media posting or any other communication

## Why we process Personal Data (the “purpose”)

“Process” means we obtain, store, update, and archive data in relation to:

1. Preparation and submission of Licensing applications to the Court and any other bodies relevant to a particular application
2. Training programmes offered by our company and/or when acting as agent to another chosen provider
3. Circulation of newsletters, legislative updates and matters of general interest in hospitality, training, and marketing

## What is the Lawful Basis for processing Personal Data?

1. We process data because it is in our **Legitimate Interest** to do so. Without holding the data, we cannot work or advise effectively
2. We hold staff employment data because it is a **Legal Obligation** for us to do so
3. We hold contractors’ data because it is needed to **Fulfil a Contract** with us.

## Who might we share data with?

We only share data if it is done securely and it is necessary to do so. We may share data with the following people or organisations:

1. Data subjects themselves
2. Business associates and other professional advisors (e.g. referral to a specialist for work undertaken)
3. Employees, agents, and other companies in the same group
4. Suppliers and providers of goods or services
5. Persons making an enquiry or complaint
6. Financial organisations and advisers
7. Credit reference agencies, Debt collecting and trading agencies
8. Officers of Central Government, Statutory boards/Authorities etc.
9. Computer software suppliers and/or advisors for the sole purpose of providing software support

10. The Licensing Court and any other body relevant to a particular application including Government and non-government departments

It may also be necessary to share data with other government departments for example, a request of data for survey purposes or for legal obligations such as crime investigations.

### **Data Subjects' Rights**

Data subjects have the right to:

1. Be informed about the personal data we hold and why we hold it.
2. Access a copy of the data that we hold.
3. Check the information we hold about them is correct and make corrections if not
4. Have data erased in certain circumstances.
5. Transfer data to someone else if requested and it is safe and legal to do so.
6. Tell us not to actively process or update their data in certain circumstances.

### **Where your personal information is held**

Information may be held at our offices and those described above at '**Who might we share data with**'.

### **How long is the Personal Data stored?**

1. We will store data for as long as we are providing services or for as long as is required for legal purposes such as record keeping
2. Where for tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years even after they stop being customers; or
3. In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Third-Party Links**

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website and applications may become inaccessible or not function properly.

### **Learners**

We process Learner personal data to provide our training and certification services from initiation to completion. We are required to gather and submit personal data to be able to process a learner into a training programme and to share this data with the Learner management provider for initial login, assessment, diagnostic and analytical information and with the relevant awarding organisation.

Once a Learner is accepted into a training programme, we use the data for communication, training, reporting, provision of training materials & platforms, certification should you complete, and for the management and monitoring of progress. Depending on the programme we will share your data with an End Point Assessment Organisation. Learners that are not

accepted onto a programme or withdraw during the sign-up process will have all personal data captured up to that point erased during routine data analysis or upon specific request in writing.

For Learners we collect and hold name, email, social media handle, address, date of birth, phone/mobile number, and Unique Learner Number (ULN).

We regard the use and processing of the above personal data categories within the obligation of a contract entered into with us by the data subject for the provision of training services. Without it we could not deliver a training course. During your training programme we may be required to confirm personal data for funding and assessment purposes. This includes, but is not limited to, name and signature on funding forms, voice recordings to assess competence and in some cases video and/or audio recordings, dependent on the requirements of your training programme. We confirm this as being an obligation of a contract entered into by a data subject as we could not run the training without it.

### **Employers**

We process the personal data of the nominated person(s) within an Employer to provide training and certification services to the Employer's employees (Learners). We use this data to communicate with the Employer about a Learner's progress and any facilitation required. We also use this data to process the following: payments and if applicable, applications to the nominated End Point Assessment Organisation for assessment and certification.

### **Keeping your personal information secure**

We have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to raise a Concern about Personal Data**

We aim to ensure the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us to correct this information.

To protect confidentiality, we will ask you to verify your identity before we proceed with any request you make under this Privacy Policy. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act. From the date we receive this information we will make acknowledgement responses within 30 days.

We will try to deal with your request informally if you agree this is the best way to proceed, for example by providing you with the specific information you need over the telephone or by email. If we do hold information about you, you can ask us to correct any mistakes by making the request to the same email or postal address below. If we choose not to action your request, we will explain to you the reasons for our refusal

### **Changes to this privacy policy**

We may change this privacy notice from time to time – when we do, we will inform you via our website

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**How to contact us**

Any correspondence about personal data should be addressed to **Kenneth Kneale**, the manager, and Data Controller.

***Contact Details***

Full name of legal entity: Kneale Limited.      Email address: ken@kneale.im

Postal address: Maynrys, 21 First Avenue, Douglas, IM2 6BA.