

Privacy Notice

Date effective	Policy review date	Approver
08/03/2024	07/03/2025	Alex Pond
ITT.POL.0047	V6	

Introduction

Intertrain, a City & Guilds business, is committed to data security and the fair and transparent processing of personal data. This privacy notice sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, including the General Data Protection Regulation (EU) 2016/679 (EU GDPR), The UK GDPR and Data Protection Act 2018 (DPA).

Please read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

This website is owned and operated by Intertrain UK Ltd.

Intertrain respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and use our services, and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice and for a quick “at a glance” view of the type of personal information and how we use it, please see table below.

Important information and who we are

City & Guilds Intertrain (known as Intertrain) is a part of the City & Guilds businesses. For more information on City and Guilds business please visit [About us | City & Guilds \(cityandguilds.com\)](https://www.cityandguilds.com/about-us)

Purpose of this privacy notice

This privacy notice aims to give you information on how Intertrain collects and processes your personal data through your use of our website.

Controller

Intertrain is the controller of this website and responsible for your personal data (collectively referred to as “Intertrain”, “we”, “us” or “our” in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Intertrain (UK) Ltd (Co. No. 04696164).

Our Data Protection Registration Number is: ZA026176

Contact: Data Protection Manager

Email address: dp@cityandguilds.com

Postal address: Balby Court Business Campus

Balby Carr Bank

Doncaster

DN4 8DE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice

Any changes we may make to our Notice in the future will be posted on this Website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Notice.

Inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes using the contact details provided

Third-party links

The 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 the website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, photographs and telephone numbers
- **Identification Evidence Data** includes uploaded passport, utility bills, birth certificate, drivers license or any other identification evidence for the purpose of validating your identity
- **Employment Data** includes employment status and job title
- **Educational & Qualifications Data** – includes details on any qualifications gained or courses attended relevant to the delivery of our service
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and/or payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Services Data** includes Customers employee names and contact details along with details on job roles and qualifications
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- **Usage Data** includes information about how you use our website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data (this can include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may collect, use, store and transfer different kinds of special personal data about you which we have grouped together as follows:

- **Medical Information** includes health information which could impact an individual's ability to perform their job or role such as; accidents, physical or learning disabilities, details on physical fitness and drug & alcohol tests
- **Ethnicity** is collected during the application and feedback process for equality and monitoring purposes

If you fail to provide personal data

Where we need to collect personal data by law, or in order to provide our services to you and you fail to provide that data when requested, we may not be able to provide such services. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity and Contact data when you contact us via this website or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties such as your employer and public sources.
- We may also receive personal data about you if you use any of the other websites which we, or another company within the City & Guilds business, or the other services and/or products which we, or another company within the City & Guilds business, provide. You can find out more about the City & Guilds business here [About us | City & Guilds \(cityandguilds.com\)](https://www.cityandguilds.com)

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Such as via the 'Contact' service on this website
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
To register you as a new customer or learner	(a) Identity (b) Contact (c) Employment (d) Educational (e) Medical (f) Ethnic	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Purposes of preventative or occupational medicine, for assessing the working capacity of the learner (d)	Retained for as long as you are a client. For learners any information required as part of your learning records are retained for 7 years
To process and deliver our services including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Employment (d) Educational (e) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Purposes of preventative or occupational medicine, for assessing the	Retained for as long as you are a client. Any billing information retained for 7 years for tax purposes. Any qualification

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
(b) Collect and recover money owed to us (c) Provide our core learning and training services	(f) Medical	working capacity of the learner.	data such as your learning records are retained for 7 years
To process any enquiry	(a) Identity (b) Contact	(a) Necessary for our legitimate interests	When we process a query or question as part of the service, we will need to process your Identity and Contact information in order to respond to your questions. The question and our response will only be retained for the duration of the time that you are a customer or enquirer and then will be deleted.
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you	From time to time we may change our policy, terms of use or the way

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
(a) Notifying you about changes to our terms or privacy notice when applicable. (b) Notifying you of changes or updates to our services or products that we feel may be of interest to you	(c) Profile (d) Marketing and Communications	(b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)	in which the services operate. We may need to process your information to communicate those changes. Where you are required to accept a change, we will keep a record of that acceptance which may include your personal data to identify you have accepted such changes.
To administer and protect our business	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	Retention period – only for as long as is necessary. May be aggregated and identity removed and will no longer be personal data capable of identifying you. No more than 12 months if not aggregated.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
To improve our, products/services, marketing, customer relationships and experiences	(a) Identify (b) contact (c) Marketing and communication	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	Retention period – only for as long as is necessary. May be aggregated and identity removed and will no longer be personal data capable of identifying you. No more than 12 months if not aggregated.

Direct marketing

We will gain your prior consent before we send any direct marketing communication to you electronically.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time at Sales@intertrain.biz.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

External Third Parties as set out in the *Glossary*.

We may also share your personal data with another company within the City & Guilds business. You can find out more about the City & Guilds business here [About us | City & Guilds \(cityandguilds.com\)](#)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Where a third party recipient is located outside the UK, European Economic Area or any other approved country or territory, we will ensure that the transfer of personal data is protected by appropriate safeguards, including international data transfer agreements in the UK, and the use of standard data protection clauses adopted or approved by the European Commission when applicable.

In some circumstances we share personal data within the City & Guilds business, including City & Guilds companies registered in the UK and outside of the UK to maintain and improve current and future services, customer engagement, and sales opportunities across our business.

Any shared access of personal data is subject to restrictions both legally and contractually.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. All data on this website is hosted on in the UK and encrypted with password and role protection. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention – how long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under applicable data protection law, you have various rights with respect to our processing of your personal data. Please review the detail below to find out more about your legal rights. If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than a calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please note that applicable data protection laws set out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your

personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note

that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Contact

If you have any queries about this Notice, the way in which Intertrain processes personal data via our Website, or about exercising any of your rights, you can send an email to dp@cityandguilds.com or write to Data Protection, City & Guilds, Giltspur House, 5-6 Giltspur Street, London, EC1A 9DE