

Privacy Policy

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Contents

- Introduction and purpose 4
- Data protection contact 4
- Registrations 4
- Changes to this policy 5
- Our commitment to the Data Protection Principles 5
- Transfers of personal information across our businesses 6
- A note on terminology and scope 7
- How we safeguard data relating to clients, instructing officers, and their matters 7
 - What information we hold about clients and instructing officers 7
 - What information we may need to hold about individuals related to the matter 9
 - How we collect this information 10
 - How we use this information 10
 - How we use this sensitive information 12
 - How long we keep this information 13
 - Who we may need to share this information with 13
- How we safeguard data relating to learners 14
 - What information that we hold about learners 14
 - What sensitive personal information we hold about learners 15
 - How we collect this information 15

How we use this information	15
How we use this sensitive information	16
How long we keep this information	16
Who we may need to share this information with	17
How we safeguard data relating to subscribers and interested parties	17
What information we hold about subscribers and interested parties	17
How we collect this information	17
How we use this information	18
How long we keep this information	18
Who we may need to share this information with	18
If you fail to provide personal information.....	19
Change of purpose	19
Third-party links	19
Data security.....	19
Changes to your data.....	20
Automated decision making	20
Your rights	20
Still Have Questions?	22

Introduction and purpose

- Beverley Bell Consulting Limited is a leading consulting provider of compliance, safety, and operations for organisations in the transport, construction, and related industries.
- Beverley Bell Training Services Ltd is a leading provider of compliance training for transport industries.
- Ridgeway Training Limited is a 30-year-old provider of training for transport professionals.
- The Transport Manager Academy Limited is a professional association supporting Transport Managers and responsible parties.

This Privacy Notice is issued on behalf of these companies as a whole. When we mention “the Company”, “we”, “us” or “our”, we are referring to the relevant business entity responsible for collecting or processing your data.

We are registered at Thorneloe House, 25 Barbourne Road, Worcester, WR1 1RU

Data protection contact

Oversight of this policy is the responsibility of our designated Data Protection Officer (DOP). If you'd like to raise a question about this policy or about our personal data practices, please write to the DOP using the details set out below.

Email: info@beverleybell.co.uk

Postal address:

Data Protections
Beverley Bell Consulting
Beverley Bell Consulting & Training Ltd
A10 & A11 Arundel House
Ackhurst Business Park
Foxhole Road
Chorley
PR7 1N

Registrations

Beverley Bell Consulting Limited (10800622), Beverley Bell Training Services Ltd (13159451), Ridgeway Training Limited (09279858), and The Transport Manager

Academy Limited (15765685) are registered as separate entities as private limited companies in England.

Additionally, the following companies are registered with the Information Commissioner's Office:

- Beverley Bell Consulting Limited (ZA466376)
- Beverley Bell Training Services Ltd (ZB253775)
- Ridgeway Training Limited (ZA326209)
- The Transport Manager Academy Limited (pending)

Changes to this policy

We may revise this policy from time to time to reflect changes in our practices or legal requirements. Any updates will be published on this page, so we encourage you to check back periodically. Where a change is significant, we will take steps to notify you directly.

Our commitment to the Data Protection Principles

Our privacy programme is built around the following data protection principles, which guide every decision we make about personal information

Data protection is a standard we hold ourselves to in how we design our systems, train our people, and make decisions about personal information. This commitment is anchored in the principles set out in Article 5 of the UK GDPR, which we've translated into the following practical commitments:

- **We are open about what we do.** We process personal information lawfully and fairly, and we're clear with people about how and why their data is used.
- **We don't repurpose data quietly.** Information is collected for specific, legitimate reasons that we explain upfront, and we don't use it for anything materially different without good reason and, where required, without telling you first.
- **We take only what we need.** We limit ourselves to the personal information that's genuinely relevant to the purpose at hand with nothing collected "just in case."
- **We keep it right.** We take reasonable steps to ensure the information we hold is accurate, and to correct or remove it where it isn't.

- **We don't keep it forever.** Personal information is retained only for as long as it serves the purpose it was collected for, and is disposed of responsibly once that purpose has passed.
- **We protect it properly.** Appropriate technical and organisational safeguards are in place to protect personal information against unauthorised access, loss, or damage.
- **We hold ourselves accountable.** We maintain records, policies, and internal oversight that allow us to demonstrate our compliance with these principles at any time.

These commitments apply across all of our companies and inform how our Data Protection Officer (DOP) oversees our data protection programme.

Transfers of personal information across our businesses

Beverley Bell Consulting Limited, Beverley Bell Training Services Ltd, Ridgeway Training Limited, and The Transport Manager Academy Limited are separate legal entities under common ownership, sharing management, systems, and data protection practices, and in places staff, infrastructure, and administrative functions.

Because of this, personal information may be accessed, used, or transferred between these businesses where necessary to:

- provide a service or product offered by more than one of these businesses;
- allow staff working across these businesses to carry out their role (for example, where someone's position spans more than one entity, or where central functions such as IT, finance, or compliance support several businesses at once);
- maintain consistent compliance, safety, and administrative standards; or
- respond to a request, complaint, or query that touches more than one business's services.

Wherever your information is shared in this way, it remains subject to the protections set out in this Privacy Notice, regardless of which business is accessing it. We do not share personal information between these businesses for unrelated marketing or commercial purposes without a proper legal basis.

Sharing with external suppliers, vendors, contractors, or accreditation and awarding bodies (for example, in connection with the processing of CPD hours or qualifications) is addressed individually within the relevant section for each data subject category, where the specific third party and purpose are named.

A note on terminology and scope

Personal information refers to any information relating to a living individual who can be identified from it, either directly or when combined with other information available to us. Information is no longer personal information once it has been anonymised in a way that means the individual can no longer be identified from it.

Special category data refers to certain kinds of personal information that the law treats as more sensitive, because of the risk it poses to an individual if misused including information about health, racial or ethnic origin, religious or philosophical beliefs, sexual orientation, and similar categories set out in data protection law. This information requires additional safeguards, and we explain where relevant sections of this Notice how and why we handle it.

The personal information we collect, and how we use it, depends on your relationship with us. We may collect personal information about:

- **Clients, instructing officers, and matter-related individuals** when you engage us for consulting or compliance services;
- **Learners** when you register for training or accreditation;
- **Subscribers and interested parties** when you sign up to receive our newsletters or marketing communications;
- **Contractors** (including course tutors) when you're engaged to deliver services on our behalf; and
- **Job Applicants** when you apply for a role with one of our businesses.

Each of these relationships is addressed in its own section below, setting out the specific information we collect, how we use it, and who we may share it with.

How we safeguard data relating to clients, instructing officers, and their matters

What information we hold about clients and instructing officers

Some of these categories of information (particularly contact and identification information (A), business information (B), and matter-related information (J)) may be collected during an initial enquiry or consultation, before we are formally engaged to act for you.

We collect, store, and use some or all of the following categories of personal information about clients and instructing officers:

(A) Contact and identification information: name, job title, postal address, telephone number, email address, and, where relevant to verifying your identity for the purposes of our engagement, date of birth.

(B) Business information: company name, registered address, company registration number, legal entity type (e.g., limited company, partnership, sole trader), company website, and company telephone number and email address.

(C) Financial information: bank account details and related payment information, held for the purposes of processing invoices and payments arising from our relationship with you.

(D) Relationship information: details of the length and nature of our relationship with you, the services you have engaged us for, our contacts with you (including meetings, calls, and other engagement), and feedback, references, or reviews you have provided.

(E) Marketing information: name, job title, company, contact details, engagement details (such as email open and click-through rates), event attendance, and your marketing preferences.

(F) Social media information: your username, company details, and engagement details (such as likes, shares, comments, or reactions) where you interact with our social media accounts.

(G) Monitoring: CCTV footage, vehicle details, visitor sign-in or access records, and use of our IT and communications systems, where you visit our premises or use our systems.

(H) Technical data: your online browsing activity on our website, IP address, browser type and version, device type, and operating system.

(I) Due diligence and background information: publicly available information used to understand who we are entering into a business relationship with, including information from Companies House, the Vehicle Operator Licensing Service, and other publicly accessible sources.

We may also hold personal information about you individually within the broader records where information about you specifically arises in the course of a matter. That information is described below, along with how it is used, whether it relates to you or to others connected to the matter.

What information we may need to hold about individuals related to the matter

Depending on the nature of the work we are instructed to carry out, we may collect, store, and use the following category of personal information about individuals connected to a client's business: for example, drivers, transport managers, directors, or other employees:

(J) Matter-related information: the categories of personal information we hold for the purposes of a specific matter will vary depending on the type of matter. Where we have collected this information from a source other than the individual themselves, we will take reasonable steps to confirm its accuracy where appropriate. By way of example, this may include driver conduct and qualification records, vehicle and fleet-related records, regulatory correspondence or interventions naming a specific individual, and operational records such as incident reports, risk assessments, or induction records. This information may be collected during an initial enquiry or consultation, as well as once we are formally instructed on a matter.

This list is not exhaustive, and we may need to collect additional information relevant to the specific matter.

What sensitive personal information we hold about clients, instructing officers, and individuals related to the matter

In some circumstances, we may collect, store, and use the following categories of sensitive personal information about clients, instructing officers, and other individuals connected to a matter:

(K) Relationship information (sensitive): accessibility requirements and dietary needs, where relevant to your attendance at our premises or events.

(L) Health information (sensitive): health-related information arising in the course of a matter: for example, in connection with an incident, medical questionnaire, or disclosure. In rare circumstances, this may include information about a child, where the child was involved as a casualty or party to an incident connected to a client's business.

(M) Criminal records: criminal convictions and offences, allegations of the same (including unproven allegations), spent or previous convictions, or involvement in an offence as a victim or witness, where relevant to regulatory reputational requirements or a specific matter.

How we collect this information

We collect personal information in categories (A), (B), and (C) directly from clients and instructing officers as part of our onboarding process. We may also obtain elements of category (B) from publicly available sources such as Companies House.

We collect personal information in category (I) from publicly available sources, including Companies House, the Vehicle Operator Licensing Service, and other publicly accessible information, as part of understanding who we are entering into a business relationship with.

We collect personal information in category (J) directly from clients and instructing officers as we take instructions on a specific matter. We may also obtain this information from other sources connected to the matter, including a client's own staff or records, regulatory or enforcement bodies, and publicly available registers.

We also collect personal information in categories (A), (B), and (J) during an initial telephone consultation or enquiry meeting, where you contact us to discuss a potential matter before we are formally engaged.

We collect personal information in category (D) directly from clients and instructing officers over the course of our relationship, and via the relationship management systems and tools we use to support our services.

We collect personal information in category (E) directly from clients and instructing officers, or through engagement with our marketing communications and events.

We collect personal information in category (F) either directly, or when clients and instructing officers engage with our social media accounts.

We collect personal information in categories (G) and (H) when clients or instructing officers visit our premises, or use our website, IT, or communications systems.

We collect personal information in categories (K), (L), and (M) directly from clients and instructing officers, from a client's own records or personnel, or, where relevant to a specific matter, from regulatory or enforcement bodies.

How we use this information

We will only use personal information when the law allows us to, and we identify a lawful basis for each use. We rely on a number of lawful bases, including consent, performance of a contract, compliance with a legal obligation, and our legitimate interests (or those of a third party), where these are not overridden by your interests or rights.

Where you contact us for an initial consultation before becoming a client, our lawful basis for using the information you provide is that it is necessary for us to take steps, at your request, in order to enter into a contract with you.

(A) Contact and identification information: used to communicate with you, take instructions, and deliver the consulting, compliance, or training services you have engaged us for. For clients, our lawful basis is that this is necessary to perform our contract with you. For instructing officers, our lawful basis is our legitimate interest in delivering the services requested by the entity you represent.

(B) Business information: used to establish who we are contracting with and to deliver services relevant to your business. Our lawful basis is the same as category A, applied on the same client/instructing officer distinction.

(C) Financial information: used to process invoices and payments. Our lawful basis is that this is necessary to perform our contract with you, and, where relevant, to comply with our legal obligations relating to financial record-keeping.

(D) Relationship information: used to manage and strengthen our relationship with you, including coordinating the services you receive across our businesses. Our lawful basis is our legitimate interest in managing client relationships effectively and providing a consistent service.

(E) Marketing information: used to contact you with newsletters, updates, and event invitations relevant to our services, and to measure engagement with our communications. Our lawful basis is your consent, or our legitimate interest in promoting services we reasonably believe are of interest to you or your organisation. You may object to marketing or update your preferences at any time using the contact details in this Notice, or by using the unsubscribe link in any marketing communication.

(F) Social media information: used in the course of operating our social media accounts. Our lawful basis is our legitimate interest in maintaining an engaging and relevant social media presence and responding to engagement.

(G) Monitoring: used to manage access to our premises, for security purposes, and to protect our IT and communications systems. Our lawful basis is our legitimate interest in the security of our people, premises, and systems.

(H) Technical data: used to understand how our website is used and to improve its performance and content. Please see our Cookie Policy for further information.

(I) Due diligence and background information: used to understand who we are entering into a business relationship with, and to manage commercial and reputational risk before taking on a new client. Our lawful basis is our legitimate interest in making informed decisions about the clients we work with.

(J) Matter-related information: used to provide the consulting, compliance, or training services we are instructed to deliver. For clients, our lawful basis is that this is necessary to perform our contract with you. For instructing officers, our lawful basis is our legitimate interest in pursuing the interests of the entity you represent in receiving our services.

How we use this sensitive information

Special categories of particularly sensitive personal information require a higher level of protection. In addition to identifying a lawful basis, we must identify further justification for collecting, storing, and using this type of personal information. We maintain an appropriate policy document and safeguards, as required by law, for the special category and criminal offence data we process.

(K) Relationship information (sensitive): used to ensure our premises, services, and events are accessible and inclusive. Our lawful basis is our legitimate interest in ensuring clients and instructing officers can access and make use of our services and events.

(L) Health information (sensitive): used to provide the consulting, compliance, or training services we are instructed to deliver, including, where relevant, compiling matter-related information for submission to the Office of the Traffic Commissioner in connection with public inquiries or other regulatory proceedings. For clients, our lawful basis is that this is necessary to perform our contract with you. For instructing officers, our lawful basis is our legitimate interest in pursuing the interests of the entity you represent. Our further justification is that processing is necessary for reasons of substantial public interest, under the condition relating to the exercise of a function intended to protect the public against dishonesty, malpractice, or other seriously improper conduct (Data Protection Act 2018, Schedule 1, Part 2, paragraph 12). Because this information typically relates to individuals: such as employees or drivers: who are not our client or instructing officer, and with whom we have no direct means of contact, it is not feasible for us to seek consent from those individuals without prejudicing the purpose of the processing.

(M) Criminal records: used to assess regulatory reputational requirements and to provide advice relevant to a specific matter, including, where relevant, compiling matter-related information for submission to the Office of the Traffic Commissioner in connection with public inquiries or other regulatory proceedings. For clients, our lawful basis is that this is necessary to perform our contract with you. For instructing officers, our lawful basis is our legitimate interest in pursuing the interests of the entity you represent. Our further justification is that processing is necessary for reasons of substantial public interest, under the condition relating to the exercise of a function intended to protect the public against dishonesty, malpractice, or other seriously improper conduct (Data Protection

Act 2018, Schedule 1, Part 2, paragraph 12). Because this information typically relates to individuals: such as employees or drivers: who are not our client or instructing officer, and with whom we have no direct means of contact, it is not feasible for us to seek consent from those individuals without prejudicing the purpose of the processing.

How long we keep this information

We keep personal information 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.

As a general rule, we retain personal information relating to clients, instructing officers, and matters for a period of 6 years from the end of our relationship or the conclusion of the relevant matter, reflecting the statutory limitation periods that typically apply to contractual and negligence-related claims under the Limitation Act 1980.

Where an enquiry or initial consultation does not result in us being formally engaged, we will retain the information collected for up to 12 months from the date of that enquiry or consultation. In practice, many enquiries are resolved more quickly than this (for example, where a decision is required urgently, such as in response to a regulatory call-up letter, information relating to enquiries that do not proceed is typically deleted or reviewed much sooner). Where an enquiry relates to a longer-cycle matter, such as a compliance or health and safety review, we may retain the information for longer within this 12-month period to allow for a realistic decision-making timeframe.

In some circumstances we may need to retain information for longer than this period (for example, where a matter remains ongoing, where required by a specific legal or regulatory obligation, or where necessary to establish, exercise, or defend legal claims). Where this applies, we will retain the information only for as long as that specific reason continues to apply.

Who we may need to share this information with

We may share personal information with the following categories of recipients, where relevant to the purposes described in this Notice:

- **Regulatory and enforcement bodies**, including the Office of the Traffic Commissioner and the Driver and Vehicle Standards Agency, where relevant to a specific matter.
- **Professional advisers**, such as barristers or other consultants instructed in connection with a matter.
- **IT, software, and case management providers** who host or process personal information on our behalf, including case management, document management, and legal research platforms. Some of these providers may store

information outside the United Kingdom; where this is the case, we ensure that appropriate safeguards are in place in accordance with data protection law.

- **The other businesses named in this Notice**, in the circumstances described under "Transfers of personal information across our businesses" above.

We use a number of specific providers to deliver our services, and we are happy to provide further detail about the specific organisations we work with on request. Please contact us using the details set out in this Notice.

How we safeguard data relating to learners

What information that we hold about learners

We collect, store, and use some or all of the following categories of personal information about learners:

(A) Contact and identification information: name, postal address, telephone number, email address, and date of birth. Date of birth is collected where required for registering you for an exam, qualification, or CPD activity with a relevant awarding or accreditation body.

(B) Business information: where you are booked onto a course by, or your training is paid for by, a business, we may also hold that company's name, address, and contact details.

(C) Financial information: payment and transaction details relating to course fees or related charges.

(D) Identification and credential numbers: government-issued identification (such as a driving licence, passport, or Commercial Driver Licence), membership numbers with relevant professional bodies (such as the Society of Operations Engineers or the Chartered Institute of Logistics & Transport), and learner numbers issued by bodies such as the Chartered Institute of Logistics & Transport, DVSA, FORS, or Beverley Bell Training.

(E) Learner records: details of current and previous courses attended with us, CPD hours undertaken with us or reported to us as completed with other providers (such as CILT, FORS, or DVSA), attendance and progression records, exam enrolment details (including scheduling, preferences, results, and resits), and certificate numbers.

(F) Birth details: your city and country of birth, collected solely where required for exam registration with the Chartered Institute of Logistics & Transport. This information is not used to infer or determine any special category data.

What sensitive personal information we hold about learners

In some circumstances, we may collect, store, and use the following category of sensitive personal information about learners:

(G) Learner health information (sensitive): information relating to reasonable adjustment requests, including requests relating to access, dietary needs, or learning support.

How we collect this information

We collect personal information in categories (A), (B), and (C) directly from learners as part of course booking and registration.

We collect personal information in category (D) directly from learners, and, where relevant, from professional or accreditation bodies confirming membership or learner numbers.

We collect personal information in categories (E) and (F) directly from learners, and from the accreditation and awarding bodies we work with in connection with course delivery, exam registration, and CPD reporting (for example, the Chartered Institute of Logistics & Transport, DVSA, or FORS).

We collect personal information in category (G) directly from learners, where they choose to make us aware of a reasonable adjustment requirement.

How we use this information

We will only use personal information when the law allows us to, and we identify a lawful basis for each use. We rely on a number of lawful bases, including consent, performance of a contract, compliance with a legal obligation, and our legitimate interests, where these are not overridden by your interests or rights.

(A) Contact and identification information: used to register you for a course, communicate with you, and administer your booking, including registering you for an exam, qualification, or CPD activity where relevant. Our lawful basis is that this is necessary to perform our contract with you.

(B) Business information: used to administer bookings made by, or billed to, a business on your behalf. Our lawful basis is that this is necessary to perform our contract, or, where the contract is with your employer rather than you directly, our legitimate interest in delivering the training that has been arranged for you.

(C) Financial information: used to process course fees and related payments. Our lawful basis is that this is necessary to perform our contract with you, and, where relevant, to comply with our legal obligations relating to financial record-keeping.

(D) Identification and credential numbers: used to verify your identity and eligibility for a course or qualification, and to register you with the relevant professional or accreditation body. Our lawful basis is that this is necessary to perform our contract with you.

(E) Learner records: used to deliver your course, record your attendance and progression, register and report your results, and support your CPD and qualification requirements with relevant accreditation bodies. Our lawful basis is that this is necessary to perform our contract with you.

(F) Birth details: used solely to register you for a Chartered Institute of Logistics & Transport exam, where this information is required by that body. Our lawful basis is that this is necessary to perform our contract with you.

How we use this sensitive information

Special categories of particularly sensitive personal information require a higher level of protection. In addition to identifying a lawful basis, we must identify further justification for collecting, storing, and using this type of personal information. We maintain an appropriate policy document and safeguards, as required by law, for the special category data we process.

(G) Learner health information (sensitive): used to understand and accommodate any reasonable adjustments you may need to access our courses, premises, or assessments. Our lawful basis is our legitimate interest in ensuring our courses and premises are accessible and inclusive. Our further justification is that processing is necessary for reasons of substantial public interest, under the condition relating to the provision of support for individuals with a particular disability or medical condition (Data Protection Act 2018, Schedule 1, Part 2, paragraph 16), or, alternatively, on the basis of your explicit consent to share this information with us.

How long we keep this information

We keep personal information 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.

As a general rule, we retain personal information relating to learners for a period of 6 years from the end of your last course or engagement with us, reflecting the statutory limitation periods that typically apply to contractual claims under the Limitation Act 1980.

Some information may need to be retained for longer than this period (for example, where required by an accreditation or awarding body's own record-keeping requirements, or where necessary to establish, exercise, or defend legal claims). Where

this applies, we will retain the information only for as long as that specific reason continues to apply.

Who we may need to share this information with

We may share personal information with the following categories of recipients, where relevant to the purposes described in this Notice:

- **Accreditation and awarding bodies**, such as the Chartered Institute of Logistics & Transport, DVSA, and FORS, for the purposes of exam registration, CPD reporting, and qualification administration.
- **IT, software, and learning management providers** who host or process personal information on our behalf. Some of these providers may store information outside the United Kingdom; where this is the case, we ensure that appropriate safeguards are in place in accordance with data protection law.
- **The other businesses named in this Notice**, in the circumstances described under "Transfers of personal information across our businesses" above.

We use a number of specific providers to deliver our services, and we are happy to provide further detail about the specific organisations we work with on request. Please contact us using the details set out in this Notice.

How we safeguard data relating to subscribers and interested parties

What information we hold about subscribers and interested parties

We collect, store, and use some or all of the following categories of personal information about subscribers and other interested parties:

(A) Contact information: name, email address, and, where provided, postal address or telephone number.

(B) Marketing and engagement information: your marketing preferences and consent status, and, where applicable, engagement with our communications (such as email opens or click-throughs).

How we collect this information

We collect personal information in category (A) directly from you, where you choose to sign up to receive updates or communications from us, currently via our website.

We collect personal information in category (B) directly from you, based on the preferences you provide when signing up, and from your ongoing engagement with our communications.

We do not add individuals to our marketing lists without a clear opt-in, and we do not obtain contact information through data scraping or purchased lists.

How we use this information

We will only use personal information when the law allows us to, and we identify a lawful basis for each use.

(A) Contact information: used to send you the updates or communications you have signed up to receive. Our lawful basis is your consent.

(B) Marketing and engagement information: used to manage your preferences, honour your consent choices, and understand engagement with our communications so that we can improve their relevance. Our lawful basis is your consent. You may withdraw your consent, or update your preferences, at any time using the contact details in this Notice, or by using the unsubscribe link included in any marketing communication.

How long we keep this information

We retain your information for as long as you remain subscribed to receive communications from us. If you unsubscribe or withdraw your consent, we will stop using your information for marketing purposes and will delete or anonymise it within 3 months, save where we need to retain a limited record of your unsubscribe or objection to ensure we do not contact you again in future.

Who we may need to share this information with

We may share personal information with the following categories of recipients, where relevant to the purposes described in this Notice:

- **IT, software, and marketing platform providers** who host or process personal information on our behalf. Some of these providers may store information outside the United Kingdom; where this is the case, we ensure that appropriate safeguards are in place in accordance with data protection law.
- **The other businesses named in this Notice**, but only where you have specifically opted in to receive marketing from more than one of these businesses. Where no such opt-in exists, your information is not used for marketing purposes by any business other than the one you signed up with.

We use a number of specific providers to deliver our services, and we are happy to provide further detail about the specific organisations we work with on request. Please contact us using the details set out in this Notice.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, where we cannot deliver a service, register you for a course, or process a payment without it). In these circumstances, we may have to delay or cancel the service or product you have with us, and we will tell you if this is the case at the time.

Change of purpose

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

Third-party links

This Notice does not cover any websites, tools, or services that we do not own or control, even where we link to them or they are used in connection with our services. If you follow a link from our website, or access a third-party tool or service through us, please check their own privacy notice, as we are not responsible for how they handle your personal information.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. We limit access to your personal information to those employees, contractors, and other third parties who have a genuine business need to access it, and they will only process your personal information on our instructions, subject to a duty of confidentiality.

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.

Changes to your data

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us — for example, if you change address, email, or telephone number.

Automated decision making

We do not currently make any decisions about you based solely on automated processing, including profiling, that produce legal effects or similarly significantly affect you. If this changes in the future, we will update this Notice accordingly and explain the logic involved, the significance of the decision, and your right to request human review.

Your rights

Data protection law gives you a number of rights over your personal information, focused on giving you control over how it is used. These rights are not absolute, some apply only in certain circumstances, as set out below.

Right to be informed: you have the right to be told how we collect and use your personal information. This Notice is how we meet that obligation.

Right of access: you have the right to request a copy of the personal information we hold about you, commonly known as a subject access request, so that you can check we are processing it lawfully.

Right to rectification: you have the right to ask us to correct any inaccurate or incomplete personal information we hold about you.

Right to erasure: you have the right to ask us to delete your personal information. This right applies in certain circumstances, for example where we no longer need the information for the purpose it was collected, where you withdraw consent and we have no other basis to continue, or where you have successfully objected to our processing. If we delete your information at your request, we will retain a minimal record of the request itself, so that we do not inadvertently use or collect the same information again in future.

Right to restrict processing: you have the right to ask us to pause our use of your personal information in certain circumstances, for example while we investigate a dispute about its accuracy, where you would otherwise be entitled to ask us to delete it but prefer that we restrict it instead, or where you need us to retain information to establish, exercise, or defend a legal claim even though we no longer need it for our own purposes.

Right to data portability: where we process your information based on your consent or a contract, and the processing is carried out by automated means, you have the right to receive that information in a structured, commonly used, machine-readable format, and to ask us to transfer it to another organisation where technically feasible.

Right to object: you have the right to object to our processing of your personal information where we rely on legitimate interests as our lawful basis, unless we can demonstrate compelling legitimate grounds that override your rights, or the processing is necessary to establish, exercise, or defend a legal claim. You have an unconditional right to object to your information being used for direct marketing, and can do this at any time using the unsubscribe link in any marketing communication, or by contacting us using the details below.

Right to withdraw consent: where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This will not affect the lawfulness of anything we did with your information before you withdrew consent.

Right related to automated decision-making and profiling: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you. As set out above, we do not currently carry out this kind of processing.

Right to complain: you have the right to complain about how we have processed your personal information. You can complain to us directly using the details found at the beginning of this Notice, and we will acknowledge your complaint within 30 days. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at ico.org.uk or by calling 0303 123 1113.

How to exercise your rights

To exercise any of the rights above, please contact our Data Protection Officer using the details set out in this Notice.

We may need to verify your identity before responding to a request, to ensure personal information is not disclosed to, or actioned for, anyone who is not entitled to it.

We aim to respond to all requests within one month. Where a request is particularly complex, or you have made multiple requests, this may take longer; if so, we will let you know and keep you updated.

You will not usually have to pay a fee to exercise these rights. However, we may charge a reasonable administrative fee, or decline to act on a request, where it is clearly unfounded, repetitive, or excessive.

Still Have Questions?

If anything in this Notice is unclear, or hasn't been covered, please get in touch using the contact details set out at the beginning of this Notice.

If you have any concerns about how we use your personal information, or wish to raise a complaint, please contact us in the first instance. We will investigate and aim to resolve your concerns promptly and fairly, in line with our internal complaints procedure.

If you're not satisfied with how we've addressed your concerns, you have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113

Web: www.ico.org.uk