



# PRIVACY POLICY

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Version	Change Detail	Latest Review Date	Date of Next Review	Updated By:
1.1	Annual Review & Policy Amended	03/12/2019	03/12/2020	Shabir Siddiq
1.2	Annual Review & Policy Amended	03/12/2020	03/12/2021	Shabir Siddiq
1.3	Annual Review & Policy Amended	07/12/2021	07/12/2022	Shabir Siddiq
1.4	Annual Review & Policy Amended	07/12/2022	07/12/2023	Shabir Siddiq
1.4	Annual Review Changed to Academic Year Start	01/08/2023	31/07/2024	Shabir Siddiq
1.5	Annual Review and name change	01/08/2024	31/07/2025	Shabir Siddiq

## PRIVACY STATEMENT

### INTRODUCTION

Within Alphabet Training we create and retain an Individual Learner Record (ILR), every learner account contains information that allows us to provide a personalised learning environment for each learner and meaningful reports on their activity and progress. This data is also used for processing funding claims in order to support your learning.

That information is completely under the control of Alphabet Training and we take seriously our role in storing and processing that data on your behalf. However, this information must be shared with Funding Providers and OFSTED.

### WHAT APPRENTICE DATA IS USED?

We store the following data for every learner:

- First Name
- Last Name
- Registration Number
- Sex
- Date of Birth
- Ethnicity
- Address and Postcode
- Telephone number
- Program of learning
- Achievements

### LAWFUL BASIS

The lawful bases for processing your data are set out in Article 6 of the UK GDPR. Alphabet Training data collection and processing is based on the following:

**(a) Consent:** the individual has given clear consent to process their personal data for a specific purpose.

**(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

### WHY IS YOUR DATA NEEDED?

Learner Data is only used to create learner accounts for individual progress tracking. Your data is shared with the Education Skills Funding Agency. We undertake not to use apprentice data for any commercial purpose.

Ethnicity data is used to ensure that Alphabet Training provides equal opportunities across all learner demographics.

## SECURITY

We store learner data on a secure server. Tutors and learners are assigned passwords that protect access to the system and ensure that only Alphabet Training staff can access your data. No third party can access it without permission.

## RETENTION OF RECORDS

We keep personal data and Learner Files:

- For as long as is necessary to fulfil the purposes we collected it for.
- As required by law.
- To enforce or defend legal claims.

Sometimes we will keep information that you have deleted, for example, messages sent by you to your tutor, as a record of your learning experience. We will keep this information for a reasonable time.

## ACCESSING YOUR PERSONAL DATA

If you wish to access personal data Alphabet Training holds about you under the Subject Access Request provision, please write to the HR office or the DPO.

## COMPLAINTS

If you are concerned about how your personal information has been handled/processed, or if you feel any infringement has taken place. In the first instance, please contact the Alphabet Training Data Protection Officer.

Alphabet Training Data Protection Officer – Shabir Siddiq

Tel: 07970347899/01254 679998, email: [Shabir@alphabet-training.co.uk](mailto:Shabir@alphabet-training.co.uk)

You have the right to raise a complaint with the Information Commissioners Office (ICO), details below:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

**Telephone:** 0303 123 1113

Or you could visit the ICO website and follow the online process. Website address below:

<https://ico.org.uk/make-a-complaint/>

## **STATUS OF THIS POLICY AND NEW INSTRUCTIONS**

This policy is for general purposes only and does not grant any contractual rights as such. Alphabet Training reserves the right to amend this policy from time to time, although we will notify you in writing of any changes.

Signed by the Managing Director



01/08/24