

Solutions 123 Limited Privacy Policy

The Company is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This Notice provides information to Clients, Individuals, Learners & those with Parental Responsibility for the provision of Training Services, Suppliers and Website Users (with links to sections below).

The Company is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: Solutions 123 Limited, The Maltings, East Tyndall Street, Cardiff, United Kingdom, CF24 5EA.

The Company is a training business which provides Training Services to individuals, adults and children, either privately or through organisations, known as Clients. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on a form on our website, or we may collect them from a third party, such as through an organisation or individual who is arranging for us to deliver our training services on your behalf. The Company must have a legal basis for processing your personal data.

1. Data Protection Principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your training in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

2. Collection and use of personal data

Clients/customers/individuals

Why we process your data

The Company will collect your personal data and will process your personal data for the purposes of providing you with training services, meeting your training requirements and keeping you up to date with our products and services. We may also require this information to help us to establish, exercise or defend legal claims.

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests

- to protect your interests and
- where something is done in the public interest

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

To enter into and perform your contract with us to provide the services (for example, contacting you to provide training service and ascertain requirements, to send you details of courses, invoices and other documents to fulfil the service.)

To meet our legal obligations, (for example ensuring we comply with training legislation, to prevent fraud).

We also collect data so that we can carry out activities which are necessary for our legitimate business interests and the interests of Client or Individual. These include:

- providing and administering the training service that you have requested, including obtaining information on training needs, providing you with course details, invoicing and payments
- providing you with updates to our products and services, such as offers and other training opportunities
- ensuring we can administratively and strategically run our business, including business planning, disaster recovery, preventing fraud, and dealing with any legal claims made against us
- ensuring our administrative and IT systems are secure and robust against unauthorised access

We believe that processing your data in this manner is a necessary, proportionate and reasonably expected outcome of your relationship with the Company as it is required to provide the services you have requested and that by processing this data it will have a minimal impact on your privacy and rights.

Where one of these reasons applies we may process your data without your consent.

If you do not provide your data to us

You may choose not to give us certain data, but you should be aware that this may prevent us from entering into a contract with you or complying with our legal obligations and this may in term affect our ability to provide the service to you.

Types of data we process

The personal data that we collect includes:

- Name, telephone number, email address, job title
- Any other information you provide necessary to provide the services to you
- Recordings of telephone conversations between you and the Company for purpose of establishing facts, evidencing transactions, monitoring quality, and for staff training purposes
- This list is not exhaustive.

Sharing your data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Colleagues within Solutions 123 Limited where it is necessary for them to undertake their duties
- Selected 3rd party processors, including those utilised to maintain internal software/hardware, for communications purposes or where we outsource any of our business functions under which we collect or store your data, in which case we will ensure that any such service provider adheres to at least the same obligations of security with regard to your data as undertaken by us
- Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of a third party
- Internal Accountants and Professional Advisors
- Relevant External Training Providers

We may also share your data as part of a Company sale or restructure, or for other reasons to comply with legal obligations upon us.

We will never sell your data to third parties for the purposes of marketing. Where your data is transferred to a third party acting as a data processor, the Company will:

- Ensure that the third party has sufficient security measures in place to protect the processing of data
- Have in place a written contract establishing what personal data will be processed and for what purpose

Learners & those with Parental Responsibility for the provision of Training Services

Why we process your data

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with training services, administering the contract, and ensuring the health and safety of all service users. We need to process your data during the booking process, during provision of the services, and following the termination of the services.

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the training contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

To enter into and perform your contract with us to provide the services (for example, performance and administration of the service contract, processing payments, identifying student academic levels to ensure suitability of the training provision, ensuring the health and safety of all parties involved within the service.)

We also need to collect your data to ensure we are complying with legal requirements (for example, ensuring the health and safety of all involved with service, complying with consumer law)

We also collect data so that we can carry out activities which are necessary for our legitimate business interests and the interests of the service user. These include:

- providing and administering the training service that you have requested, including keeping up to date personnel information, deciding on suitability courses, ensuring the health and wellbeing of involved within the service provision.
- keeping you up to date with products and services such as additional courses which may support the student
- ensuring we can administratively and strategically run our business, including business planning, disaster recovery, preventing fraud, and dealing with any legal claims made against us.
- ensuring our administrative and IT systems are secure and robust against unauthorised access

We believe that processing your data in this manner is a necessary, proportionate and reasonably expected outcome of your relationship with the Company as it is required to provide the services you have requested and that by processing this data it will have a minimal impact on your privacy and rights.

Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process the data in order to carry out the training service contract
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- to ensure the health and wellbeing of all involved in the provision of these services.
- to determine reasonable adjustments

- assess capacity to attend courses
- ensure statutory payments are made in accordance with the law

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights required to deliver the Service. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of the service being provided and where the law permits us. We use criminal conviction data to assess suitability for the service in line with our legal obligations. The level of the criminal convictions check will be dependent on the type of service to be delivered and will be conducted in line with legal requirements.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your contract to provide the Services. If you do not provide us with the data needed to do this, we will be unable to perform those services.

Types of Data that we process

The personal data, including sensitive personal data, that we collect includes:

- Name of personal with parental responsibility contracting for the Service
- Financial information required to process payment for the Service
- Name of student/s
- Age and gender of the student/s
- Relevant medical information about the student which is required to ensure the health and safety of all involved in the provision of the service
- Pre-Assessment information regarding the student's academic performance to assess the service requirements
- Records of any correspondence between parents / student and the Company about the Service
- Recordings of telephone conversations between you and the Company for the provision of the services and to manage the contractual relationship
- Equality details to ensure compliance with relevant equalities legislation and employment law.
- Images of Parents and Learners from our on-site CCTV systems if you attend courses at our offices
- IP addresses
- Other information relevant to assessing suitability for the services.

This list is not exhaustive.

Sharing your data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Colleagues within Solutions 123 Limited where it is necessary for them to undertake their duties
- Selected 3rd party processors, including those utilised to maintain internal software / hardware, for communications purposes or where we outsource any of our business functions under which we collect or store your data, in which case we will ensure that any such service provider adheres to at least the same obligations of security with regard to your data as undertaken by us
- Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of a third party
- Internal Accountants and Professional Advisors
- Relevant Safeguarding Authorities

We may also share your data as part of a Company sale or restructure, or for other reasons to comply with legal obligations upon us.

We will never sell your data to third parties for the purposes of marketing. Where your data is transferred to a third party acting as a data processor, the Company will:

- Ensure that the third party has sufficient security measures in place to protect the processing of data
- Have in place a written contract establishing what personal data will be processed and for what purpose

Suppliers

Why we process your data

The Company will collect your personal data and will process your personal data for the purposes of offering services to you or obtaining support, products and services from you. We require this information in relation to our agreements with you to contact you and administer the services. We may also require this information to help us to establish, exercise or defend legal claims.

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

To enter into and perform your contract with us to provide the services (For example, to contact you to procure/provide services and products, administration of the service, invoicing and payment).

To meet our legal obligations, (for example ensuring we comply with employment and equalities legislation, to prevent fraud).

We also collect data so that we can carry out activities which are necessary for our legitimate business interests. These include:

- contacting you to procure or provide the services and products from you and the future administration of any products or services provided
- providing you with updates to our products and services
- ensuring we can administratively and strategically run our business, including business planning, disaster recovery, preventing fraud, and dealing with any legal claims made against us
- ensuring our administrative and IT systems are secure and robust against unauthorised access

We believe that processing your data in this manner is a necessary, proportionate and reasonably expected outcome of your relationship with the Company, as it is required to provide the services you have requested and that by processing this data it will have a minimal impact on your privacy and rights.

Where one of these reasons applies we may process your data without your consent.

If you do not provide your data to us

You may choose not to give us certain data, but you should be aware that this may prevent us from entering into a contract with you or complying with our legal obligations and this may in term affect our ability to provide the service to you.

Types of data we process

The personal data that we collect includes:

- Name, telephone number, email address, roles of key contacts within your organisation
- Any other information you provide necessary to provide/receive the services to you
- Recordings of telephone conversations between you and the Company for purpose of establishing facts, evidencing transactions, monitoring quality, and for staff training purposes

This list is not exhaustive.

Sharing your data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Colleagues within the New Directions Group of Companies where it is necessary for them to undertake their duties
- Selected 3rd party processors, including those utilised to maintain internal software/hardware, for communications purposes or where we outsource any of our business functions under which we collect or store your data, in which case we will ensure that any such service provider adheres to at least the same obligations of security with regard to your data as undertaken by us

- Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of a third party
- Internal Accountants and Professional Advisors
- Relevant Safeguarding Authorities

We will never sell your data to third parties for the purposes of marketing. Where your data is transferred to a third party acting as a data processor, the Company will:

- Ensure that the third party has sufficient security measures in place to protect the processing of data
- Have in place a written contract establishing what personal data will be processed and for what purpose

Website users

We collect a limited amount of data from our Website Users, which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the enquiry function, we will collect any information that you provide to us, for example your name and contact details.

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content.

We process your data through our websites:

- In order to enter into and/or administer the contract the services requested
- In order for us to carry out our legitimate interests, including to provide training services to clients and individuals, ensuring we can administratively and strategically run our business

We believe that processing your data in this manner is a necessary, proportionate and reasonably expected outcome of the use of our websites and that processing your data in this manner will have a minimal impact on your privacy and rights.

More specifically, we will process your data in the following ways:

Enquiry forms

Visitors who use the mail forms to contact Solutions 123 Limited are required to enter a valid email address, and may also be required to enter their name. This information is required to enable the recipients of messages to be able to identify the sender(s) and to permit them to provide a response. Any visitor that does not wish to disclose this information must not use the mail forms.

Responsibility and/or liability for their use remains with the sender.

Emails sent via these forms, along with those sent via a standard email client, may be held on our email systems indefinitely, and may be accessible by other parties than the intended recipient (including systems administrators, managers and directors).

Visitor statistics

When someone visits this web site we collect standard server log information and some details relating to visitor behaviour (pages and files viewed, entry and exit pages, country, browser type, etc.). We do this to find out things such as the number of visitors to the various parts of the site and how they found that information which we use in order to help improve the web site. We collect this information in a way which does not identify anyone and we do not make any attempt to find out the identities of those visiting our web sites. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want or need to collect personally identifiable information through our website, we will be clear about when and why we are collecting this information. In addition to the server log files we also use Google Analytics in order to assess how our web sites are being used, and this data is treated in the same manner as that from the server logs.

To opt out of being tracked by Google Analytics across this website, visit here (<https://tools.google.com/dlpage/gaoptout>).

Cookies

Certain aspects of this site may require a visitor to permit a small text file, called a cookie, to be saved to their hard drive in order for those aspects to work appropriately.

The cookies set by this web site are used to:

- Permit users to log-in to certain sections of the web site: e.g. member or admin areas. The setting of these cookies is a requirement for access to these restricted areas.
- Allow Google Analytics and statistics software to track which areas of the web site are accessed by a visitor, as per the description above
- Allow a visitor to set a region or other specific search parameters to enable narrowing job search results

In accordance with the rules regarding the use of cookies, you may delete and block all cookies from this site, but parts of the site will not work appropriately. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

The following cookies are in use on this site:

Cookie	Cookie Name	Purpose	Further Information
Google Analytics	<ul style="list-style-type: none">• <u>__utm</u> a• <u>__utm</u> b• <u>__utm</u> c• <u>__utm</u> z• <u>_ga</u>	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site.	The cookies collect anonymous information, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Google Analytics Privacy Centre (Will

	<ul style="list-style-type: none"> • <code>_gid</code> 		open in a new window and Google Analytics Cookie Usage (Will open in a new window).
Online Services	Session Cookie (PHPSESSID)	This is a session cookie which holds a number of details such as your name and email address to allow us to identify you and retrieve information associated with and for you within our online services web portal.	This is an opt-in cookie which, once set, will remain on a visitor's computer until either the visitor clicks the Log Out link within their web portal or they close their browser window.
Cookie Notice	notice	This cookie is used across our sites to keep note of whether you've dismissed the cookie notice that appears on first and subsequent visits until dismissed, which links to this cookie policy section of our website.	This is an opt-in cookie which, once set, will remain on a visitor's computer for up to 1 year so that there's no need to dismiss the message on subsequent visits.
To opt out of being tracked by Google Analytics across this website, visit here (https://tools.google.com/dlpage/gaoptout).			

People whose data we receive from learners, such as emergency contacts

Why we process your data

The Company will collect your personal data and will process your personal data for the following purposes:

- Emergency Contacts – to contact you in the event of an accident or emergency affecting the individual who provided your details

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons.

We collect data so that we can carry out activities which are necessary for our legitimate business interests and the interests of our candidates. These include:

If a Client or Individual has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. This is in the legitimate interests of both the candidates and the emergency contact

We believe that processing your data in this manner is a necessary, proportionate and reasonably expected outcome of the legitimate interests and activities of the Company and benefits all parties involved whilst having a minimal impact on your privacy and rights.

Where one of these reasons applies we may process your data without your consent.

Types of data we process

The personal data that we may collect includes:

- Your Name, telephone number, email address, job title, place of work, relationship to learner
- Any other information you provide us in the reference
- Recordings of telephone conversations between you and the Company for purpose of establishing facts, evidencing transactions, monitoring quality, and for staff training purposes

This list is not exhaustive.

Sharing your data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Colleagues within Solutions 123 Limited where it is necessary for them to undertake their duties
- Selected 3rd party processors, including those utilised to maintain internal software/hardware, for communications purposes or where we outsource any of our business functions under which we collect or store your data, in which case we will ensure that any such service provider adheres to at least the same obligations of security with regard to your data as undertaken by us
- Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights if a third party
- Internal Accountants and Professional Advisors

We will never sell your data to third parties for the purposes of marketing. Where your data is transferred to a third party acting as a data processor, the Company will:

- Ensure that the third party has sufficient security measures in place to protect the processing of data
- Have in place a written contract establishing what personal data will be processed and for what purpose

3. Overseas transfers

We do not share your data with bodies outside of the European Economic Area.

4. How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for. Retention periods can vary depending on why we need your data. Different laws require us to keep different data for different periods of time.

Where the Company has obtained your consent to process your personal data and/or sensitive personal data we will do so in line with our data retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal and/or sensitive data.

The Company will only retain your personal data for periods as set out in our Data Retention Policy, unless otherwise specified by law.

5. Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

6. Your rights

Please be aware that you have the following data protection rights:

The right to be informed about the personal data the Company processes on you;

The right of access to the personal data the Company processes on you;

The right to rectification of your personal data;

The right to erasure of your personal data in certain circumstances;

The right to restrict processing of your personal data;

The right to data portability in certain circumstances;

The right to object to the processing of your personal data that was based on a public or legitimate interest;

The right not to be subjected to automated decision making and profiling; and

The right to withdraw consent at any time.

Where the Company have relied on your consent for processing your personal data and/or sensitive personal data you have the right to withdraw that consent at any time by contacting dataprotection@solutions123.co.uk. There will be no consequences for withdrawing your consent. However, in some cases we may continue to use data where so permitted by having a legitimate reason for doing so.

7. Complaints or queries

If you wish to exercise any of the rights listed in this notice or to complain about this privacy notice or any of the procedures set out in it please contact: dataprotection@solutions123.co.uk. or writing

to 'Data Protection, Solutions 123 Limited, The Maltings, East Tyndall Street, Cardiff, United Kingdom, CF24 5EA.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

8. Data Protection Officer

The Company's Data Protection Officer can be contacted by emailing dataprotection@solutions123.co.uk or writing to:

Data Protection Officer
Solutions 123 Limited
The Maltings
East Tyndall Street
Cardiff
CF24 5EA.