## Cyber Innovations customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- <u>Contact details</u>
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

#### Contact details

Email

admin@cyberinnovations.co.uk

#### What information we collect, use, and why

We collect or use the following information for information updates or booking on to our courses

- Name and contact details for learner/student
- Information about your identity (e.g. photo ID, passport information, NI number)
- Gender
- Pronoun preferences
- Date of birth

- Dietary requirements (including vegetarian, vegan, gluten free and halal requirements)
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)

We may also collect data indirectly from other legitimate sources such as via our instructors who deliver education and training courses on our behalf.

For courses booked by employers, we may receive information about you as provided by your employer. For these courses please also refer to your organisation's Privacy Notice for further details.

If you are an employer providing us with contact details of employees, other than yourself, for attending one of our courses, please ensure that the individual staff member is aware that you are sharing this information with us. We will process their personal information according to this Privacy Notice, so please encourage them to read it if they want to find out more.

Where we are required to collect personal data by law, or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to fulfil the contract. If you do not provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We collect or use the following information **for learner education and welfare**:

- Name and contact details for learner/student
- Gender
- Pronoun preferences
- Date of birth
- Dietary requirements (including vegetarian, vegan, gluten free and halal requirements)

- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data
- Exam results and qualifications
- Progress reports
- Information relating to compliments and complaints
- Exclusion, suspension and behavioural information
- Photographs (with your consent)

We also collect or use the following information for learner education and and welfare:

• Racial or ethnic origin

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Relevant information from previous investigations
- Correspondence
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data

We also collect the following information for **dealing with queries**, **complaints or claims**:

• Racial or ethnic origin

We collect or use the following information **for information updates or marketing purposes**:

- Names and contact details
- Marketing preferences
- Photographs (with your consent)
- Website and app user journey information
- Records of consent, where appropriate
- Alumni records

We collect or use the following information for archiving purposes:

- Names and contact details
- Photographs (with your consent)
- Website and app user journey information
- Alumni records

We also collect or use the following information **for archiving purposes**:

• Racial or ethnic origin

### Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information for learner education and welfare are:

 Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing** with queries, complaints or claims are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for information updates or marketing purposes are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information **for archiving purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

# Where we get personal information from

- Directly from you
- Instructors, Suppliers and service providers
- Third parties:
  - Your employer (where your employer booked you on to one of our sessions)

# How long we keep information

We will only retain your personal data for as long as is necessary to fulfil the purposes for which we collected the data, including the purpose of satisfying any accounting, legal or reporting requirements.

In deciding how long data is kept for, we consider the nature, sensitivity, and amount of data we hold about you, the purposes for which we process that data, including whether these can be achieved by other means and legal requirements and any potential risk of harm from unauthorised disclosure or use. We also consider any mandatory obligations on us to keep the data for a specified period of time (e.g. for accounting or legal purposes). For example, for tax purposes we are required by law to keep basic information about customers (including identity, contact, financial and transaction data) for a minimum of 6 years from when they cease being customers.

We will, where possible, anonymise personal information so that it can no longer be associated with the you, the individual, in which case we may use this information indefinitely without further notice to you.

# Who we share information with

Others we share personal information with

- Instructors
- IT infrastructure support to facilitate sharing information with you
- Payment processors (if you are paying for your own course)

- Organisations we're legally obliged to share personal information with
- Other relevant third parties:
  - Employer who sent person on the course

#### How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

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

#### Last updated

6 January 2025