
Title: **GENERAL DATA PROTECTION REGULATION PRIVACY POLICY**

1. **INTRODUCTION**

Jarvis Training Management Limited (JTM) is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how JTM will treat the personal data which you provide in compliance with applicable data protection law, which came into effect from 25th May 2018 which is the General Data Protection Regulation (EU) 2016/679 (**GDPR**).

Please read this policy carefully as it contains important information on who JTM are, how and why JTM collect, store, use and share personal data, your rights in relation to your personal data, how to contact JTM and supervisory authorities if you would like to report a concern about the way in which JTM processes your data.

2. **BACKGROUND**

Jarvis Training Management Ltd is an independent private training provider, company number 2354200 registered in England and Wales. JTM's registered address is located at:

Hudson House
Southern Gateway
Speke Boulevard
Liverpool
L24 9HZ

For the purposes of the GDPR, JTM is the 'controller' of the personal data you provide. If you have any queries about this policy, the way in which JTM processes personal data, or about exercising any of your rights, please send an email to JTM at info@jarvis-eu.com or write to the Data Controller, Data Protection, Jarvis Training Management Ltd, Hudson House, Southern Gateway, Speke Boulevard, Speke, Liverpool L24 9HZ.

JTM owns and operates www.jarvis-eu.com. This policy, together with the terms of use and any other documents referred to in them on JTM's website, sets out the basis on which JTM processes personal data.

3. **COLLECTION OF PERSONAL DATA**

JTM may collect and process the following personal data or information you may provide, if you:

- complete a form on JTM's website;
- complete a survey;
- correspond with JTM by phone, e-mail, or in writing;
- report a problem;
- sign up to receive JTM communications;
- create an e-learning account with JTM;
- enter into a contract with JTM to receive products and/or services
- JTM may collect your name, e-mail address, postal address, telephone number and job role

If you visit JTM's digital services, JTM may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit to JTM's website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain

pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

When JTM requests you to supply your personal data, it will be made clear whether the personal data that has been requested must be supplied, so that JTM can provide the products and services to you, or whether the supply of any personal data JTM requests, is optional:

- To provide the products and/or services to you;
- To communicate with you in relation to the provision of apprenticeships and other training and services.
- To provide you with administrative support such as account creation, security, for e-learning and responding to issues; and
- Provide you with industry information, surveys, and information about JTM's events, offers and promotions, related to the products and/or services.

Your personal data may be shared with staff within JTM. JTM take all reasonable steps to ensure that staff protect your personal data and are aware of their information security obligations. JTM limit access to your personal data to those who have a genuine need to know it.

JTM may also share your personal data with trusted third parties including:

- ESFA – Education and Skills Funding Agency
- Other professional trainers, Assessors, Internal and External Quality Assurers, from Awarding Organisations, consultants, and professional experts; Ofsted
- Service providers contracted to JTM in connection with provision of the products and services such as providers of IT services and customer relationship management services;
- Analytics and search engine providers that assist JTM in the improvement and optimisation of its website.

This includes any obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

4. INFORMATION JTM MAY RECEIVE FROM OTHER SOURCES

JTM may also receive information about you from other sources such as your employer, tutor and/or advisor.

5. INFORMATION ABOUT OTHER PEOPLE

If you provide information to JTM about any person other than yourself, such as your relatives, next of kin, your advisers, or employer, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to JTM and for you to allow JTM to use it.

6. SENSITIVE PERSONAL DATA

JTM may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, JTM will only do so based on your explicit consent.

7. HOW YOUR PERSONAL DATA IS USED BY JTM

When you are asked to supply your personal data, it will be made clear whether the personal data JTM are asking for must be supplied, so that JTM can provide the products and services to you, or whether the supply of any personal data requested is optional. JTM use your personal data to support

your application(s) for an apprenticeship or other training covering the products and/or services to you;

- To communicate with you in relation to the provision of the products and services;
- To provide you with administrative support such as e-learning accounts, security, and responding to issues; and
- Provide you with industry information, surveys, and information about events, offers and promotions, related to the products and/or services.

8. HOW LONG JTM WILL KEEP YOUR DATA FOR

Where there is a contract/agreement between yourself and JTM, your personal data will be retained for the duration of the contract/agreement, and for a period of three years with Awarding Organisations.

Your data will be retained following contractual obligations in line with Government contracts, as applicable, or following its termination or expiry, to ensure JTM are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

9. WHERE YOUR PERSONAL DATA IS SORTED AND HOW IT IS PROTECTED

JTM take reasonable steps to protect your personal data from loss or destruction. Procedures are in place to deal with any suspected data security breach and JTM will notify you and any applicable regulator of a suspected data security breach where JTM are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or e-learning platforms, you are responsible for keeping this password confidential. JTM asks you not to share a password with anyone.

All information and data that is stored on JTM's networks are encrypted and only transferred to staff who require such data, through secure data sheets which are password protected. Staff are notified on how to access the data through our secure in house procedures. Any data that is originally stored on paper is locked away, and if feasible, shredded once it has been uploaded to our online systems.

Unfortunately, the transmission of information via the internet is not completely secure. Although JTM will do its best to protect your personal data, the security of your personal data transmitted to JTM's website cannot be guaranteed, and any transmission is at your own risk. Once JTM have received your personal data, it will use strict procedures and security features to try to prevent unauthorised access.

10. YOUR RIGHTS:

a. RIGHT TO ACCESS:

You have the right to request a copy of the personal data that JTM hold about you by contacting JTM using the email or postal address given below within the contact section. Include with your request, information that will enable JTM to verify your identity and JTM will respond to you within 30 days of your request.

Please note that there are exceptions to your right of access as JTM may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if JTM are legally prevented from disclosing such information, or your request is manifestly unfounded or excessive.

b. RIGHT TO RECTIFICATION

JTM aim to keep your personal data accurate and complete and encourage you to contact JTM using the contact details provided below to let JTM know if any of your personal data is not accurate or changes need to be made, so that your personal data is kept up-to-date.

c. RIGHT TO ERASURE

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for JTM to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact JTM using the contact details provided below.

d. RIGHT TO OBJECT

In certain circumstances, you may have the right to object to the processing of your personal data where, for example, your personal data is being processed based on legitimate interests and there is no overriding legitimate interest for JTM to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the pressing of your personal data, please contact JTM using the contact details provided below.

e. RIGHT TO RESTRICT PROCESSING

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data JTM holds about you and JTM are verifying the information, you have objected to processing based on legitimate interests and JTM are considering whether there are any overriding legitimate interests, or the processing is unlawful, and you elect that processing is restricted rather than deleted. Please contact JTM using the contact details provided below.

f. RIGHT TO DATA PROCESSING

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another Data Controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to JTM, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact JTM using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If JTM are unable to comply with your request due to an exception, it will be explained to you in the response you receive.

11. CONTACT

If you have any queries about this policy, the way in which Jarvis Training Management Ltd (JTM) processes personal data, or about exercising any of your rights, please send an email to;
info@jarvis-eu.com

Or

Write to the Data Controller, Data Protection, Jarvis Training Management Ltd, Hudson House, Southern Gateway, Speke Boulevard, Speke, Liverpool L24 9HZ.