

Learner Privacy Notice

1. What this notice covers

The Southampton Engineering Training Association Ltd. is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR) and data protection legislation.

It applies to all current and former individuals on Government funded Apprenticeship Standards or Commercial/Bespoke Learning programmes.

2. Identity of the DATA Controller

Southampton Engineering Training Association Ltd. is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

3. Categories of Personal DATA we process

We will collect, store and use the following categories of personal information about you:

Learners on Government funded Apprenticeship Standards

- *Personal contact details such as name, title, addresses, telephone numbers, personal email addresses; date of birth; gender; marital status and dependents*
- *Next of kin and emergency contact information*
- *National Insurance number*
- *Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)*
- *Employment records (including terms and conditions of employment, work history, working hours, training records and professional memberships)*
- *Performance information including class reports, progress reviews and performance improvement plans*
- *Details of any disciplinary and grievance proceedings you have been involved in*
- *Details of any leave you have taken, including holidays, sickness, family and parental leave.*
- *CCTV footage*
- *Information about your use of our information and communications systems*
- *Digital media recordings (Photographs, video recordings and audio recordings)*
- *Information about your race or ethnicity, religious beliefs and sexual orientation*
- *Information about your health, including any medical conditions, health and sickness records and details of any disability for which we may need to make reasonable adjustments*
- *Information about criminal convictions and offences*
- *Employer details*

Learners on Commercial/Bespoke Commercial Learning programmes

- *Personal contact details such as name, title, addresses, telephone numbers, personal email addresses; date of birth; gender; marital status and dependents*
- *Next of kin and emergency contact information*
- *National Insurance number*
- *Course entry requirement information (Certificates of prior learning, CV or cover letters)*
- *Performance information including class reports, progress reviews and performance improvement plans*

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- *Details of any disciplinary and grievance proceedings you have been involved in*
- *CCTV footage*
- *Information about your use of our information and communications systems*
- *Digital media recordings (Photographs, video recordings and audio recordings)*
- *Information about your race or ethnicity, religious beliefs and sexual orientation*
- *Information about your health, including any medical conditions, health and sickness records and details of any disability for which we may need to make reasonable adjustments*
- *Employer details*

4. Sources of Personal DATA

We collect personal information about you through the application and recruitment process, either directly from you or from your employer. We may sometimes collect additional information from third parties such as prior learning and your education history.

5. Our lawful bases for processing your DATA

We will use your personal information in the following circumstances:

- *Where we need to perform the contract we have entered into with you*
- *Where we need to comply with a legal obligation*
- *Where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests*

6. Our purposes for processing your DATA

- *Registration and Certification purposes*
- *Making a decision about Apprenticeship suitability*
- *Making a decision about Qualification suitability*
- *Administering the contract we being entered into*
- *Gathering evidence for possible grievance or disciplinary hearings*
- *Making arrangements for the termination of your relationship with SETA*
- *Education, training and development requirements*
- *Dealing with possible legal disputes involving individuals, including accidents at work*
- *Managing sickness absence*
- *Complying with health and safety obligations*
- *To prevent fraud*
- *To monitor an your use of SETA's our information and communication systems to ensure compliance with our IT policies*
- *To ensure network and information security, including preventing unauthorised access to SETA's computer and electronic communications systems, including preventing malicious software distribution*
- *To conduct data analytics studies to review and better understand Learner retention rates*
- *Equal opportunities monitoring*
- *Displaying digital media recordings and any reproductions in SETA's printed and online publicity, social media, press releases, funding applications or other purposes to help achieve SETA's aims*

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

7. Who has access to your DATA

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Recipients of your data may include third-party service providers (such as Awarding Bodies, Awarding Organisations and Government Agencies), other related business entities such as Government Organisation for funding and education cataloguing purposes, a regulator or to otherwise comply with the law.

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Where we do so, we will require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

8. Security of your DATA

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. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. How we decide how long to retain your DATA

We will only retain your 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

10. Your rights

You have the right to:

- **Request access** to, and a copy of, your personal information
- **Request correction** of the personal information that we hold about you
- **Request erasure** of your personal information.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

If you believe we have not complied with your rights, you can complain to the Information Commissioner.

11. What if you do not provide personal DATA?

If you do not provide personal data, it is likely to be impossible for the Southampton Engineering Training Association Ltd. to enter into a training and Assessment relationship with you.

12. Changes to this Privacy Notice

The Southampton Engineering Training Association Ltd. reserves the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

13. Contact

Please contact us if you have any questions about our privacy policy, wish to submit a subject access request, an erasure request, would like your details updated via:

- **Post:** *The DATA Protection Officer, Southampton Engineering Training Association Ltd, First Avenue, Millbrook, Southampton. SO15 0LJ*
- **E-mail:** dataprotection@seta-training.co.uk