# **Privacy Policy**

## **Purpose**

Thrive gathers and processes personal information in accordance with this privacy notice and in compliance with the relevant General Data Protection Regulation (GDPR) and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

#### Who we are:

Thrive-skills ltd is a private Training Provider delivering a range of qualifications to Adults who are 19+.

Registered office: Suite 2 The Old Foundry, Walsall WS1 3BZ

Company Registration No - 6403777

UKPRN No. - 10023898

#### Information that we collect

Thrive-skills ltd processes personal information to meet our legal, statutory and contractual obligations and to provide learners our products and services. We will never request any unnecessary personal data and will not process information in any way, other than as specified in this notice.

All data collected will be for legitimate business interest and to satisfy the requirements of funding bodies and Awarding Organisations.

Information we collect and process (this is not a limited list):

- Full Name
- Current Address
- Age
- Sex
- Ethnicity
- Telephone Contact details
- Employment status

- Medical information
- Email contact details
- General disabilities/learning difficulties/mental health/vulnerabilities information
- DOB
- National insurance number
- Next of kin/Emergency contact details
- Educational history

# How we use your personal data

Thrive-skills ltd takes your privacy very seriously and will only share your information with third parties where there is a legitimate business interest. If you engage with Thrive-skills as a user of our website, your data will not be shared with any third party.

If you are a learner on a Thrive-skills course, then we may need to share your data with:

- Funding organisations (ESFA, Student Finance England)
- Data Management and Education Systems (Pellcomp, SmartAssessor, Gsuite, Pass Functional skills, Equal, Impact share, share point)
- Awarding organisation(s) as appropriate to your programme (Innovate, VTCT, OCR, Focus Awards, Pearson etc.)
- Federation for Industry Sector Skills and Standards (Skills CFA, Skills For Care)

We will never disclose, share or sell your data without your consent unless required to do so by law. We only retain your data for as long as necessary and for the purpose(s) specified in this notice and other guidance provided by Thrive-skills.

The purposes and reasons for processing your personal data are detailed below:

- Funding regulations (SLC, ESFA, AO)
- Certification of your course (AO)
- Improve and implement changes to services (Thrive)
- Research and statistical purposes (Thrive)

### How long do we keep data?

Thrive-skills ltd only retains personal information for as long as necessary, and we have strict review and retention policies in place to meet these obligations. Once you have finished your qualification, your data is safely archived but is still accessible if needed. Our policy is to keep data for a minimum of 6 years, depending on funding regulations and awarding body retention policy, after which time it will be destroyed.

### Sharing and disclosing personal information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

## Will I be contacted for marketing purposes?

We will not share your details with any marketing organization. We will only send you emails/SMS messages informing you of other courses we offer if you have provided consent to receive such emails/SMS messages.

### **Your rights under the Data Protection Regulations**

- You have the right to be informed of any information Thrive-skills processes and why we are processing this information
- You have the right to access any personal information that Thrive-skills holds about you
- If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information, and we will strive to do so within 20 working days; unless there is a valid reason for not doing so, at which point you will be notified. Thrive-skills will also advise any third parties holding your data to update as notified.
- You have the right to have data erased. However, in doing so, Thrive-skills may not be
  able to continue to provide the expected service delivery. At your request, data will be
  erased within 20 working days.

#### You have the right to restrict processing of your personal data when:

- The accuracy of the data is contested (for a period of time to enable the controller to verify the accuracy)
- The processing is unlawful and you object to the sharing of data and request restrictions
  of its use
- You object to processing based on the grounds of legitimate business interests

 You have the right to data portability allowing you to obtain and reuse your personal data for your own purpose across different services.

# You have the right to object to:

- Direct Marketing, which is absolute. You do not need to demonstrate grounds for your objection, and there are no exceptions which will allow processing to continue
- Processing based on legitimate interests or performance of a task in the public interest/exercise of official authority
- Processing for research or statistical purposes.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request. This is to ensure that your data is protected and kept secure.

Please note: Thrive-skills does not participate in automated decision-making or profiling.

# Thrive-skills will always advise:

- Why we require your data
- With whom your personal data may be shared
- How long we intend to hold your data for and means of storage and disposal
- If we did not collect the data directly from you, information concerning the source.

### Safeguarding measures

Thrive-skills takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure, or destruction and have several layers of security measures in place, including:

- Full live network protection through our firewall
- Full antivirus scanning across all systems
- Lockable filing cabinets with key-controlled access
- Password-protected electronic data
- Restricted access to personal information
- Two-step authenticator

# To make a complaint

Thrive-skills only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to make a complaint with the supervisory authority.

Make the complaint in the first instance to:

Ian Shephard; Data Controller

Contact details: <a href="mailto:lan.shephard@thrive-skills.com">lan.shephard@thrive-skills.com</a>

Call: 01922661066

Report a concern:

Information Commissioner's Office (ICO) – Supervisory Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SKP 5AF

Telephone: 0303 123 1113 Website: www.ico.org.uk

**Changes to Thrive-skills Privacy Policy** 

This Privacy Policy will be updated from time to time. You are requested to review it whenever you are asked to provide us with information.