

## Estio Privacy Policy

This privacy notice provides you with information as to how Estio Training Limited collects, handles, stores, processes, and protects personal information. This notice also contains information about your rights, and how you can contact us if you have any questions on how we handle your information.

### What is the purpose of this Privacy Policy?

Estio respects your privacy and is committed to protecting your personal data. The aim of this Privacy Policy is to give you information on how Estio collects and processes your personal data through:

1. your use of Estio websites or apps, including any data you may provide through Estio websites/apps when you make an enquiry whether on behalf of yourself; as an employer client; or as a third party;
2. your registration for, purchase of or use of any Estio products and/or Services (including but not limited to courses, programmes or study materials (in any medium));
3. your use of any Estio social media channel; and
4. the provision of personal data to Estio by any other means.

This Policy will also inform you of what we do with personal data, how we look after personal data and tell you about your privacy rights and how the law protects you.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

## Who we are

### Data controller

In this privacy notice, references to "**we**" or "**us**" or "**our**" and "**Estio**" are to Estio Training Limited. Estio is a 'data controller' which 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 applies learners, candidate apprentices, employer clients, visitors, including website users, current and former employees, and contractors.

## Contact details

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact our data protection officer (DPO) using the following details:

FAO of the Data Protection Officer  
BPP Professional Education Group (or select the relevant BPP entity)  
Legal Team  
1 Portsoken Street  
London  
E1 8PH  
Email: [Dataprotection@bpp.com](mailto:Dataprotection@bpp.com)

You have the right to make a complaint at any time to:

- the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk))
- the Office of the Data Protection Authority, the supervisory authority for data protection issues in Guernsey ([www.odpa.gg](http://www.odpa.gg)); or
- the Jersey Office of the Information Commissioner, the supervisory authority for data protection issues in Jersey ([www.jerseyoic.org](http://www.jerseyoic.org)).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO (or other relevant authority) so please contact us in the first instance.

## Important information about this policy

### Changes to the Privacy Policy and your duty to inform us of changes

This Privacy Policy sets out your rights under the Data Protection Act 2018 and the UK General Data Protection Regulation.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We keep this Privacy Policy under review and may update it from time to time.

### If you reject the terms of this Privacy Policy

If you do not agree to your personal data being used in accordance with this Privacy Policy, please do not submit your personal data to us through the Website, apps or any other means.

### Third-party links and products

The Website (and apps) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our Website or app, we encourage you to read the privacy

policy of every website you visit.

Programmes may require learners to be directed to use third party platforms. We do not control these third-party platforms and are not responsible for their privacy policies or responsible for personal data which may be transferred by you to such third parties. When using these platforms, we encourage you to read their terms of use and privacy policy.

## Your personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Audio / Visual Data** includes recordings from closed circuit television systems which are in place at some of our premises for security purposes; telephone recordings (for monitoring and training purposes) where you call any of our student advice or sales teams (although not all calls to Estio are recorded); photographs of you for use on ID cards or to be used on registers/your online accounts so Estio staff (such as tutors or exam invigilators) can identify you; audio/video recordings of meetings with Skills Coaches or other performance/progress calls on courses or programmes (although not all of these types of calls are recorded); recordings (including video, audio and text) where any lecture, seminar, webinar or other interactive teaching session is recorded; video recordings from recorded exams/assessments (including mock exams/assessments); and any video recordings from any recorded interviews (such as prospective apprentice candidates).
- **Contact Data** includes billing address, delivery address, postal address, email address and telephone numbers.
- **Eligibility Data** includes education/academic history, records of qualifications and/or training, personal statements and references. For apprentices this will also include national insurance number.
- **Employment Data** (this is relevant where your place on a course or programme is sponsored by your employer/future employer) includes name of employer, job title, line manager name and contact details, work contact details (email address, telephone number and postal address), National Insurance number and employment start and end dates (and for apprentices may include hours of work).
- **Financial Data** includes bank account, billing information and payment card details.
- **Identity Data** includes first name, maiden name, last name, student ID number, usernames for Estio sites (including Estio's Learning Management System, Virtual Learning Environment, Hubstio, Cascade) other online platforms (including Microsoft Teams), Estio IT accounts (including Estio emails), or similar identifiers, marital status, title,

date of birth and gender. It may also include copies of identification documents (such as a passport, drivers licence or national identity card) which are used to confirm your identity in assessments (including online assessments).

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Next of Kin Data** includes the name and contact information of a friend or relative to be used in the event of an emergency involving you. It may also include details of relatives you have authorised to communicate with Estio on your behalf or attend Estio events with you, such as graduation ceremonies.
- **Profile Data** includes your usernames and passwords (for Estio platforms), purchases or orders made by you, your interests, preferences, feedback, reviews, survey responses and enquiries submitted to Estio.
- **Recruitment Data** includes any information you have provided to us (or through a third party such as Job Train, Zellis, Indeed, My First Job, LinkedIn or a recruitment agency) in your curriculum vitae, any covering letter, any application form (including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and reasons for wanting to apply for the relevant position) and any information you provide to us during an interview.
- **Student Data** includes the course or programme you are studying with Estio, your years of study, records of achievements on the course or programme (exam, assessment and mock results), exam scripts, exam transcripts, attendance and progress information, feedback from lecturers or personal tutors (including student references), emails sent by you to Estio, emails sent/received by you to or from your Estio email address or messages posted on any forums or message boards (including on Teams), information relating to your involvement in Estio's apprentice network, information relating to your involvement in Estio's alumni network, information relating to your registration for or attendance at any Estio hosted/advertised events, information relating to allegations of academic misconduct or other matters of discipline, information relating to any application for mitigating circumstances or an academic appeal, any application for deferrals or interruption of studies and any complaints made by you or about you to Estio.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the website.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Usage Data** includes information about your visit to a Website or Estio app, through and from the Websites or apps (including date and time), products and/or services you viewed or searched for, page response times, download errors, lengths of visits to certain pages, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page and any phone number used to call our customer services

numbers.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

### **Special Categories of Personal Data**

The law requires that “special categories” of particularly sensitive personal information require higher levels of protection than other personal data.

In some circumstances we may also collect, store and use the following “special categories” of more sensitive personal information:

- **Information about your race or ethnicity** – this information is collected for equality and diversity monitoring purposes. We also collect this information on behalf of the Education and Skills Funding Agency in relation to apprenticeship students.
- **Information about your gender identity** – this information is collected for equality and diversity monitoring purposes.
- **Information about your sexual orientation** - this information is collected for equality and diversity monitoring purposes.
- **Information about your religious beliefs** - this information is collected for equality and diversity monitoring purposes.
- **Information about your nationality and immigration status** – 1) this information is required to ensure right to work in the UK and right to study in the UK. Accordingly, we will collect information such as copies of passports, copies of visas and any relevant correspondence between you and the UK Visas and Immigration department of the Home Office.
- **Information about any disabilities or learning needs** – 1) this information is collected so that any reasonable adjustments can be made to accommodate students with disabilities (for example large print learning materials or exam papers) and also to ensure that any learning needs are supported (for example extra time in exams). This information is voluntary but Estio will not be able to provide you with learning support/reasonable adjustments if you do not provide this information.
- **Medical information** – this information may be collected where a medical issue is having an impact on your studies and or/work with Estio (for example, you may have a prolonged

period of absence; or you make an application for an interruption of studies where an illness is preventing you from studying; or where a medical issue has affected your performance in an exam, you may make an application for mitigating circumstances) or if an incident occurs whilst on an Estio site and such information is required for health and safety reporting. It may also include dietary requirements where you are attending a catered Estio event. This information is voluntary.

- **Information about criminal convictions and offences** – this information will be collected where it is a legal requirement of the course or programme applied for (for example all student nurses must undergo an enhanced criminal records check in accordance with safeguarding legislation). You will be informed if the course or programme you are applying for requires a criminal records check and be given the chance to withdraw your application should you not agree to such a check being undertaken.

In addition, we will also ask you to provide confirmation of whether you have any unspent criminal convictions as part of the application process. Any declaration will not be an automatic bar to your application but Estio will have to evaluate the details of such conviction for two reasons. Firstly, to ensure there is no threat to the safety of other students and staff at Estio and secondly to advise whether your conviction is likely to bar you from your chosen profession.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to enrol you onto a relevant course or programme or provide goods or services to you). In this case, we may have to withdraw your application or cancel/restrict a product or Service you have with us, but we will notify you if this is the case at the time.

## **How your personal data is collected**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact, Eligibility, Employment, Financial and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- a. apply for a course or programme;
- b. submit an online query or request a call back;
- c. purchase goods or Services from us;
- d. speak with one of our resourcing, onboarding and induction teams;
- e. speak with one of our client or supplier services teams;
- f. speak with your tutor or other teaching staff;
- g. create an account on our Website;
- h. download and use any Estio app;
- i. subscribe to a service or publication;
- j. subscribe, register, take part in or view any Estio webinar;

- k. are captured on closed circuit television when attending our premises;
- l. request marketing to be sent to you;
- m. enter a competition, promotion or complete a survey; or
- n. give us feedback.

**Through your Studies.** You may give us your Student Data throughout your time on a course or programme. This includes personal data you provide when you:

- a. attend lectures, seminars, webinars or other learning sessions (including where these are online);
- b. submit work for assessment (including mocks);
- c. take exams or other forms of assessment (including mocks);
- d. submit any applications or complaints relating to your studies (for example, mitigating circumstances applications);
- e. raise any issues or questions with your lecturer / personal tutor; or
- f. contact one of our student advice teams for support.

**Automated technologies or interactions.** As you interact with our Website or apps, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

**Third parties.** We may receive personal data about you from various third parties as set out below:

- Identity, Contact, Transaction and Student Data from any third party survey/review organisation or portal provider, such as SurveyMonkey, Eventbrite and TrustPilot.
- Data relating to criminal convictions and offences from the Disclosure and Barring Service (and any umbrella body company used to access DBS checks including Agenda Screening Services).
- Technical Data from analytics providers such as Google, Sessioncam, Hotjar and Optimizely.
- Identify and Contact Data from advertising networks; and search information providers (such as Companies House or LinkedIn);

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent.
- Where we are relying on your consent as a legal basis for processing your personal data, for example where we collect voluntary “special category” personal data (as set out in this

Policy above) you may withdraw your consent to this processing at any time by contacting us.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<b>Students or prospective students</b>		
To respond to enquiries or requests for information	a. Identity b. Contact	<ul style="list-style-type: none"> <li>• Performance of a contract with you; or</li> <li>• Consent</li> </ul>
To assess your eligibility to be enrolled onto a particular course or programme with Estio	a. Contact b. Eligibility c. Employment* (if sponsored by an employer) d. Identity e. Audio/Visual	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To recruit you for apprenticeships with Estio's selected employer clients	a. Recruitment	<ul style="list-style-type: none"> <li>• Consent; or</li> <li>• Necessary for our legitimate interests (to recruit apprentices/trainees for our employer clients)</li> </ul>
To review and process any application you make for a position or post within Estio including: <ul style="list-style-type: none"> <li>• to create a student club or society, or become a member of the Exec Committee for such club or society</li> <li>• to join BPP's Pro Bono programme as a student adviser</li> <li>• to be a Committee Member of BPP's Student Association</li> <li>• to be a student mentor</li> <li>• In response to any vacancy advertised via the Resourcing Team</li> </ul>	a. Identity b. Contact c. Recruitment d. Student	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
To register/enrol you as a student with Estio	a. Contact b. Eligibility c. Employment* (if sponsored by an employer) d. Identity	<ul style="list-style-type: none"> <li>• Performance of a contract with you; or</li> <li>• *Necessary for our legitimate interests (to deliver services to your employer under a contract in place between Estio and your employer)</li> </ul>



To deliver the course or programme to you (including the delivery of events)	a.Audio/Visual b.Contact c. Identity d.Profile e.Student	<ul style="list-style-type: none"> <li>• Performance of a contract with you; or</li> <li>• *Necessary for our legitimate interests (to deliver services to your employer under a contract in place between Estio and your employer)</li> </ul>
To participate in surveys or similar research and analysis exercises undertaken by governmental or other agencies (including but not limited to the Department for Education, Higher Education Funding Council for England, the Office for Students or the Higher Education Statistics Agency) (or any successor body to them) or by third parties engaged by such bodies.	a. Identity b.Eligibility c. Student	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how students use our services, to develop them, to grow our business and to inform our strategy)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<b>Clients of estio (including employer clients)</b>		
To register you as a client of Estio	a. Identity b. Contact	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To process and deliver the service: <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> <li>• Keep records for audit/accounting purposes</li> <li>• Defend any legal claims brought against Estio</li> </ul>	a. Identity b.Contact c. Financial d.Transaction e.Marketing and Communications	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us or defend legal claims)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<b>Suppliers to Estio</b>		
To register you as a supplier of Estio	a. Identity b.Contact	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To process and receive goods/services: <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Keep records for audit/accounting purposes</li> <li>• Defend any legal claims brought against BPP</li> </ul>	a. Identity b.Contact c. Financial d.Transaction e.Marketing and Communication	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us or defend legal claims)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<b>For All</b>		
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or policies</li> <li>• Asking you to provide a review or take a feedback survey</li> </ul>	a. Identity b.Contact c. Profile d.Marketing and Communications	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>

To enable you to partake in a prize draw, competition or complete a survey	a. Identity b.Contact c. Profile d.Usage e.Marketing and Communications	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
To administer and protect our business and our Website or apps (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b.Contact c. Technical	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To deliver relevant Website or apps content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a. Identity b.Contact c. Profile d.Usage e.Marketing and Communications f. Technical	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
To use data analytics to improve our Website or apps, products/services, marketing, student/ customer/client relationships and experiences	a.Technical b.Usage	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website or apps updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To make suggestions and recommendations to you about goods, services or events that may be of interest to you	a. Identity b.Contact c. Technical d.Usage e.Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

### How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<b>Students or prospective students</b>		
To confirm that you have the correct immigration status to be enrolled as a student with Estio	Data relating to nationality and immigration status (copies of passports and visas)	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Complying with our legal obligations to the UK Home Office</li> </ul>
To provide reasonable adjustments to students with disabilities and to provide learning support to students who have learning needs	Data relating to disabilities and/or learning needs	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Complying with our legal obligations (under the Equality Act 2010)</li> <li>• Your explicit consent (this information is voluntary)</li> </ul>
To: <ul style="list-style-type: none"> <li>• Monitor periods of absence*</li> <li>• Deal with applications for mitigating circumstances or academic appeals</li> <li>• Deal with applications for interruptions of study or deferrals</li> <li>• Confirm any dietary requirements for Estio catered events</li> </ul>	Medical data (may include doctors notes or medical records)	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Your explicit consent (this information is voluntary)</li> <li>• *Where it is a condition of a visa that a student must maintain a minimum attendance level, we will request medical data to justify any absence to avoid being in breach of our obligations to the UK Home Office.</li> </ul>
To minimise the spread of Covid-19 and safeguard students, staff and visitors.	Medical data (may include Covid-19 test results or information on vaccination status)	<ul style="list-style-type: none"> <li>• Public Task</li> <li>• Legitimate interests</li> <li>• Please see <a href="#">Covid-19 Monitoring and Reporting</a> for further information</li> </ul>
To carry out equal opportunities monitoring and reporting	Data relating to race and ethnic origin (and other special category personal data)	<ul style="list-style-type: none"> <li>• Your explicit consent (this information is voluntary)</li> <li>• It is in the public interest to process such data</li> </ul>

Less commonly, we may also process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent (for example if you suffer a medical problem whilst on Estio's premises).

### Consent

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations.

In limited circumstances (as set out above), we ask you for your written consent to allow us to process certain particularly sensitive data. When we do, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your contract/right to study with us that you agree to any request for consent from us. However, we may not be able to provide you with certain services (such as learning support) if you do not agree to provide such data to us.

### **Information about criminal convictions**

We will only use information relating to criminal convictions or alleged criminal behaviour where the law allows us to do so. This can arise when it is necessary for us to comply with the law or for another reason where there is a substantial public interest in us doing so. Less commonly, we will, if necessary, use information relating to criminal convictions or alleged criminal behaviour where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will only collect information about criminal convictions or allegations of criminal behaviour where it is appropriate given the nature of the role and where we are legally able to do so.

We will use information about criminal convictions/allegations and offences in the following ways:

- Cross-refer to relevant policies/processes/vetting procedures] [We are allowed to use your personal information in this way where it is in line with our data protection policy and where one of the following reasons arises:
- Where we need to carry out our legal obligations or exercise our legal rights;
- Where it is substantially in the public interest to do so and necessary for performing our functions as an Apprenticeship Training Provider.

### **Automated decision-making**

We do use automated technologies and decision-making when deciding what marketing messages you receive. However, we do not envisage that any other decisions will be taken about you using automated means, however we will update this Policy if this position changes.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Your marketing opt-in preferences will be collected when you register, book a course/programme or submit an enquiry through the website. You can opt out of receiving marketing at any time by replying to the sender of the marketing communication with the word "UNSUBSCRIBE".

If you do not agree to receive marketing from us, but change your mind at a later date, you can contact us and update your marketing preferences.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, Services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or Services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Third party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the Estio group of companies for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by logging into the preference centre and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of you entering into a contract with us.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Data Sharing**

We will in some circumstances have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

We will share your personal information with third parties where required by law, where it is

necessary to administer the working relationship with you; where it is in the public interest to do so or where it is necessary for the performance of our functions as an Apprenticeship Training Provider. This will, in some circumstances, involve sharing special categories of personal data and, where relevant, data about criminal convictions/allegations.

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within Estio Training. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT Services, security vetting, expenses processing, Recording of Health and Safety and accident records. The following third-party service providers process personal information about you for the following purposes:

- BPP Education Group (Estio Training is owned by the BPP Education Group)
- Southalls (Health and Safety)
- Disclosure and Barring Service
- VHost Limited
- Education and Skills Funding Agency/Department of Education (DfE)
- Awarding Bodies, British Computer Society (BCS), City & Guilds,
- OneFile portfolio system
- eLMS portfolio system
- PICS Learner Data handling systems
- The Office for Standards in Education (Ofsted)

All of our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will share your personal information with other Estio Training parties as part of our regular reporting activities on departmental performance, in the context of a business reorganisation or restructuring exercise, for system maintenance support and hosting of data; business planning/talent management initiatives, succession planning, statistical analysis; and the general management and functioning of Estio Training.

If required, we will need to share your personal information with a regulator such as Ofsted or to otherwise comply with the law.

### **Learning Management Systems, PICS and Virtual Learning Environment**

Estio provides an online learning experience to students and to selected sponsoring employers through eLMS and the Virtual Learning Environment ("VLE"). These online learning platforms are also accessed by Estio staff in order to deliver courses and programmes to students. Within the platforms the following data sharing is in operation:

- Your name and course or programme
- You may also elect to share your photo, a short biography and personal email address with other users (this is voluntary).
- Your participation in online sessions (such as webinars, online teaching, forums)

or chatrooms), including your text, audio or video content may be recorded and shared.

- The platforms may plug in to other software/platforms used by Estio (such as Go1 Learning) where these platforms/software are used to provide training or assessment services to you.
- Third Parties chosen by Estio may review your interaction with the platforms to help BPP continuously improve the service.
- Exam or assessment results in the platforms may also be combined to derive benchmarks of performance to allow students to assess their performance in their chosen programme. These will only be presented in aggregate and individual results will not be disclosed.
- Any assignment or assessment uploaded or completed through the platforms will be shared with the appropriate Estio staff for the purposes of assessment.
- Platform data relevant to assessing your progress within the course or programme may also be shared with your sponsoring employer or third party tuition provider.

## Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Your personal data may be held on the IT system of Estio (e.g. for the purpose of providing training or educational services to you) and/or on the IT system of another third party company (within or outside of Estio) within or outside the UK which is providing IT hosting or other data processing services, in accordance with Estio's arrangement in place with that company.

All information that you provide to us is stored on secure servers.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Websites or apps, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Data retention

We will only retain your personal data 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. We may

retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your legal rights

### Your duty to inform us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. *Please be aware that this right does not apply to exam scripts or exam marks.*
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. *Please be aware that this right does not apply to exam scripts, recorded assessments or exam marks.*
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and



- freedoms. *Please be aware that this right does not apply to exam scripts, recorded assessments or exam marks.*
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. *Please be aware that this right does not apply to exam scripts, recorded assessments or exam marks.*
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.