

## Customer Privacy Policy

### Induction

Portal Training takes the privacy of our customers and stakeholders very seriously and is committed to protecting the personal information that they share with us through our business activities and fair and transparent processing. The Privacy policy sets out the way the company will manage and secure the personal data that is supplied to us by our customers and stakeholders.

Please read this policy carefully as it contains information on the following;

- Who is Portal's Data Controller/Data Protection Officer and their contact details
- The information we collect about you
- How we will use your information
- Our legal/contractual basis for progressing your data
- Who receives your information
- Where your information is stored and how it is kept secure
- Any transfers to 3<sup>rd</sup> countries and safeguards in place
- How long your information will be held
- Your rights
- How to make a complaint to us and our supervisory authority

### Who are we?

For the purpose of the General Data Protection Regulations (GDPR) Portal Training acts as the processor and controller dependant on the business area.

Portal Training is a bilingual training company that offer fully funded and privately funded training programmes.

If you have any queries about this policy, how

- we use/process your personal data
- to exercise your rights with regards to rectifying data, erasing data,
- your right to object,
- your right to restrict progressing,
- your right to access and/or your right to data portability.

then please email us at [clare.jeffries@portaltraining.co.uk](mailto:clare.jeffries@portaltraining.co.uk) or write to us at the following address:

Data Protection Officer  
Portal Training  
Ocean Park House  
East Tyndall Street  
Cardiff  
CF24 5ET

### **What information do we collect?**

In providing you with our services we will collect and store any personal information that you provide to us. We will keep a record of the following information in relation to your personal data;

- Your name
- Address
- Date of birth
- Email address
- Telephone number
- Payment details ([where applicable](#))
- Disability, additional learning needs or health requirements (in order to provide our services).

When you interact with the company's

- digital platforms
- create an online account
- register to receive marketing communication from us
- fill in one of our forms online or offline or directly provide us with your personal information

we may collect and store any personal information that you provide. We may use this information to provide services you request from us to carry out profiling and/or statistical research.

### **Why do we collect your information?**

We collect information to enable us to provide our services to you as a customer or as a stakeholder of the company. All personal information you provide us with will be recorded, used and protected by us in line with relevant data protection legislation and GDPR.

In general, we will use your information for the following purposes:

- To administer and provide services you request or have expressed an interest in
- For internal record keeping and progress tracking against the services we provide

- We will share this information with Welsh Government and other public bodies, to carry out the funding, planning, monitoring and inspection of learning, and to produce statistical publications.
- With awarding organisations in order to administer the delivery of learning programmes
- To communicate with you about the services you request or express an interest in
- To personalise and/tailor any communications that we may send you.
- To gather feedback on our services
- For profiling purposes to assist with statistical research

Welsh Government and Lead Providers will also use your information in the following ways;

- By selected third parties, including social research organisations, to carry out research, analysis or equal opportunities monitoring relating to education and training.
- By the Lead Providers, Welsh Government and third parties acting on its behalf, to assist in linking your records to other data sources for the purpose of statistical research.
- The Welsh Government may share your name, date of birth, address and postcode with electoral registration officers taking part in data matching pilot schemes to improve the accuracy of electoral registers.
- Your contact details may be passed on to contractors acting on behalf of the Welsh Government (including the Wales European Funding Office), to undertake interviews or surveys of current and former learners, as part of formal evaluations of Welsh Government-funded programmes. Contractors will contact a sample of individuals. You may be contacted and asked to take part in an evaluation of your personal experience of a learning activity. If you are contacted, the purpose of the interview or survey will be explained to you and you will be given the option to say yes or no to taking part. Contractors will use your details only for the purpose of carrying out the evaluation and in accordance with the Data Protection Act and GDPR. Your details will then be deleted once the evaluation contract is complete.

We may also share your information for legal reasons if we believe in good faith that access, use, preservation, or disclosure of the information is necessary to:

- Meet requests from government bodies, law enforcement agencies in relation to any investigation to aide with the detection and prevention of any unlawful activity.
- Detect or prevent fraud, security or technical issues.
- Assist other third parties in legal proceedings

## **Marketing**

We like to keep our customers up to date with the products and services that we offer and to communicate opportunities which may be of interest to you. To enable us to do this you are required to opt in <https://www.portaltraining.co.uk/subscribe> click here.

You can opt out of receiving marketing information from us at any time. If you no longer wish to be contacted for marketing purposes, please click <https://www.portaltraining.co.uk/subscribe> here to opt out at any time.

## **How long do we keep your personal data?**

We will retain personal data in line with our contractual requirements. For learners that are Welsh Government funded we are contractually obliged to retain learner's data until 31/12/2031.

For learners that have privately/self funded their training programmes such as ILM Level 7 learners and/or DCF learners, data will be kept in line with awarding organisation guidance but of a minimum three years post your programme end date.

## **Where do we store your personal data and how is it protected?**

We take reasonable steps to protect your data. We have a range of procedures in place to deal with suspected security breaches. Further policies regarding how Portal manage Information Security are available on request.

## **The safety of your personal information**

We take the safety of your information extremely seriously and work hard to ensure that it is protected from unauthorised access. We have appropriate firewalls and protection in place on the databases holding your personal data and this information is only accessed in line with the company's Access Control Policy. In addition to this we have physical access controls in place within our buildings and access to your data is only given to those employees that need it to carry out their job role. Employees may be disciplined or their contract terminated if they fail to comply with these obligations.

We will not sell, distribute or lease your personal data with any third parties unless we have your explicit permission or we are required by law to do so.

You may request details of the personal data which we hold about you. You can do this by following Portals Access Rights Policy which can be made available. If you believe that any of the information we are holding about you is incorrect or incomplete, please write or email us as soon as possible using the contact details listed in the 'how to contact us' section of this policy.

## **Cookies**

As with many other websites, we utilise standard technology cookies on our website. A cookie is a small file which asks permission to be placed on your computer. These files help us analyse web traffic on each visit to our site. These cookies help us analyse data about our website and improve our website in order to ensure that we continue to meet the needs of

our customers. We only use this information for statistical analysis purposes and then the data is removed from the system.

You can choose to accept or decline these cookies through your web browser settings to decline cookies if you prefer, however this may affect your use of the website.

## Your rights

Under the GDPR, you have various rights with respect to our use of your personal data. These are listed below;

- The right to access the information we hold on you
- The right to rectify any information which we hold on you
- The right to request the deletion of your personal data that we may hold
- The right to object to the processing of your personal data
- The right to restrict the further processing of your data
- The right for data portability

To exercise any of these rights please contact Portal's Data Protection Officer noted within this policy.

## Complaints

If on any occasion you feel that your rights have been breached, and we have been unable to resolve your issue, you are able to log a complaint to the UK Information Commissioner's Office. For more information on this please visit <https://ico.org.uk>.

## Changes to our Policy

Please check our website regularly for any updates or changes to this policy. This policy will be reviewed at least annually.

## Opt in

<https://www.portaltraining.co.uk/subscribe>

