

INTEQUAL

Privacy Policy

Version 2.2

Ref – Privacy Policy

Issue: August 2023

Review: August 2024

**Approved by: Rod Harris
(Board Representative)**

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Our commitment

Intequal cares deeply about your privacy. For this reason, we collect and use personal data only for the purpose of us delivering a service to you, the “customer”.

Intequal will ask its learners or potential learners to “opt-in” to receive information about our products and courses. This means you’ll have the choice as to whether you want to receive these messages. You can choose not to receive information or to change how we contact you at any time.

The IT Skills Management Company T.A. Intequal (“Intequal”, “we”, “our” or “us”) is the controller for the personal information that we process when you:

- Visit our website, portals, or online learning environments (the “Website”).
- Use of educational services, testing, certification, or products (“Services”).

Objectives

Our Privacy Policy will describe to you what data we collect, and why we use your personal data. It also describes your rights, for example, to access, corrections, and deletion. At Intequal we ensure that you can take control of the personal data that we process.

Scope

This Privacy Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on our behalf. This policy applies to all Intequal employees.

Key contacts

General Enquires

enquiries@intequal.co.uk

023 92982490

Definitions

Keywords used in the policy and what they mean in relation to this policy:

Keyword	Definition
Data Protection Officer (DPO)	The primary role of the data protection officer (DPO) is to ensure that her organisation processes the personal data of its staff, customers, providers, or any other individuals (also referred to as data subjects) in compliance with the applicable data protection rules.
Personal data	Personal details (name, date of birth, email, address, telephone, education details etc.) when you sign up for an apprenticeship agreement.
Sensitive personal data	Data known as sensitive personal data (ethnicity, additional learning needs).

The information we collect

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have made an enquiry or application using our online forms, logged in to access our services, or signed up to receive vacancy notifications.
- You have attended an event and provided us with your information.
- You have subscribed to our marketing emails.
- You have applied for an apprenticeship with us.
- You have applied for a job with us.
- You are representing your organisation.

- You chose to provide us with information when you used our website or accessed our Services.
- You contacted us for any reason, including by email, postal mail, telephone, online chat, or text.
- When you used our services.

By submitting information to us you consent to the use of that information as set out in this Privacy Policy. We may also receive personal information indirectly through party third sources, such as your employer if you enrol on an apprenticeship with us. We may collect personal information from other third parties but will only do so where third parties have consent or are otherwise legally permitted or required to disclose your personal information to us. We only collect the minimum level of information required from these third parties to enable us to deliver the required service or process any application made. We only use the information sent to us by third parties in the ways set out in this Privacy Policy.

The use of your information

The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition to this, we may use your information for the following reasons:

- To provide you with services or information you request from us, this includes, but is not limited to our apprenticeship and commercial services.
- To provide information on other Intequal products and services that we feel may be of interest to you. This is done in accordance with your communication and consent preferences.
- To meet our contractual obligations to you.
- To act on behalf where third-party involvement is appropriate – for example through a third-party specialist training provider or awarding body.

- To obtain additional personal information used to secure funding or satisfy legal or Government scheme requirements.
- To monitor and analyse trends, usage, and activities in connection with our Websites/Services; and as necessary to prevent or detect crime.

In general, we will use the information we collect from you only for the purposes described in this Privacy Policy or for purposes that we explain to you at the time of data collection. However, we may also use personal information for other purposes we have disclosed to you (such as statistical purposes) if and were permitted by applicable data protection laws.

If you do not wish for us to use your data for any marketing purposes, you will have the opportunity to withhold your consent to this at any time.

As a part of Intequal's statutory and corporate functions, we do process special category data, also known as sensitive personal information. Examples of this include health-related information, or information about your race or ethnicity, which we need for statutory registration/reporting purposes, and to ensure that we can provide you with the necessary duty of care. Please read our GDPR policy.

Storing and retaining your information

The personal information you provide us with is stored within secure servers. We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Please note that the transmission of information via the internet (including email) is not completely secure and therefore, although we endeavour to protect the personal information you provide to us, we cannot guarantee the security of data sent to us electronically and the transmission of such data is therefore entirely at your own risk. We only retain information from you where we have an ongoing legitimate interest or contractual agreement to do so. For example, to provide you with a service you have

requested or to comply with applicable legal, tax or accounting requirements. Data will be stored securely for a maximum of 10 years to comply with our contractual obligations.

Disclosing your information

We may disclose your personal information, if we have the contractual obligation or legitimate interest, to any company within our corporate group. This includes, where applicable, our subsidiaries.

We may also disclose your personal information with:

- Third-party service providers and partners who provide data processing services to us. For example, to support the delivery of Services, or who otherwise process personal information for purposes that are described in this Privacy Policy
- Third-party funders, where required within Apprenticeships or further/higher education
- Your employer, where required within an Apprenticeship programme/Higher Education programme; or other
- Government agencies, where required by the scheme or education path you elect to follow
- Partners with whom we work to provide Services (such as course vendors, examination bodies and trainers)
- Any third party in connection with, or during negotiations of, any merger, sales of company assets, financing or acquisition of all or a portion of our business by another company
- Any law enforcement agency, court, regulator, government authority or other third parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party
- Any other person with your consent to the disclosure

Where you are a customer or prospective customer, we may disclose your data to third parties for our marketing purposes so that we can identify products and services we think you will be interested in. Personal data used in this way may include contact details such as name, address, phone number, and email address. When sharing with third-party marketing organisations, your data may be processed in countries inside or outside of the EU. This will only be completed with your consent and all third parties must follow the relevant data protection laws.

Third-party links and providers

Third-party links

You might find links to third party websites on our website or within the documentation we provide.

If you access other websites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their own privacy policies which you should review.

We do not accept any responsibility or liability for their policies or procedures.

Third-party providers

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

- i. Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>

Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io

Social networking

The Website may offer you the opportunity to share or follow information about us (or the Website or our Services) using third-party social networking functionality (such as through "share this", "like" or "follow" buttons).

We offer this functionality in order to generate interest in us, the Website and our Services among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about us with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly available, including through Internet search engines.

Please note that we do not exercise, endorse, or control the policies or practices of any third-party social network whose functionality you may access through the Website.

You should always read the Privacy Policy of any social network through which you share information carefully to understand their specific privacy and information usage practices.

What are cookies?

A cookie is a small file that is downloaded onto your computer or mobile device when you visit a website. Cookies are commonly used by website owners to make their websites work or to work more efficiently, as well as to provide companies with reporting information.

Cookies set by us are known as "first-party cookies". Cookies set by parties other than us are known as "third-party cookies". Third-party cookies enable third-party features or functionality to be provided on or through the website. For example, advertising, interactive content, and analytics. The parties that set these third-party cookies can recognise your

computer both when it visits the website in question and when it visits certain other websites.

Why do we use cookies?

The website uses cookies to improve your experience by remembering your preferences and gathering anonymous analytical information. Some cookies are required for technical reasons to allow our website to operate, and we refer to these as “essential cookies”. Other cookies also enable us to track and target the interests of our users to enhance the user experience within our website. For example, we may use third-party cookies such as Google Analytics within our website to monitor how users have landed on our website, and how they navigate it. This is done so that we can see aggregated (not individually identifiable) statistics about which content our users visit most frequently. These statistics do not include any information that can be used to identify any individual.

How can you control cookies?

You have the right to choose whether to accept cookies and to set your own cookie preferences on your computer.

These preferences can be to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at all. However, by opting not to receive cookies at any time, certain features of the website cannot be provided, and you may not be able to enjoy the website to its fullest. Web browsers are often different and to learn how to change your cookie preferences, click the “Help” menu of your browser.

Unless the user’s browser has been configured so that it will refuse cookies, our website will notify the user that the site makes use of cookies and allows the user to customise their browser to configure their preferences.

What cookies do we use?

We use session cookies therefore our cookies have a limited lifetime and are replaced when someone uses the website a second time. Therefore, cookies may only last a day before being replaced.

Your rights

Under the latest data protection law, The General Data Protection Regulation (GDPR) 2018, you have the following rights (these may vary depending on the lawful basis for processing your information):

- Your right to **access, rectify, update** or request the **erasure** of your personal information. You can do so at any time by contacting us using the details below.
- Your right to **restriction of processing** your personal information, or **object to the processing of personal information** can be exercised by contacting us using the details below.
- Your right to **data portability**, you can exercise this right by contacting us using the details below.
- You also have the right to opt out **of the marketing communications** we send you at any time. To do so press unsubscribe, which can be found at the bottom of all our marketing emails, or by contacting us using the details below.
- Your right to **withdraw your consent**, can be exercised at any time using the contact details below. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect information that we have to continue processing after your request due to contractual obligation or legitimate interest.

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

The above rights only apply to the information you have given us. The right only applies if we are processing information based on your consent, or you are in talks about entering into a contract and the processing is automated.

If we are processing your information for criminal law enforcement purposes or under our duty of care to you, your rights are slightly different. Please see the relevant section of the policy.

We work to high standards when it comes to processing your personal information and are regularly audited by regulatory organisations such as ESFA (Education & Skills Funding Agency) and Ofsted.

How we protect your information

The internet is not a secure medium. However, we have put in place various security procedures as set out in this policy. We take special care to ensure no information is made available to unauthorised people or sites. We also ensure all your information is kept confidential.

Sale of business

If this business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

Changes to this policy

Intequal review policies and subsequent documents will be published on our website annually. The policy issue and review date can be found in the footer of the document.

History

Version	Author	Change	Date
V2	Vini Pathmanathan	First version in new policy format	Oct 2023
V2.1	Abbie Hellyer	Annual renewal	11/08/2023
V 2.2	Vini Pathmanathan	DPO updated from AH to JC	07/12/2023