



**THE ACADEMY HAIR & BEAUTY LTD.**

**PRIVACY POLICY**

**2020/21**

The Academy Hair & Beauty Ltd. is committed to protecting our customer privacy and takes its responsibility regarding the security of customer information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website, and online services;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- And how we comply with the data protection rules.
- All personal data is collected and processed in accordance data protection laws.

### **What personal data we collect**

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, date of birth, National Insurance number. We may collect personal data from you when you enquire about one of our training courses and when you sign up to a provision (either directly or indirectly through our trusted partners). Specifically, we may collect the following categories of information:

- Name, home address, e-mail address, telephone number,
- Passport or other recognized personal ID card numbers and detail in order to check funding eligibility
- Personal information, which includes your name, nationality, date of birth, gender, National Insurance number
- Medical conditions for learners who have special medical requirements that may affect their learning
- Education history, including information related to qualifications achieved, information you provide about your place of employment
- The communications you exchange with us or direct to us via letters, emails, and social media.
- Personal details about your physical or mental health, alleged commission or conviction of criminal offences are considered “sensitive” personal data under applicable data protection laws.

### **What do we use your personal data for, why and for how long?**

Your data may be used for the following purposes:

- Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to your teaching ,learning and assessment
- Contacting you in the event of a change to your training programme, to discuss your progress and set work for you to undertake: we send you communications about the services you have asked for and any changes to such services. These communications are not made for marketing purposes and cannot be opted-out of;
- Administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, customer surveys, curriculum development, or in order to deal with a dispute or complaint. Note that we may perform data profiling based on the data we collect from you for statistical and marketing analysis purposes. Any profiling activity will be carried out with your prior consent only and by making best endeavours to ensure that all data it is based on is accurate. By providing any personal data you explicitly agree that we may use it to perform profiling activities in accordance with this Privacy Policy;
- Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;
- Customer Services communications: we use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us;
- Provide tailored services: we use your data to provide information we believe is of interest to you, prior to, during, and after your training with us and to personalise the services we offer to you.
- Marketing: from time to time we will contact you with information regarding courses or to promote our business. You will have the choice to **opt in or opt out** of receiving such communications by indicating your choice at the sign up stage.
- We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.

In most cases we will need to process your personal data so we can enter into our contract for teaching and learning with you.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation (eg immigration or customs requirements)
- You have consented to us using your personal data (eg. Marketing related uses);
- To protect your vital interests or those of another person (eg in case of a medical emergency)

- It is in our legitimate interests in operating as a training provider
- Only person's children aged 16 or over can provide their own consent.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. We have to retain funding documents for Education and Skills Funding Agency and training funded through European Social Fund for 7 years for the purpose of audit to determine how grant money was used.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of a claim being made.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

### **Security of your personal data**

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is protected using firewall technology. All of our IT equipment used by staff and learners is encrypted to ensure further security of sensitive data.

### **Sharing your personal information**

We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding learners, employers and with our business partners, trusted affiliates and advertisers for the purposes outlined above.

We may also share your personal data with the following third parties for the purpose described in this Privacy Policy:

- a. Government authorities, like Ofsted and the Education Skills Funding Agency

### **Your Data Protection Rights**

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **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.
- **Object to automated decision-making including profiling**, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **Withdraw consent.** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**Lindsay Burr MBE  
Academy Director  
October 2020**