

PRIVACY POLICY

1. Introduction

We are committed to protecting and respecting your privacy. If you need to contact us about any aspect of our Privacy Policy you can email the Industry Learning Solutions (ILS) data controller at: info@industrylearningsolutions.com or write to us at Industry Learning Solutions at Ty Gwenyn, Ethley Drive, Usk, Monmouthshire at any time.

Although our customers are businesses, not individuals, we do collect and use personal information relating to individuals in organisations as part of our activities. This is where we feel we have legitimate interest to contact individuals employed in businesses to advise on relevant promotions or information that may be of interest to them. We also collect personal information about individuals who register on our website, undertake surveys, or contact us at business to business events.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our client organisations, their employees, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations. This Policy is intended for clients, prospective clients, suppliers, users of our website and other third parties with whom we engage.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

2. Data protection principles

We will only process your data where we have legal grounds to do so. This means your personal information must be:

- processed lawfully, fairly and in a transparent manner;
- processed for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up-to-date;
- kept for no longer than is necessary; and
- processed in a manner than ensures appropriate security.

3. What Personal Data we may collect about you

For the purpose of legitimate interest Industry Learning Solutions Limited may collect, use and store, for no longer than is necessary, different kinds of personal information about you, including:

- Identity Data, such as your name, title, job title and your employer;
- Contact Data, such as your work addresses, contact email addresses, employer website and personal and work telephone numbers;
- Activities Data which means data relating to the activities of Industry Learning Solutions Limited (ILS Wales) that you participate in such as courses attended.

PRIVACY POLICY

- Transaction Data, including financial details about payments to and from you, and the details of services and activities that you pay for with Industry Learning Solutions Limited;
- Technical Data, such as your IP address;
- Any personal detail you post on our company website (www.industrylearningsolutions.com) or social media platforms which are Linked-In, Facebook and Twitter (ILS Wales).
- Any other information that you directly provide to us whether through our contact with you or otherwise, such as completing a survey;
- Marketing Data, such as your preferences in receiving marketing from us and our third parties, and your communication preferences;
- Photos of you at events;
- CV and application forms for job applied for through ILS;
- Credit information on your business or employer from third parties;

4. Children

ILS is a business-to-business organisation and our services and website are aimed at employers and developing the skills of their staff and apprentices over the age of 16 years and is not aimed at children. We support businesses with training, adult education, consultancy and information about the Apprenticeship Levy and skills or business guidance which supports businesses and accordingly we do not collect any data on children.

5. How we collect your personal information

We may obtain personal information by directly interacting with you, such as:

- meeting with you at your offices, at events or elsewhere;
- receiving information about you from other parties involved in transactions or discussions with you or who have sought to introduce you to ILS Ltd.
- Filling-in information request forms on our website;
- Participating in discussion boards, shared industry forums; Linked In groups and personal shared connections; Twitter following; or other social media functions through our website, www.industrylearningsolutions.com;
- giving us your business card;
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback;
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you; or
- correspondence with us by phone, email, letters or otherwise by yourself and other third parties.
- We DO NOT currently obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies. We will update our privacy policy in the future if this should change.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- your business colleagues and other contacts such as sub-contractors who work for us marketing Industry Learning Solutions Limited or helping us with events.
- Primes/Tier one supply chain/contract holders;

PRIVACY POLICY

- business networks with which both you and we are connected;
- advertising networks;
- providers of technical, payment and delivery services; and
- by conducting searches of publicly-available databases or social media sites, such as Companies House, Facebook, Twitter, and LinkedIn.

6. How we may use your personal information

UK data protection law sets the lawful legal bases (or 'conditions') which allow us to collect, hold and use your personal information. Industry Learning Solutions Ltd will use your information for the purpose of legitimate interest. We believe that we have a legitimate interest in being able to provide our services to organisations. As set out in this notice, this sometimes requires us to collect and use personal information about individuals.

- We only use this legal basis where these interests are not overridden by your interests and fundamental rights or and freedoms;
- where we have entered into a contract with you. In these circumstances, we may need to process your personal information in order to fulfil the contract. For example, this may apply if you or your employer books to attend one of our courses or apprenticeship programmes delivered by ILS or a third party;
- where we are under a legal obligation to process personal information. For instance, we are required to collect certain information in accordance with our obligations under equalities legislation;
- sometimes, we will ask you for your agreement to process your personal information. This is particularly the case when we wish to collect or use personal information to complete a transaction. For example, where your details will be passed to a third party to complete a training programme or to register with an awarding body or to pass to a government agency to obtain grant funding on your behalf.
- data protection law recognises certain "*special categories*" of personal information, which include information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership for uniquely identifying a person, information concerning health, and information concerning a person's sex life or sexual orientation;
- these special categories are considered particularly sensitive and so we will only collect this information if required by a third party and where you have given us your explicit consent. For example, when completing applications for college courses, government funded apprenticeships or other grant funded activity including European Funded programmes, you will need to reveal for the third party and government a great deal of additional special information such as DOB, personal address, qualifications, nationality. ILS only collect this information for a third party and do not retain copies on our files as ILS is not the contract holder for government skills funding.
- you may choose to tell us about your health condition before attending one of our training programmes but we will not retain this information.

7. We will only use 'special category' information:

PRIVACY POLICY

- provided we have your explicit consent to use it, for example, medical information that you have provided to us to facilitate your attendance at a skills-related event;
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent;
- where it is necessary for reasons of substantial public interest;
- where you have previously made that data public knowledge;
- if we need to use that data to establish, exercise or defend legal claims; or
- where there is some other legal basis that allows us to use that information.

8. How we may use your data

We may use your data to allow us to:

- carry out our activities as a business to business support organisation
- advise you or your organisation about training, programmes, skills, business services, events or offers that may be of interest

We may use information we hold about you in the following ways:

- to confirm your identity;
- to update the records we hold about your business/organisation including financial transactions and referrals;
- to let you know about other relevant services, both ours and those of our strategic partners whose products and services may be available to you – such as apprenticeships and funded training
- to develop, test and improve our systems
- to notify you about changes to our services
- to ensure the content of our website is presented in the most effective manner for you
- to administer our website, for internal operations and for testing
- keeping records of sources of new enquiries; and
- storage and archiving of files and documents.

We will only use your personal information for the purpose(s) for which we collected it. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, or where this is required or permitted by law.

9. Cookie policy

Our website currently use does not use cookies to distinguish you from other users of our website. This may change in the future and we will create a Cookie Policy at that time to advise how that information is used.

10. Data security

Most matters with which we deal, will have password protected computers, in password protected data bases and/or spreadsheets or on paper files stored in locked cabinets in our secure offices and remote server.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- Locked cabinets in a locked office only accessible by Industry Learning Solutions Limited;

PRIVACY POLICY

- Methods of disposal. Paper documents are disposed of by shredding in a manner that ensures confidentiality;
- Our employees are trained in the importance of data security;
- Electronic access. All data stored electronically is password-protected. Where we have provided an authorised user with a password, that user is responsible for keeping this password confidential and is not permitted to share the password with anyone;
- Payment details. We will send payment and banking details by BACS or Royal Mail

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data recorded on our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

11. Data retention

- We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
- We will generally keep personal information about you no longer than is needed for us to carry out the functions described in this notice. For example, we would normally retain your business cards for no longer than two years. However, we may retain other information (such as company name and contact information) for much longer where it is in our legitimate interests to do so.
- We will keep personal information held as part of our business activity for the duration of our ongoing relationship. It is a requirement of some institutions, such as the European Union or Welsh Government or ESFA, that we retain education transaction records about employees and their companies for up to 10 years. We will delete records which are dormant and only retain the minimum information necessary to deal with any future issues.

12. Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data, and (where the lawful ground of processing is consent), to withdraw consent:

- You have the right to access the information we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the '*right to be forgotten*'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the right to ask us to stop using your information where: the information we hold about you is inaccurate; we are unlawfully using your information; we no longer

PRIVACY POLICY

need to use the information; or we do not have a legitimate reason to use the information. Please note that we may continue to store your information or use your information for the purpose of legal proceedings or for protecting the rights of any other person.

- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information.
- We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which is more important than your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.

If you wish to exercise any of your legal rights, please contact us by writing to the address at the top of this policy, or by emailing us at: info@industrylearningsolutions.com

You can see more of these rights and at the UK Information Commissioner's Office (ICO) at www.ico.org.uk.

13. Contacting you and opting out of receiving marketing communications

An important part of our work is communicating with businesses to advise them of our activities and how we are supporting their skills and apprenticeship interests and seeking their views on current issues. To do so, we use personal information to keep in touch with individuals within our member organisations, as well as partners and other individuals.

- We will use the contact information you we have on our records to advise you about important information. This may be by post, social media, email, text message or telephone.
- We may also use the information we hold about you in order to provide you with information about other products or services we feel may interest you.
- Because we operate primarily with businesses rather than individuals, we do not generally seek your consent to send you marketing communications. We believe that such communications are both in our legitimate interests, to raise awareness of our work and promote our services, and in your interests. However, you do have the right to ask us to stop sending you marketing communications. If you would like to stop receiving these, please email us at info@industrylearningsolutions.com to update your preferences.

14. Automated decision-making

We do not use automated decision-making processes.

15. Third party links

PRIVACY POLICY

Where our website at www.industrylearningsolutions.com/links contains links to third-party websites these are provided because it is felt they will be of help to you. Clicking on those links on our website 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. If you are uncertain please contact us at info@industrylearningsolutions.com

If you are a business client, we may identify you as a beneficiary of our services or a collaborative partner in our marketing collateral or on social media, although we will never publicly disclose any confidential information about individual staff without having obtained their prior consent. If you do not agree to us identifying you as a beneficiary of our services or collaborative partner please notify us by email at info@industrylearningsolutions.com

16. Changes to our policy

Any changes we make to our policy in the future will be posted on our website and, if appropriate, notified to you by email or via social media.

17. Contact

TERMS AND CONDITIONS

Terms of Use

Please read the following terms (hereinafter referred to as the "Terms") carefully. They govern the use of our website www.industrylearningsolutions.com By using this site, you agree to be legally bound by the Terms.

Who we are

Your use of this site constitutes your acceptance of these terms and conditions, which take effect from the date that you first use this site. Industry Learning Solutions Limited (ILS) reserves the right to change these terms and conditions at any time by posting any changes on line. Your use of the site after any changes have been posted constitutes your acceptance of the modified terms and conditions.

Materials used on the site which include logos, page headers, custom graphics and photography belong to Industry Learning Solutions Ltd and cannot be used, copied, reproduced, republished, downloaded, broadcast or transmitted without prior written permission of ILS.

Any links to third party websites located on this Website are provided for your convenience and information. We have not reviewed each third-party website and as such have no responsibility for their content. We do not endorse the third-party websites or make representations about them or any material contained in them. If you choose to access a third-party website linked to from this Website, it is at your own risk.

PRIVACY POLICY

Industry Learning Solutions Ltd endeavours to ensure that all information and material on this web site is correct and accurate but does not accept any liability for errors or omissions.

Copyright Notice

The contents of this web site are the copyright of Industry Learning Solutions Limited. Reproduction of the contents, or any part of them, is prohibited except in compliance with the following permission:
You may not use or link the Industry Learning Solutions (ILS) logo without obtaining permission in writing from us

Limitation of Liability

This web site contains general information. We exclude all liability for loss or damage of any kind resulting in the use of this web site or any of the information, content, and documents distributed on this site. By using these web pages and that of our social media web-pages, you confirm that you have not and will not rely on any such content and accept the limitation of our liability as described above.

Use of this Site

You may not create a link to this site without our prior written permission. Your continued use of this site is confirmation of your acceptance of the Terms of Use.
