

## WTPN Privacy Notice

### Privacy Notice

Western Training Providers Ltd (Western Training Provider Network or WTPN) is a not-for-profit organisation committed to protecting your privacy and processing your information in a fair, lawful and transparent way.

This notice explains how we process the information we collect as part of our ongoing work to support members of the network, our stakeholders and those who use our services.

This notice was most recently updated on 1<sup>st</sup> October 2020 in line with the UK General Protection Regulation (“GDPR”)

The notice is split into four sections:

- 1 Information for members of the Network & Service users
- 2 Information for e-newsletter subscribers
- 3 Website Privacy Information
- 4 Information about your rights

#### 1. Information for Members of the WTPN

When we refer to ‘member organisation’ we mean the organisation that has joined the WTPN Network, has paid an annual membership fee, attends network meetings or other network events and utilises the services of the network.

When we refer to ‘member contact’ we refer to the individual people within that member organisation who have been registered as points of contact.

When we refer to service users, they are businesses and schools that have agreed to work with us on local and National Govt funded contracts

#### What information we collect and why

When an organisation joins the Network, we collect information about the organisations who have joined as members, for membership purposes. This includes:

- Name
- Organisation
- Job title
- Organisation address
- E-mail
- Telephone
- Organisation website
- Types of learning and training or service, geographical spread and sectors covered
- Twitter handle / Facebook page / LinkedIn profile
- Website URL
- Ofsted grading if relevant

#### How we use your information

If you are a member or service user contact with an organisation, we will:

Send you a regular mailing with a round-up of local and national Industry relevant news, information and opportunities from the Network and its member organisations  
Send you ad hoc e-mails with invitations for you and your colleagues to participate in relevant events and initiatives which the WTPN are delivering, supporting, or are associated with.

Notify you about any membership processes, updates or organisational changes from WTPN that relate to and/or may impact on your organisation's membership of the Network.

Contact you to ensure the information we hold for you is correct

Contact you to request feedback or invite your participation in bids or surveys for research purposes and to improve the services we provide.

On occasion we share and report on member organisation's information for research and communication with potential business customers and internal evaluation purposes.

On occasion we share and report on service users information with the relevant Govt body for internal evaluation purposes

We do publish a list of member's organisations on our website. You have the option to withdraw from this list at any point by e-mailing [westertrainingproviders@gmail.com](mailto:westertrainingproviders@gmail.com)

You can withdraw your consent to the WTPN newsletter at any time you choose by e-mailing [westertrainingproviders@gmail.com](mailto:westertrainingproviders@gmail.com) or by clicking the 'unsubscribe' link in the footer of any e-mail we send you.

From time-to-time we may use member organisation's and service users e-mail addresses or phone numbers to get in touch with contacts if we have any essential administrative queries regarding your membership or the service that they are using.

### **How we store your personal data and for how long**

We will store all membership information on an encrypted password protected laptop, kept securely at our employees home or at the WTPN office.

When a member contact or service user unsubscribes or moves on from their organisation, or we receive an e-mail bounce-back, their record will be deactivated and they will no longer receive membership communications. Information about their engagement with the Network will remain on the associated member organisation's account within our database for a period of no more than two years. After this point, individual information will be anonymised. We store this data for evaluation and reporting purposes only.

### **When we may share personal data**

#### Third party service providers

We rely on third-party service providers to perform some business operations on our behalf. In so doing, we may need to share your personal information with them. We provide our service providers with only the personal information they need to perform the services we request and we require that they respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your data for their own purposes and only permit them to process your personal data for specific purposes and in accordance with our instructions.

#### Funded services

Some services are fully or part-funded by third parties, often public bodies, under contract. Where we deem that one of these services is the most appropriate solution for your enquiry, your data will be passed to the relevant funder. Please refer to the privacy notice of the relevant funder for details of how they process your personal data.

Service

Privacy Notice

The Apprenticeship Support & Knowledge for Schools and Colleges programme (ASK)

[Department for Education](#)

West of England Apprenticeship Service (WEAS)

[The West of England Combined Authority](#)

**Lawful basis for processing data**

Our lawful basis for processing personal data is consent. Organisations freely ask to join the Network and individual's opt-in to become member contacts for that organisation by providing their consent for us to process their data for this purpose. Currently, this joining process is by e-mail. We have not and will never use any method of default consent to enable us to collect and process your personal information as a member contact with a member organisation. We have updated our online form privacy statement to provide more information about our data processing for new members at the point of joining.

Our lawful basis for processing and storing information about your engagement with the Network is legitimate interest – this processing is essential to the development of the company and the services we provide by helping us to understand how and to what extent both you and your organisation has engaged with the Network.

Anyone who is signed up to the Network and has paid their membership fee has the option to deactivate organisational membership, or deactivate individual involvement as a member contact, at any point. You can do this by clicking the link to 'Unsubscribe' on any e-mail you receive or e-mailing us directly at [westertrainingproviders@gmail.com](mailto:westertrainingproviders@gmail.com).

Please note that without at least one-member contact, an organisation's membership will become inactive.

Any individual can ask us to delete any personal data that we hold at any point during membership or within two years of deactivating a membership by sending a 'Delete personal data' request to [westertrainingproviders@gmail.com](mailto:westertrainingproviders@gmail.com)

## **2. Information for e-newsletter subscribers**

Our lawful basis for processing your data for the purposes of sending e-newsletters is consent.

These e-newsletters are sent at regular intervals and are intended to inform any interested individual about news, information and opportunities related to the Network and education and training nationally and regionally across the South West of England. They will include specific opportunities from the WTPN and those offered by its member organisations. Your consent for us to use your information in this way is gained when you 'opt-in' to receive e-mails when joining the Network, via email, or by opting in on directly on our Newsletter or Website. We do not pass on this information to third-party companies.

Any individual can unsubscribe at any point using the Unsubscribe link at the footer of the e-newsletters. From May 2018, the WTPN will contact any inactive subscribers (individuals who have not recently opened or engaged with the e-mails they receive from us) on an annual basis to re-confirm their interest in receiving our e-newsletters.

If you wish to be removed from this database, you can unsubscribe at any point by clicking on the link on the foot of the e-newsletter. You will be given an opportunity to unsubscribe in every email we send.

## **3. Website privacy information**

### **Our Website**

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to promote our services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

We collect information through the website for the purposes of membership registration, to collect queries via the contact form, to enable you as network members and website customers to interact on our on-line forums if you subscribe to them, to book and pay for courses and for general newsletter subscription.

We receive, collect and store any information you enter on our website or provide us in any other way. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

We also collect personally identifiable information, including name and e-mail addresses, via our online member forums, which include comments, feedback, reviews, recommendations, and personal profiles.

We collect such Non-personal and Personal Information for the following purposes:

- To provide and operate the Services of the Network and its website;
- To provide our Users with ongoing customer assistance and technical support;
- To book customers onto courses run by the WTPN and associated partner organisations
- To be able to contact our Visitors and Users with general or personalised service-related notices and promotional messages;
- To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we may use to provide and improve our respective services;
- To comply with any applicable laws and regulations.

If you visit the website but do not provide your details as above, we do not collect any personal information about you through the website, although we may track your use of the website using cookies. Cookies are small anonymous text files that are placed on your computer by websites that you visit.

We use Google Analytics cookies to track anonymous usage statistics and do not collect any personal information that can be used to identify you. This helps us analyse data about webpage usage and improve our website in order to tailor it to user needs.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites you can visit [www.tools.google.com/dlpage/gaoptout](http://www.tools.google.com/dlpage/gaoptout)

Western Training Providers Ltd makes every effort to maintain the accuracy of the information on our website and in our digital communications but cannot accept responsibility for any loss or damage which may occur from use of the information. This website and our digital communications may contain links to external websites managed and maintained by external companies. We are not responsible for the privacy practices, cookie policies or the content of such websites or of other third parties. The WTPN does not provide quality control of external links; the inclusion of any company's name within the pages or digital communications should not be construed as a recommendation of that company's products and / or services.

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

#### **4. Information about your rights**

You have a number of rights in relation to your personal data. These include the right to:

- find out how we process your personal data
- request that your personal data is corrected if you believe it is incorrect or inaccurate
- obtain restriction on our, or object to, processing of your personal data
- withdraw your consent to our processing of your personal data
- obtain a copy of the personal information which we hold about you.

If you would like to make a Subject Access Request and obtain a copy of the personal information that we hold about you, we are more than happy to do so free of charge – with the exception of requests that are manifestly unfounded, excessive or repetitive. If we determine this to be the case, we may charge a reasonable fee or refuse to act on the request. We will respond and provide the information within one month of receiving your request.

Please send your request to Alex Richards, Operations Director, at [westerntrainingproviders@gmail.com](mailto:westerntrainingproviders@gmail.com) with Subject Access Request in the subject line. We may take steps to verify your identity before responding to your request.