

## Privacy Notice for Training Course Attendees

This privacy notice describes how we collect and use personal information about you during and after your professional relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following the United Kingdom's exit from the European Union, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

The Kite Academy Trust is a data controller. This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you understand how we are processing your information and the procedures we take to protect your personal data.

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

### The Categories of Information that We Collect, Process, Hold & Share

We may collect, store and use the following categories of personal information about you as part of our training service provision:

- Personal information and contact details such as name, title, addresses, date of birth, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Information relating to any special requirements you may have in order to participate in our training service provision (i.e. accessibility requirements, medical conditions etc.)

### How We Collect This Information

We will collect this information from you when you submit an online booking form.

### How We Use Your Information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to take steps to enter into a contract with you;
- Where we need to comply with a legal obligation (such as health and safety legislation or under statutory codes of practice);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.
- When you have provided us with consent to process your personal data.

Generally, the purpose of us collecting your data is to enable us to facilitate attendance and participation in training courses. We also collect data in order to carry out equal opportunities monitoring and to ensure appropriate access arrangements are put in place if required.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

### How We Use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as **special category data**) require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our Data Protection Policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring.

### Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the professional relationship with you or where we have another legitimate interest in doing so.

### Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the Trust only retains personal data for as long as necessary to fulfil the purposes it was collected for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Once we have provided our training services to you, we will store your information in accordance with the Kite Academy Trust Records Retention Policy.

### Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information. Details of our security procedures can be found within the Kite Academy Trust's Data Protection Policy and Data Breach Procedure.

### Your Rights of Access, Correction, Erasure & Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your professional relationship with us.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a **subject access request**). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information 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.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you wish to exercise any of the above rights, please contact [dpo@kite.academy](mailto:dpo@kite.academy)

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).

### **Right to 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. To withdraw your consent, please contact [dpo@kite.academy](mailto:dpo@kite.academy). 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.

### **How to Raise A Concern**

We hope that we can resolve any query you raise about our use of your information in the first instance.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice:

Data Protection Officer:           Judicium Consulting Limited, 72 Cannon Street, London, EC4N 6AE  
[dataservices@judicium.com](mailto:dataservices@judicium.com)  
[www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues, at <https://ico.org.uk/concerns>

