

Smart Training and Recruitment is committed to protecting your personal data. This policy explains how and why we use your personal data to make sure you remain informed and in control of your information.

Smart Training and Recruitment will ask visitors to “opt-in” to receive information about our products and courses. This means you will have the choice as to whether you want to receive these messages when you contact us via our enquiry form.

You can choose not to receive information or change how we contact you at any time. If you would like to, please let us know by:

Writing to us at our company address:

Smart Training and Recruitment

39-40 Quay Street

Newport

Isle of Wight

PO30 5BA

Telephone: 0330 088 0888 (Mon to Fri: 9am-5pm Sat and Sun: Closed)

We will never sell your personal data. We may share personal data with other organisations with who we work to provide the service to you. However, these activities will be carried out under contracts that have strict requirements to keep your information confidential and secure.

## Questions

Any questions you have about this policy or how we use your personal data should be sent to: [GDPR@smarttar.co.uk](mailto:GDPR@smarttar.co.uk) or addressed to The Data Protection Officer at the postal address given above.

## About Us

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you) will be collected and used by Smart Training and Recruitment.

For the purposes of data protection law, Smart Training and Recruitment will be the Data Controller.

## What information do we collect?

- Personal data you give to us.

## We collect the data you give to us. For example:

- Personal details (name, date of birth, email, address, telephone, education details etc.) when you enrol on a programme with us.
- Data known as sensitive personal data (ethnicity, additional learning needs)
- Information created by your involvement with Smart Training and Recruitment

## How do we use personal information?

We only ever use your personal data with your consent, or where it is necessary:

- To comply with a legal duty
- To protect your vital interests; this means, for example, keeping you safe from harm
- For our own (or a third party's) lawful interests, provided your rights are not affected.
- We will only use your information for the purpose or purposes it was collected for.

### **Administration**

We use personal data for administrative purposes. This includes:

- Processing your enrolment through our system.

### **Marketing**

We use personal data to communicate with people and to promote Smart Training and Recruitment. This includes keeping you up to date with our news and offerings.

### **Research and Analysis**

We may carry out research and analysis on the data we hold to understand behaviour and responses and identify patterns and trends.

We evaluate, categorise and profile personal data to tailor services and communications we send out (including targeted advertising) and to prevent unwanted material from being sent to you.

### **Disclosing and sharing data**

We will never sell your personal data. If you have opted-in to marketing, we may contact you with information about further opportunities in education.

We may share personal data with other organisations who provide us with services. For example, we may use an IT supplier to process personal data. However, these activities will be carried out under contracts that have strict requirements to keep your information confidential and secure.

### **Marketing**

Smart Training and Recruitment will ask its contacts to “opt-in” for marketing communications. This means you will have the choice as to whether you want to receive these messages.

### **Young people**

As an education provider, we regularly process the personal data relating to young people who enquire about courses and training opportunities.

### **How do we protect personal data?**

We use a variety of physical and technical methods to keep your data safe and to prevent unauthorised access or sharing of your personal information.

Electronic data and databases are stored on secure computer systems, and we control who has access to information using both physical and electronic means.

Our employees receive data protection training, and we have a set of detailed data protection procedures that personnel are required to follow when handling personal data.

## **Storage of personal data**

### **Where Smart Training and Recruitment information is stored**

Smart Training and Recruitment's operations are based in the UK, and we store our data primarily within the European Economic Area (EEA).

### **How long does Smart Training and Recruitment Keep information for?**

We will only use and store information for as long as it is needed for the purposes it was collected for. How long we keep information depends on the information and what it's used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we will keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

### **How do we ensure that you remain in control of your data?**

We want to ensure you remain in control of your personal data and that you understand your legal rights which include:

- The right to ask and be told whether or not we have your personal data and, if we do to obtain a copy of the personal data we hold (this is known as a subject access request)
- The right to have your data deleted (though this will not apply where it is necessary for us to continue to use the data to administer your training course or apprenticeship.
- The right to have incorrect data amended
- The right to object to your data being used for marketing purposes or profiling
- Please note that there are some exceptions to the rights above and, although we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights, please write to or email our Data Protection Officer at the addresses given in section 1.

We can provide you with a subject access form template that includes guidance on how to make your request and will help us respond more quickly. Please contact us for a copy of this.

## **Complaints**

You can complain to Smart Training and Recruitment directly by contacting our Data Protection Officer using the contact details set out above. If you would like to make a complaint that does not directly relate to your data protection and privacy rights please see Smart Training and Recruitment's complaints policy at [Smarttar.co.uk](http://Smarttar.co.uk)

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk).

**Links to other websites**

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the web page)

If an external website requests personal information from you, the information you provide will not be covered by Smart Training and Recruitment's privacy policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with Smart Training and Recruitment.

**Changes to this privacy policy**

We will amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.