

## PRIVACY NOTICE

### BACKGROUND:

360 Skills for Life understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, contractors, and employees and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

360 Skills for Life

Community Interest Company registered in England under company number 13081475

Registered address: 4 Cedar Park, Cobham Road, Wimborne, Dorset BH21 7SF

**Representative:** Rob Hattersley

Email address: [rob.hattersley@360skillsforlife.org](mailto:rob.hattersley@360skillsforlife.org)

Telephone number: 01202 130395

Postal address: 4 Cedar Park, Cobham Road, Wimborne, Dorset BH21 7SF.

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- j) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Data Collected	How We Collect the Data
Identity Information including name and title.	Through personal contact (i.e. you share this information with us when we communicate). Sometimes through online form sign up, or e-newsletter. Some basic publicly available information is added from social media and other websites or services where available.
Contact information including work address, email address, telephone numbers.	Through personal contact (i.e. you share this information with us when we communicate). Sometimes through online form sign up, or e-newsletter. Some basic publicly available information is added from social media and other websites or services where available.
Business information including business name, business address, job title.	Through personal contact (i.e. you share this information with us when we communicate). Sometimes through online form sign up, or e-newsletter. Some basic publicly available information is added from social media and other websites or services where available.
Payment information including card details and bank account details.	You will provide these directly to us or through a secure online payment form.
Profile information including professional area of interest.	Through publicly available information such as professional social media, or by you telling us via a survey, online form or a face to face or online meeting.
Data from third parties including professional social media accounts and websites.	We use publicly available data on social media such as LinkedIn or Twitter. We also use publicly available generic email addresses for organisations such as schools.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information

Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

We do not place cookies on your computer or device. Our Site collects certain information automatically, including your IP address, the type of browser you are using, and certain other non-personal data about your computer or device such as your operating system type or version, and display resolution.

If you send us an email, we may collect your name, your email address, and any other information which you choose to give us. For the purposes of the Data Protection Legislation, We are the data controller responsible for such personal data.

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(f) of the UK GDPR which allows us to process personal data when it is necessary for the purposes of our legitimate interests, in this case, the proper operation and functionality of Our Site. If you contact us as described above, you will be required to consent to our use of your personal data to contact you. In this case, our lawful basis for using your personal data will be article 6(1)(a) of the UK GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Employee, Customer and Supplier name, contact details. Employee information such as DOB, health information, bank details and payroll information.	Contract In order to fulfil our contract with you.
Supplying our products/services to you.	We will use data such as usernames and email addresses to manage access to our school dashboard.	Contract You have supplied this information to us and subscribed to our service.
Managing payments for our products and services.	Bank or credit card details.	Contract We are contracted to supply you with a service which you are paying for.
Communicating with you.	Name, email address, phone number.	Legitimate interest – public bodies such as NHS and

		<p>police have funded access to schools which we need tell you about.</p> <p>Legitimate interest – your organisation may benefit from supporting our programme financially or in kind.</p>
<p>Supplying you with information by email and post that you have opted-in-to (you may opt-out at any time by emailing hello@360skillsforlife.org)</p>	<p>Name, email address, postal address.</p>	<p>Consent</p> <p>You have chosen to receive such information.</p>

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
<p>Identity Information including: name, DOB, gender, title.</p>	<p>Employees – 7 years after the contract/employment has ended.</p> <p>Service Users – 12 months after contract has ended.</p> <p>Recruitment – applicant details – 12 months after post is filled.</p>
<p>Contact information including: telephone numbers, address and email address.</p>	<p>As Above</p>

Business information including: business name, job title and contact details.	7 years after employment/ contract has ceased if related to accounts and payments. 12 months if not related to accounts and payments.
Payment information including: bank details, VAT and Company numbers. NI number.	7 years after contract/employment has ceased.
Profile information including: programme preferences and educational areas of interest.	12 months.

## 8. How and Where Do You Store or Transfer My Personal Data?

We store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#)

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

We sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply products and services

Recipient	Activity Carried Out	Sector	Location
Local Authority, NHS Provider, Police for the provision of services provided by 360 Skills for Life	Provision of in school education service delivery.	Education.	UK

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Data Protection Officer):

Email address: [hello@360skillsforlife.org](mailto:hello@360skillsforlife.org)

Telephone number: 01305 130395.

Postal Address: 4 Cedar Park, Cobham Road, Wimborne, Dorset BH21 7SF

#### 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our website. This Privacy Notice was last updated July 2021.