

Privacy Policy

Introduction

We are committed to protecting your privacy. This Policy governs our data collection, processing and usage practices and describes your choices regarding use, access and correction of your personal information. By using our website(s) or any of our services, you consent to the data practices described in this privacy policy.

This Privacy Policy explains how Corndel Limited of 315 Highgate Studios, 53 – 79 Highgate Road, London, NW5 1TL, company number 10369857 (“Corndel”, “We”, “Us”), uses information about current and prospective customers and learners.

Our Privacy Policy explains:

- the basis for the lawful processing of personal data
- the information do we collect about you
- how we use your information
- access to your information, correction, retention, and deletion
- sharing your personal data
- cookies
- changes to our privacy policy
- how to contact us

We have tried to keep this policy as simple as possible, but if you are not familiar with terms or if you have any questions, please contact us.

Basis for lawful processing of personal data

The legal basis for the collection and processing of your personal data is:

- for administration: which is necessary to fulfil service requests
- where consent is provided or processing may be necessary, to comply with legal obligations
- where explicit consent has been provided for processing sensitive data
- when legally required by the Education and Skills Funding Agency (ESFA) and or other relevant authority

The information we collect and hold about you

Learners

We collect information about you when you enrol on a programme. This includes your full name, contact details, date of birth and National Insurance number. Full details of the data we collect, how we process it and for what purposes are set out in Schedule 1: Data Processing Activities at the end of this policy.

We also collect information when you participate in learning activities and when you provide feedback.

Customers

We hold information that you have provided to us directly via our website, via direct contact with one of our employees or associates, or via one of our partners such as an event management company (if you have provided consent for them to pass on your details to Corndel).

This can include your full name, job title, business email and postal addresses and business phone numbers.

We also collect information when you buy our services, and when you provide feedback.

How we use your information

Learners

We only collect what is needed for the delivery and for funding and auditing purposes of the programme you are enrolling on.

This information helps us to tailor our programmes to suit your learning needs, to evidence the training you have received, and to demonstrate to auditors and qualification awarding bodies that compliance and quality requirements are met.

Your information may be shared with a limited number of organisations such as our technology suppliers MWS Technology, Microsoft, Nutshell and HubSpot.

To deliver this contract, Corndel will need to provide personal data to a limited number of organisations involved in the delivery of an apprenticeship, such as its technology suppliers, the Education & Skills Funding Agency, Ofsted and the relevant qualification awarding bodies.

We are required by the Education and Skills Funding Agency to retain your personal information for 7 years for auditing and funding purposes. This is stored securely and fully deleted from our systems once this time has passed.

Corndel will not use or share your information for marketing purposes.



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Customers

We only use the information to contact you about Corndel's training programmes, products, events and seminars that may be relevant to your business.

Your information may be shared with a limited number of organisations such as our technology suppliers MWS Technology, Microsoft, Nutshell and HubSpot.

If you buy our services or products, we will only use your information to carry out the requirements of the contract. In some cases, we will need to provide your data to a limited number of organisations involved in the delivery of an apprenticeship, such as our technology suppliers, the Education & Skills Funding Agency, Ofsted and the relevant qualification awarding bodies.

We are required by the Education and Skills Funding Agency to retain your information for 7 years for auditing and funding purposes. This is stored securely and fully deleted from our systems

Access to your information, correction, retention, and deletion

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the address below.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

You can unsubscribe from our mailing lists at any time by selecting the unsubscribe option at the bottom of any email communication or contacting us on the email or phone number below. Your information will be removed from all mailing lists but will be held on a secured suppression list so that we can check against this before mailing out to any newly obtained contact lists.

For **learners** who have started one of our programmes, we will not be able to remove your data for 7 years due to contractual, auditing and compliance purposes.



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Sharing your personal data

Learners

We may need to share your personal data with our employees, agencies, suppliers (including any intermediaries or other product providers involved in the delivery of your training) for the following purposes:

1. to deliver and administer your training
2. for staff training
3. quality assurance
4. to fulfil a statutory/legal obligation
5. for safeguarding, or health and safety purposes
6. to determine what training you may benefit from in the future
7. to offer other educational and career progression opportunities.

We may also share recordings of workshops with other members of Learners' cohorts to enable non-attendees to access material for educational purposes.

We may report to Customers (your employer), providing basic Learner progress data, including number of modules completed and exam results. For the avoidance of doubt, we will not allow Employers to view learning plans, listen to 1-2-1s or read answers provided by Learners in their assignments/exams.

Customers/Learners

We would use your personal data in any legal proceedings. We are required by law to disclose your personal data to law enforcement agencies in connection with any investigation to prevent unlawful activity.

We will never disclose your personal data to any third parties for the purposes of marketing.

We use some software packages that may require transfer of some personal data outside of the UK to the United States and undertake that we shall only do so if we have the adequate transfer mechanisms in place, namely Standard Contractual Clauses.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.



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Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email: info@corndel.com

By phone: 020 8102 9040

By post: Data Privacy Officer, Corndel Limited, 315 Highgate Studios, 53 – 79 Highgate Road, London, NW5 1TL



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SCHEDULE 1 Data Processing Activities

Type of data	Type of data subject	Type of processing	Purpose of processing	Type of recipient to whom personal data is transferred	Retention period
<ul style="list-style-type: none">- Name and contact details- Racial/ethnic origin- Date of birth and gender- Employment details- Educational details- Educational achievement- Health details- National Insurance Number- ID in suitable format	Customer/Learners	Multi-processing	To ensure eligibility for learning programmes and to meet regulatory compliance.	Provider of Software as a Service (SaaS) platforms used by Corndel to process data: Aptem, Office 365 and Nutshell	10 years.
<ul style="list-style-type: none">- Learner course work	Customer/Learners	Multi-processing	To facilitate the learning of the Apprentices.	Provider of Software as a Service (SaaS) platforms used by Corndel to process data: Aptem, Office 365 and Nutshell. Duly appointed Assessors for the programme which the learner is studying	10 years.

Document Approval

Role	Name	Version Approved	Date Approved
Document Owner	Annemarie Schofield	1.0	07/05/2018
Approved By	Mushall Khan	1.0	07/05/2018
Document Owner	Annemarie Schofield	2.0	20/05/2019
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Document Owner	Annemarie Schofield	3.0	26/10/2020
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Document Owner	Richard Bridge / Tamanna Begum Chowdhury	4.0	24/06/2021
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3.0	26/10/2020	20/10/2020	Amendment
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