

# Privacy Policy

## Our approach to Data Protection and Privacy

<http://www.online-care-courses.co.uk> is a website of Low Cost E-Learning Ltd (company number 10372858). We are specialists in providing workplace training across the UK. In addition to keeping your workforce trained and safe, as the Data Controller of this company we are committed to keeping your data secure and confidential as a visitor to this website and/or as a customer.

This Privacy Policy forms our commitment to keeping your data secure, confidential and lawfully processed. It sets out how we use your data when you visit this website and use our services.

### 1. Law

The information contained in this Privacy Policy shall be governed and construed in accordance with English law and be subject to the exclusive jurisdiction of the English courts.

### 2. General Data Protections Regulations

We abide by the principles set out in the GDPR regulations.

### 3. When we collect your data

We collect personal data in a number of circumstances:

When you visit this website

- Processing your booking with us whether online or through our customer services team.
- When you contact us to discuss your booking.
- When corresponding with you or contacting you about our services.
- When you take part in surveys or provide us with feedback.
- When someone books a place on a course with us on your behalf.

### 4. What data do we collect about you

We use Google Analytics remarketing codes to log when users view specific pages or take specific actions on a website. This allows us to provide targeted advertising in the future. If you do not wish to receive this type of advertising from us in the future you can opt-out by visiting Google's Ads settings, by using the Network Advertising Initiative opt-out page or control the use of device identifiers by using your device's settings. Third-party vendors, such as Google, use cookies to serve ads based on a user's prior visits to our website.

## Data categories

Identification – name, age/date of birth. Employer, role (if you contact us on behalf of a company you are employed by).

Contact details – email address, telephone number, location/postal address.

Account – your purchase, quotation and communication history with us, and marketing preferences

Electronic identification – IP address, website cookies, location, browser, device, operating system

Usage – usage of website, products & services

Payment details – debit/credit card/invoicing details, billing contact details.

Training history – course title, qualification type, date taken, validity, expiry, location taken, grade.

## 5. How we use your data

We only use your data when it is lawful for us to do so. Please find information on how we use your data below, and the lawful basis for processing in each case.

Type/Purpose of Processing	Lawful Basis for Processing	Data Categories
Processing your order	Contract	Identification, Contact, Account, Payment Details
Performance of administrative, accounting or customer service tasks relevant to an order, enquiry and/or training	Contract	Identification, Contact, Account, Payment Details
Fulfilment of your training, and verification of it after completion.	Contract	Identification, Contact, Training History
To fulfil your training in any case where you have medical, disability or other health needs that are necessary to be considered for the successful provision of training	Consent	Health/Medical/Disability information

Provide you with information on relevant products, services and offers if you have contacted us	1.Contract/Pre-Contractual Intention 2. Legitimate Interests – To help ensure you fulfil all your training requirements and to market our products & services	Identification, Electronic Identification, Contact, Account, Training History
Inform you when the training you have purchased is approaching it's expiry	Legitimate Interest – To offer you the best possible service we can, and improve brand loyalty	Identification, Contact, Account, Payment Details, Training History
Manage your marketing, website and service preferences	Legitimate Interest – To honour your preferences as a user of our website, customer or other interested party	Identification, Electronic Identification, Contact, Account
Gather feedback on products, services and experience	Legitimate Interest – To both improve and to ensure you are happy with, our products, services and customer experience.	Identification, Contact, Account, Training History
Provide you with relevant information and marketing through personalisation	Legitimate Interest – To offer you the best possible service through relevant information and content, and to grow as a company through improving marketing effectiveness	Identification, Electronic identification, Contact, Account, Training History
Analysis of website and product usage, communications, purchase history and marketing data to gain knowledge on service and product performance, user behaviour and marketing effectiveness	Legitimate Interest – Improve our website, customer experience, products, services and marketing in order to improve & grow as a company	Identification, Electronic identification, Contact, Account, Training History
Quality assurance testing, monitoring, auditing, market analysis, developing of and	Legitimizes interest – To improve products, services, business processes and	Identification, Electronic Identification Contact,

training on products, services, business systems and processes	systems, security and protection of business assets	Account, Training History, Account
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## Cookies & IP Addresses

We use your IP address and website cookies to analyse your use of this website, and for internet advertising purposes. These bits of information allow us to track how you use our website as an individual, but don't give us personal data like your name, email address or phone number. You are opted out of cookie tracking by default.

When you provide consent, we analyse user behaviour on this website to improve our services, the user experience of the website and our marketing activities. We may also use public & proprietary IP address lookup tables to identify your organisation, if you're browsing on behalf of a company, to check your customer history and offer you the best possible service as an existing or prospective customer. In some limited cases i.e. single person companies, it may be possible to identify personal data from publicly available ICANN data.

## 6. Retention Periods

We store data on you for different lengths of time depending on the type of user you are and your relationship with the company. We use a combination of criteria to determine how long we keep the different types of data we hold on you.

Some data is required to be held by law and to fulfil our contractual obligations with both you as a customer, and the awarding bodies we work with to certify your qualifications. In other situations, we store your data for as long as we believe there is a legitimate mutual interest between us, as an existing or prospective customer. You have certain rights under the GDPR to remove, transfer or change this data – please see the 'Your Data Rights' section for more information'.

## 7. Direct Marketing

If allowed by the Applicable Law and/or your consent, we may contact you from time to time to provide you with information which we think you may find of interest, unless you have opted out of such contact.

You can contact us at any time to withdraw your details and consent to processing from our marketing database, by contacting [info@lcel.co.uk](mailto:info@lcel.co.uk).

We will not make available or sell your information to third parties for marketing purposes. However, if we sell, assign or transfer the assets of our business, or if our

business is merged or enters into a joint venture with another business entity, we reserve the right to sell or transfer the database maintained by us (including any personal information provided by you).

## **8. Suppliers and Sub-processors**

In order for us to provide you with great quality Health and Safety training and an enjoyable browsing experience, we sometimes use services provided by other companies to assist us. These suppliers range from operational (e.g. our accountants), product (e.g. our service providers), to technical (e.g. our Web Hosting provider, online payment providers).

Where necessary, we may share your personal data with these companies for processing in order to fulfil certain services. This is always done in a secure, confidential manner and your data is only held with the company for as long as is necessary in each case. The organisations will also always have appropriate technical and organisational methods in place to protect your data.

A full list of these providers, the personal data they hold, why we send them this data and the length of time they hold the data for can be obtained if required by contacting [info@lcel.co.uk](mailto:info@lcel.co.uk).

We may also disclose personal information where information is part of a due legal process and otherwise required or permitted by law.

## **9. Location and International Transfers**

Your data is largely held and processed within the EEA, however some of our third-party suppliers, such as hosting providers and other technology focused service providers, are based in the USA and so store and process data within the USA.

In these cases, the companies subscribe to the EU-US Data Privacy shield program (<https://www.privacyshield.gov/welcome>), which aims to ensure USA based business comply with relevant European Data Protection regulations when dealing with European businesses' personal data.

By submitting your data and agreeing to this policy you agree to this transfer, storing or processing.

## **10. Security**

We employ technical and organisational measures to protect the information provided by you from access by unauthorised persons and against unlawful processing.

This is achieved through a wide range of methods, including but not limited to: data encryption where appropriate, risk analysis, staff training, internal information security policies and other methods recommended under the GDPR.

All third party data processors that we use (as described in section 7, 'Suppliers and Sub-processors'), have also confirmed that they employ the technical and organisational methods needed to keep your data safe and secure.

### **Other Collectors of Information**

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, different rules may apply to their use or disclosure of the information you disclose to them. To the extent that we use third party advertisers, they adhere to their own privacy policies. Since we do not control the privacy policy of any third party, you are subject to the privacy policy of that third party.

## **11. Your Data Rights**

We adhere to all rights given to individuals under the GDPR. To exercise any of these rights with the personal data we hold on you, please contact [info@lcel.co.uk](mailto:info@lcel.co.uk) or write to:

Low Cost E-Learning Ltd, Spectrum House, Beehive Ring Road, Gatwick, West Sussex, United Kingdom, RH6 0LG

### **Subject Access Requests**

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email us at [info@lcel.co.uk](mailto:info@lcel.co.uk) with sufficient information to enable us to identify you. We will respond to your request within one month of receipt of the request.

### **Updating and Correcting Information**

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

### **Objections to processing of personal data**

It is your right to lodge an objection to the processing of your personal data if you feel the "ground relating to your particular situation" apply. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

### **Data Portability**

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

## **Right to be Forgotten**

Should you wish for us to completely delete all information that we hold about you for, please either email [info@lcel.co.uk](mailto:info@lcel.co.uk) or write to:

Low Cost E-Learning Ltd, Spectrum House, Beehive Ring Road, Gatwick, West Sussex, United Kingdom, RH6 0LG

Please note that if the personal data you wish to delete is needed for lawful purposes and/or contractual fulfilment, it may not be possible for us to remove this.

## **12. Complaints**

If you believe we have processed your data unfairly or unlawfully, you have the right to lodge a complaint with a supervisory authority, such as the Information Commissioner's Office within the UK – <https://ico.org.uk/>.

## **13. Changes to this Policy**

We may need to change this Privacy Policy over time. We will post changes to this Privacy Policy to the website when such changes are necessary. All amended terms shall automatically be effective immediately after they are initially posted on the website.

## **14. Contact us**

If you have any questions about this Privacy Policy, how we run the website or your dealing with our website, please send an e-mail to us at:

[info@lcel.co.uk](mailto:info@lcel.co.uk)

Or write to us at:

TutorCare Ltd, Spectrum House, Beehive Ring Road, Gatwick, West Sussex, United Kingdom, RH6 0LG

This privacy policy ("Privacy Policy") is provided by Low Cost E-Learning Ltd (registered company number 10372858) whose registered office is at Low Cost E-Learning Ltd, Spectrum House, Beehive Ring Road, Gatwick, West Sussex, United Kingdom, RH6 0LG (referred to as "us", "our" or "we" in this Privacy Policy) for the information of visitors (referred to as "you" or "your" in this Privacy Policy) to our website, the URL of which is <http://www.online-care-courses.co.uk/> referred to as the "Website" in this Privacy Policy.