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Type of document	Corporate
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SLT member responsible for policy	Executive Director of Strategic Planning & Corporate Services
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Head of Department (HOD) responsible for policy	Kelly Condon
Author of policy	Department Head
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This document is only valid on the day of printing

Controlled Document

This document has been created following the RNN Group policy production guidelines. It should not be altered in any way without the express permission of the author or HOD detailed above.



Privacy Policy

Version 1.4

17th January 2023

Version Control Table

Date	Version No	Summary of Changes	Changes Made By
4 th April 2018	1.0	Birth of policy	Ian Headley
8 th May 2018	1.1	GDPR review, minor wording changes	Ian Headley
26 th June 2018	1.2	Section 12 Hotjar update, requested by Marketing	Ian Headley
5 th December 2019	1.3	Changes reflecting RNN Group organisation and internal references, linked policies updated	Kelly Condon
17 th January 2023	1.4	Section 12 Cookies update, Removal of subsidiary company, Annual review. Amendment to department name.	Kelly Condon

All or part of this document can be released under the Freedom of Information Act 2000

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1. Introduction

- 1.1 The RNN Group (hereinafter referred to as the 'Group') is committed to protecting privacy and security. This policy explains how and why the Group use personal data and to ensure that those whose personal data is held remain informed and in control of their personal information.
- 1.2 The Group is classed as the 'Data Controller' for the information it collects, this simply means that the Group are responsible for the personal data that is provided. The Group have strict policies and processes in place to ensure that it remains safe whilst in the possession of the Group.
- 1.3 Personal data means any information concerning or relating to an identified or identifiable individual. This data will include, but is not restricted to, such things as name, telephone number as well as postal or email address.
- 1.4 The Group will collect and retain information whenever someone accesses Group websites, complete Group forms or when provided by telephone. If the contact is made electronically (e.g. by email or Internet) then the Group may collect an electronic identifier such as Internet Protocol (IP) address.
- 1.5 The Group may use an individual's name and email address to inform them of our future offers and similar products or services. This information is not shared with third parties and can unsubscribed from at any time by contacting marketing@rnngroup.ac.uk or by opting out via the email link provided.
- 1.6 The Group will **NEVER** sell personal data and it will only ever share it with other organisations that they work with where necessary and if its privacy and security can be guaranteed at all times. The Group may, in certain circumstances, have a statutory duty or obligation to pass some details to government departments and potentially to the Police.
- 1.7 Questions?
Any questions in relation to this policy or how the Group use personal data should be sent by email to the Data Protection Officer dpo@rnngroup.ac.uk or if preferred, by post to The Data Protection Officer, RNN Group, Eastwood Lane, Rotherham S65 1EG.

2. About Us

- 2.1 Personal data (i.e. any information which identifies an individual, or which can be identified as relating to an individual personally) will be collected and used by the Group and/or its subsidiaries, all of whom are registered with the Information Commissioners Office (ICO), being the regulatory body for UK data protection:

RNN Group – ZA169145
National Fluid Power Centre Ltd. – ZA167208
Rotherham Education Services (RES) – ZA100970

3. What Information is Collected

3.1 Personal data provided

The Group collect, process and store (within designated retention periods) the data provided. This includes information given when applying or registering, when placing an order or communicating with the Group. For example, but not restricted to:

- a) personal details (name, date of birth, email, address, telephone etc.) when completing enrolment or application for a course or training;
- b) financial information (payment information such as credit/debit card or direct debit details, and bank details. **Section 8 (How we Protect Data)** contains more information on payment security); and
- c) marketing preferences

3.2 Information created through involvement with the Group

Any activities and involvement with the Group will result in personal data being created. This could include details of how an individual performed within a course setting, any assessments or moderation, along with the details provided by an individual at any of our promotional events.

3.3 Information generated

The Group conducts research and analysis on the information held, which can in turn generate personal data. For example, by analysing an individual's involvement with the Group, it may be possible to build a profile that helps decide which communications are likely to interest that individual. **Section 7 (Research and profiling)** contains more information about how the Group use information for profiling and targeted advertising.

3.4 Information about other people

If the Group is provided with information that relates to other people (e.g. next of kin), the individual providing that information must have sought their permission to provide that information to ourselves and that person must understand how we will use their information. By providing the information to the RNN Group, we will presume that this permission has been sought.

3.5 Information from third parties

The Group sometimes receives personal data about individuals from third parties. For example, when collaborating with another organisation (e.g. an individual provides their information to another learning provider that the Group is collaborating with on a project). Also, as explained in **Section 12 (Cookies and links to other sites)**, the Group may use third parties to help conduct research and analysis on personal data (and this can result in new personal data being created).

The Group may also collect information from social media or if an individual posts on one of the Groups social media pages.

3.6 Special categories of personal data

The Group do not normally collect or store special categories of personal data (such as information relating to health, beliefs or political affiliation). However, there are some situations where this will occur (e.g. if an individual engages with the Additional Learning Support team or Occupational Health department). The Group will ask to explicitly allow this type of information to be collected from an individual and will take extra care to ensure that privacy rights are protected.

3.7 Accidents or incidents

If an accident or incident occurs on Group Premises or properties, at an event run by or involving Group staff (including volunteers) then a record of this will be retained (which may include both personal and sensitive personal data). In these events the emergency contact details provided at enrolment will be used where appropriate.

3.8 Volunteer

If the case of volunteers, or those who are helping the Group for other reasons - for example those who work for another organisation that is running an event in partnership with the Group, then extra information about the individual may be collected (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect the organisation (including in the event of an insurance or legal claim) and for safeguarding purposes.

4. How We Use Your Information

4.1 The Group will only ever use an individual's personal data with consent or where it is necessary:

- a) to enter into, or perform, a contract with an individual;
- b) to comply with a legal obligation;
- c) to protect an individual's vital interests;
- d) in the public interest (as defined by the DPA2018 and/or GDPR or pertinent legislation);
- e) for our own (or a contracted third party's) legitimate interests which may include research and debt recovery, provided that the rights of the individual do not override these.

4.2 In any event, the Group will only use an individual's information for the purpose or purposes it was originally collected (or for closely related purposes) or if the individual has provided explicit consent allowing the use of the information provided.

Marketing

4.3 The Group may use personal data to communicate with people and to promote the Group. This includes keeping individuals up to date with news, updates of forthcoming events and other educational related information. For further information on this, please see **Section 6 (Marketing)**.

Administration

4.4 Personal data may be used for administrative purposes, this includes, but is not exclusive to:

- maintaining databases of learners and staff;
- performing obligations under relevant contracts;
- performing a legal obligation
- fulfilling orders for goods or services (whether placed online, over the phone or in person);
- helping respect the choices and preferences of individuals (e.g. if requesting not to receive marketing material, record of this will be kept).

Internal research and analysis

4.5 The Group carry out research and analysis on individual learners and staff to determine the success of campaigns and to better understand behaviour and responses allowing the identification of patterns and trends. This helps inform the approach towards campaigning and make the Group a stronger and more effective organisation. Understanding learners and staff, their interests and what they care about also helps the Group to provide a better, tailored, experience (e.g. through more relevant communications).

Research and profiling

4.6 The Group evaluate, categorise and profile personal data in order to tailor services and communications (including targeted marketing) and to prevent unwanted material from filling up an individual's inbox. This also helps the Group to understand learners and staff, improve the organisation and carry out research. Further information on profiling can be found in **Section 7 (Research and profiling)**.

5. Disclosing and Sharing Data

5.1 The Group will **NEVER** sell an individual's personal data.

5.2 The Group may contact an individual with information about its partners, or approved third party products and services, but these communications will always be from the Group and are usually incorporated into Group marketing materials (e.g. advertisements in fliers or newsletters).

5.3 The Group may share personal data with trusted partners, subcontractors or suppliers who provide the Group with services. However, these activities will be carried out under a contract that imposes strict requirements on those partners to keep all information confidential, secure and not processed more than necessary.

5.4 Occasionally, where the Group collaborate with other organisations, the Group may also share information with them (for example, if an individual registers for a course being jointly organised by the Group and another learning provider). Information will only be shared when necessary and the details of this agreement will be made available on request.

5.5 If there are any questions in relation to the collaboration of organisations, then these should be sent by email to the Data Protection Officer dpo@rnngroup.ac.uk

6. Marketing

6.1 The Group may use an individual's name and email address to inform them of future offers and similar products or services. It is possible to opt out from this type of communication by simply clicking on the opt out link that will be supplied within the email contact itself.

6.2 The term 'marketing' is broadly defined and covers information regarding courses and may include details from Group partner organisations.

6.3 This means the individual will have the choice as to whether they want to receive these messages and be able to select how they want to receive them (post, phone, email, text etc.).

6.4 It is possible to decide not to receive communications or change how contact is made at any time. Simply contact: marketing@rnngroup.ac.uk

What does 'marketing' mean?

6.5 Marketing does not just mean offering things for sale, but also includes news and information about:

- The organisation, campaigns and new courses run by the Group;
- The Group's role in education;
- Group offers;
- Participation in Group surveys;
- Employment opportunities;
- Group events and activities; and
- Products, services and offers (from within the Group, and those of approved third parties which may interest you).

6.6 When an individual receives a communication, the Group may collect information about them, how they respond to, or interact with, that communication and this may affect how communication is made in future.

Newsletters and Magazines

6.7 Magazines and newsletters are provided to learners and staff. These are sent out to everyone, where applicable (unless specifically requested not to) and any individual can choose to unsubscribe at any time should they wish to. However, please be aware that magazines may include advertisements, competitions and fundraising information from other organisations not related to the Group.

7. Research and Profiling

7.1 This section explains how and why the Group uses personal data to build profiles that enable better understanding of learners and staff, improve relationships with them, and provide a better experience.

Analysis and grouping

7.2 Interactions are analysed to determine common characteristics and preferences. This is done by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location).

7.3 By grouping people together based on common characteristics, it can help to ensure that group of people is provided with relevant communications, products, and information that is most important to them. This helps prevent an individual's inbox from filling up, which also means that resources are not wasted by contacting people with information that is not relevant to them.

Profiling to help understand learners and staff

7.4 The Group will also obtain information about individuals from other sources, much of which is available on public and private databases. This is done to enhance and fill-in any gaps in order to understand individual needs better, send the most relevant communications and target resources effectively.

Anonymised data

7.5 The group may aggregate and anonymise personal data collected so that it can no longer be linked to any particular person. This information can then be used for a variety of purposes, such as to identify trends or patterns within the existing learner or staff base. This information helps inform Group actions and improve campaigns, products/services and materials.

8. Young People

Photographs, pictures, stories and competitions in Group publications

8.1 If an individual's picture, photo or story is published, such publication will usually include first name and age with it. If an individual writes an article or contributes a statement to the Group, the surname may also be included.

8.2 If a child (as defined within UK legislation) enters a competition and is one of the winners or runners-up, their name may be published alongside those of the other winners.

Parental permission

8.3 Within UK legislation, if a child is under 13 years of age, then specific permission from their parent or guardian for the Group to share a picture, photo or story within marketing material will be sought.

Information for parents

8.4 The Group takes great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If a child is under 13 years of age, the Group will only use his or her personal data with parental consent. This means that, for example, if the child wants to have his or her name or picture featured in a Group publication then the parent or guardian will need to confirm that they are happy for this to occur.

Marketing

8.5 No marketing emails, letters, calls or messages will be sent to under 13 year-olds.

8.6 If a learner of the Group is under 13 years of age, their personal data will not be used for marketing purposes or profiled.

9. How Data Is Protected

9.1 The Group employs a variety of physical and technical measures to keep data safe and to prevent unauthorised access to, use of, or disclosure of personal information.

9.2 Electronic data and databases are stored on secure computer systems and who has access to the information (using both physical and electronic means) is controlled. Group staff receive data protection training and detailed data protection procedures which personnel are required to follow when handling personal data have been implemented.

Payment security

9.3 All electronic Group forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between the individual's browser and Group servers.

9.4 If a credit card is used on any of the Group sites, card details will be passed securely to the relevant payment provider. Other online payment methods are handled in a similar manner. The Group complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

9.5 The Group cannot guarantee the security of an individual's home computer or the Internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

CCTV

9.6 Some Group premises have CCTV and an individual may be recorded when visiting them. CCTV is there to help provide security and to protect both individuals and the Group. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only ever stored temporarily, unless it is flagged for review, or necessary for a legal purpose.

9.7 The Group complies with the Information Commissioner's Office (ICO) CCTV Code of Practice, and notices are put up to confirm when CCTV is in use.

9.8 Any questions in relation to the Group's CCTV systems can be sent by email to cctvenquiries@rnngroup.ac.uk

10. Storage

Where information is stored

10.1 The Group's operations are based in the UK and data is stored within the European Union. Some organisations that provide services to us may transfer personal data outside of the EEA, but we will only allow them to do so if your data is adequately protected. For example, some Group systems use Microsoft products. As a US based company, it may be that using their products result in personal data being transferred to, or

accessible from, the US. However, this will be allowed, as the Group are certain personal data will still be adequately protected.

How long information is stored

10.2 The Group will only use and store information for so long as it is required for the purposes it was originally collected or for legal and regulatory reasons. How long information will be stored, depends upon the information in question and what it is being used for. For example, the Group have a legal obligation to retain details for seven years under UK tax law, however, as another example, if an individual asks that marketing emails are not sent, emails for marketing purposes will stop being sent immediately (though a record will be kept of the preference not to be emailed).

10.3 The Group continually review what information is held and delete what is no longer required. Payment card information is never stored on any Group systems.

11. Keeping You in Control

11.1 It is important to ensure that the individual remains in control of their personal data. Part of this is confirming a clear understanding of legal rights, which are as follows:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

11.2 Full definitions of your rights can be found on the Information Commissioner's Office web site at www.ico.org.uk

11.3 Please keep in mind that there are exceptions to the rights above and, though the Group will always try to respond to the satisfaction of the individual, there may be situations where this is not possible.

11.4 For further information on rights or the desire to exercise them in relation to personal information that has been collected or processed, please contact the Information Governance and Assurance (IGA) team at RNN Group, Eastwood Lane, Rotherham S65 1EG or email IG@rnnngroup.ac.uk.

11.5 A template Data Subject Access form can be provided which includes guidance on how to make a request (and this will help to obtain a response more quickly). Please contact the IGA team, at the details above, for a copy of this.

Complaints

11.6 In order to make a complaint about how the Group has handled personal data, then please contact the complaints department in accordance with the Group's complaint policy by using the details set out below;

complaints@rnnngroup.co.uk

11.7 If the response received is not satisfactory, or there is a belief that data protection or privacy rights have been infringed, complaints should be directed to the UK Information Commissioner's Office that regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

12. Cookies and Links to Other Sites

Cookies

12.1 A cookie is a small file of letters and numbers that is downloaded on to a computer when visiting a website. Cookies are used by many websites and can do a number of things, e.g. remembering preferences, recording what has been put in a shopping basket, and counting the number of people looking at a website.

12.2 The rules on cookies are covered by the Privacy and Electronic Communications Regulations 2003 (PECR). PECR also covers the use of similar technologies for storing or accessing information, such as “Flash cookies” and device fingerprinting.

12.3 The ICO is responsible for enforcing these rules.

12.4 The Group uses cookies on all of its websites to provide the best experience and to help improve those websites. If desired, browser settings can be changed to block or delete cookies (for details see section 3). However, if this is done, please note that some areas of Group websites may no longer function properly.

Links to other sites

12.5 Group websites contains hyperlinks to other websites and some social plugins. The Group is not responsible for the content or functionality of any of those external websites or plugins (but please inform if a link is not working by using the 'Contact us' link on the website).

12.6 If an external website requests personal information from an individual (e.g. in connection with an order for goods or services), then the information provided will not be covered by the Group’s Privacy Policy. It is suggested that individuals read the privacy policy of any website before providing any personal information.

12.7 When purchasing goods or services from any of the businesses that any Group site links to, a contract will be entered into with them (agreeing to their terms and conditions) and not with the Group (unless they are a subsidiary company of the Group).

13. Changes to the Policy

13.1 The Group will amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why personal data is used. The current version of the Privacy Policy will always be posted on Group websites.

14. Linked Policies and Guidance

Policies and guidance linked to this policy:

- Data Protection Policy
- Data Subject Access Request (DSAR) Policy
- Data Retention Policy
- CCTV Policy
- Cookies Policy