

Document Title	Privacy Policy
Date written	4 th April 2018
Date last revised	4 th April 2018
Type of document	Corporate
Brief summary of contents	<p>To provide:</p> <ul style="list-style-type: none"> • Privacy information relating to how the Group handles data • What information we collect from data subjects • How we use the data we collect • Disclosing and sharing personal data • How we use data for marketing and research purposes • Age specific consent • Protecting and storage of data • Data subject rights • Information about cookies
SLT member responsible for policy	Tony De'Ath
This document replaces	None
Approval route/consultation	Data Protection Officer, SLT Member
Head of Department (HOD) responsible for policy	Data Protection Officer
Author of policy	Ian Headley

Contact details	ianheadley@rnngroup.ac.uk
Publication location	Public and portal
Date of final approval	
Date policy becomes live	
Review period	Annual
Links to external standards	ICO
Related documents	Cookies policy Data Protection Policy Data Subject Access Request (DSAR) policy
Keywords	Privacy, data, information, data subjects, disclosing, sharing, marketing, research, protection, storage, rights, cookies
Training needs	Data Protection

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 1.0

4th April 2018

Version Control Table

Date	Version No	Summary of Changes	Changes Made By
04/04/18	1.0	Birth of policy	Ian Headley

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

Table of Contents

Section	Description	Page
1.	Introduction	6
2.	About us	7
3.	What information we collect	8
4.	How we use information	10
5.	Disclosing and sharing data	11
6.	Marketing	12
7.	Research and profiling	13
8.	Young people	14
9.	How we protect data	15
10.	Storage	16
11.	Keeping you in control	17
12.	Cookies and links to other sites	18
13.	Changes to this privacy policy	19
14.	Linked policies	20

Appendices

Section	Description	Page
	None	

1. INTRODUCTION

The RNN Group is committed to protecting your privacy and security. This policy explains how and why we use your personal data and to ensure you remain informed and in control of your personal information.

The RNN Group is classed as the 'Data Controller' for the information it collects, this simply means we are responsible for the personal data that you provide to us. We have strict policies and processes in place to ensure that it remains safe whilst in our possession.

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 your name, your telephone number as well as your postal or email address.

We collect and retain your information when you access our web sites, complete RNN Group forms or when provided by telephone. If you contact us electronically (e.g. by email or Internet) we may collect your electronic identifier such as Internet Protocol (IP) address.

The RNN Group (and its subsidiary organisations) will ask you to "opt-in" for its marketing communications. This means you will have the choice and control as to whether you want to receive messages from ourselves and be able to select how you want to receive them (for example, email, phone, SMS or post).

You can decide not to receive communications or change how we contact you at any time. Simply contact:

marketing@rnngroup.ac.uk

The RNN Group will **NEVER** sell your personal data and it will only ever share it with other organisations we 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 of your details to government departments and potentially to the Police.

Questions?

If you have any questions in relation to this policy or how we use your personal data then please send these by email to our Data Protection Officer dp@rnngroup.ac.uk or if you prefer, by post to The Data Protection Officer, RNN Group, Eastwood Lane, Rotherham S65 1EG.

2. ABOUT US

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

Charnwood Training – A8199968

Create-Skills – ZA072632

Aston Training – Z6702549

Rotherham Education Services (RES) – ZA100970

3. WHAT INFORMATION WE COLLECT

Personal data you provide

We collect, process and store (within our retention periods) the data you provide to us. This includes information you give when applying or registering, when placing an order or communicating with us. For example, but not restricted to:

- personal details (name, date of birth, email, address, telephone etc.) when you enrol or apply for a course or training;
- 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
- marketing preferences

Information created by your involvement with RNN Group

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

Information we generate

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your involvement with ourselves we may be able to build a profile that helps us decide which of our communications are likely to interest you. **Section 7 (Research and profiling)** contains more information about how we use information for profiling and targeted advertising.

Information about other people

If you are providing information that relates to other people (e.g. next of kin), you 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.

Information from third parties

We sometimes receive personal data about individuals from third parties. For example, if we are collaborating with another organisation (e.g. you provide your information to another learning provider that we are collaborating with on a project). Also, as explained in **Section 12 (Cookies and links to other sites)**, we may use third parties to help us conduct research and analysis on personal data (and this can result in new personal data being created).

We may also collect information from social media or if you post on one of our social media pages.

Sensitive personal data

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation). However there are some situations where this will occur (e.g. if you engage with our Additional Learning Support team or occupational health department). You will be asked to explicitly allow this type of information to be collected from you and will take extra care to ensure your privacy rights are protected.

Accidents or incidents

If an accident or incident occurs on one of our campuses or properties, at one of our events or involving one of our staff (including volunteers) then we will keep a record of this (which may include both personal and sensitive personal data).

Volunteer

If you are a volunteer, or if you are helping us for other reasons - for example you work for another organisation that is running an event with us, then we may collect extra information about you (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 INFORMATION

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

- to enter into, or perform, a contract with you;
- to comply with a legal obligation;
- to protect your vital interests;
- in the public interest (as defined by the GDPR);
- for our own (or a contracted third party's) legitimate interests which may include research and debt recovery, provided your rights do not override these.

In any event, we will only use your information for the purpose or purposes it was originally collected (or for closely related purposes) or if you have provided explicit consent allowing the use of the information provided.

Marketing

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

Administration

We use personal data for our administrative purposes, this includes, but is not exclusive to:

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

Internal research and analysis

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

Research and profiling

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

5. 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 our partners, or approved third party products and services, but these communications will always be from the RNN Group and are usually incorporated into our own marketing materials (e.g. advertisements in fliers or newsletters).

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

Occasionally, where we collaborate with other organisations, we may also share information with them (for example, if you register for a course being jointly organised by ourselves and another learning provider). We will only share information when necessary and we will make sure the details of this agreement are made available to you on request.

If you have any questions in relation to the collaboration of organisations, then please send these by email to our Data Protection Officer dp@rnnngroup.ac.uk

6. MARKETING

The RNN Group will ask its learners, staff and other customers to “opt-in” for most communications. This includes all of our marketing communications. The term ‘marketing’ is broadly defined and covers information regarding courses and may include details from our partner organisations.

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

You can decide not to receive communications or change how we contact you at any time. Simply contact:

marketing@rnngroup.ac.uk

What does ‘marketing’ mean?

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

- our organisation, campaigns and new courses;
- our role in education;
- RNN Group offers;
- participating in our surveys;
- employment opportunities;
- our events and activities; and
- products, services and offers (our own, and those of approved third parties which we feel may interest you).

When you receive a communication, we may collect information about you, how you respond to, or interact with, that communication and this may affect how we communicate with you in future.

Newsletters and magazines

Magazines and newsletters are provided to our learners and staff. We send these out to everyone, where applicable (unless you specifically ask us not to) and you can choose to unsubscribe at any time should you wish to. However, please be aware that magazines may include advertisements, competitions and fundraising information from other organisations not related to the RNN Group.

7. RESEARCH AND PROFILING

This section explains how and why we use personal data to build profiles that enable us to understand our learners and staff, improve our relationship with them, and provide a better experience.

Analysis and grouping

We analyse our interactions to determine common characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location).

By grouping people together based on common characteristics, we can then ensure that group is provided with relevant communications, products, and information and is most important to them. This helps prevent your inbox from filling up, which also means we are not wasting resources by contacting people with information that is not relevant to them.

Profiling to help us understand our learners and staff

We will also obtain information about you from other sources, much of which is available on public and private databases. We do this to enhance and fill-in any gaps so that we can understand your needs better, send you the most relevant communications and target our resources effectively.

Anonymised data

We may aggregate and anonymise personal data we have 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 our existing learner or staff base. This information helps inform our actions and improve our campaigns, products/services and materials.

8. YOUNG PEOPLE

Photographs, pictures, stories and competitions in our publications

If we publish your picture, photo or story, we will usually include your first name and age with it. If you write an article or contribute a statement to us, we may also include your surname.

If your child (as defined within the GDPR) enters a competition and is one of the lucky winners or runners-up, we will publish their name alongside the other winners.

Parental permission: In the UK and within the GDPR, if your child is under 13 then we will need specific permission from you as their parent or guardian for us to share a picture, photo or story within our marketing material.

Information for parents

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 13, we will only use his or her personal data with your consent. This means that, for example, if your child wants to have his or her name or picture featured in one of our publications then we will need you to confirm you are happy for us to do so.

Marketing

We will not send marketing emails, letters, calls or messages to under 13 year-olds.

If a learner of the Group is under 13, we will not use their personal data for marketing purposes and we will not profile it.

9. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, use of, or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to the information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Payment security

All electronic RNN Group forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit card on our sites, we will pass your card details securely to our payment provider WorldPay. Other online payment methods are handled in a similar manner. RNN 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.

Of course, we cannot guarantee the security of your 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

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and the RNN 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.

The RNN Group complies with the Information Commissioner's Office (ICO) CCTV Code of Practice, and we put up notices so you know when CCTV is in use.

If you have any questions in relation to the RNN Group's CCTV systems, then please send these by email to cctvenquiries@rnn.ac.uk

10. STORAGE

Where we store information

The RNN Group's operations are based in the UK and we store our data 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 of our 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, we will allow this, as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

How long we store information

We 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, we have a legal obligation to retain details for seven years under UK tax law, however, as another example, if you ask us not to send you marketing emails, we will stop sending you emails for marketing purposes immediately (though we'll 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 on any of our systems.

11. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your 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

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

Please keep in mind that there are exceptions to the rights above and, though 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 or wish to exercise them in relation to personal information that we have collected or are processing, please write to our Data Protection Officer at RNN Group, Eastwood Lane, Rotherham S65 1EG or email dp@rnngroup.ac.uk.

We can provide you with a template subject access form that includes guidance on how to make your request (and this will help us respond more quickly). Please contact the Data Protection Officer, at the details above, for a copy of this.

Complaints

If you wish to make a complaint about how the RNN Group has handled your personal data, then you can contact our complaints department in accordance with the Group's complaint policy by using the details set out below.

complaints@rnngroup.ac.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 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

Web cookies are small pieces of data sent by web sites that are stored by your browser on your computer hard drive. Our websites use this technology to provide you with the best possible experience when interacting with them. Further information can be found in our Cookies Policy at:

www.rnngroup.co.uk/about/group-policies

The RNN Group web sites may use web beacons (pixel tags). When you open certain pages this pixel will be downloaded from a server and registered, this enables us to determine which pages were viewed, when and how often, as well as what actions were undertaken on these pages for instance.

Google analytics

The RNN Group uses Google Analytics, a web site analysis service from Google Inc. in the US. The cookies collected are used to analyse, and in turn, provide reports to the Group about your use and interaction with its web sites.

You can revoke your consent to the collection and use of information by Google at any time by installing the Google Opt-out Browser Add-on.

Links to other sites

Our website contains hyperlinks to other websites and some social plugins. We are not responsible for the content or functionality of any of those external websites or plugins (but please let us know if a link is not working by using the 'Contact us' link on the web site).

If an external website requests personal information from you (e.g. in connection with an order for goods or services), then the information you provide will not be covered by the RNN Group'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 the RNN Group (unless they are a subsidiary company of the Group).

13. 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.

14. LINKED POLICIES

- [Privacy policy](#)
- [Data Protection policy](#)
- [Data Subject Access Request \(DSAR\) policy](#)