

## Coaching Connexions General Privacy Notice

*Last updated: 24/05/2018*

Coaching Connexions Limited operates <http://coachingconnexions.co.uk>. This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.

For the purposes of Data Protection Laws, Coaching Connexions Limited is the Data Controller and also a Data Processor in respect of Personal data received.

Coaching Connexions Limited details are:

Coaching Connexions Limited  
Registered Office  
24 Hulme Street  
Manchester  
M1 5BW

Business Office  
Unit 4 Oakmere College  
Cherry Lane  
Liverpool L4 6UG

Coaching Connexions Limited also access shared services provisions linked to the provision of People Services, Finance, Management Information, Estates/Premises and Marketing with its associate company Access Creative College (Access to Music Limited).

Coaching Connexions Learners are funded by funding partner organisations under their funding agreements with the Education and Skills Funding Agency (ESFA), or other such Government funded agency, acting as executive Agency of the Department for Education (DfE).

Our funded vocational programmes are also delivered in conjunction with real industry partners under contractual agreements made with them.

Personal data regarding learners will be shared at appropriate points in the learning process with both funding partners in relation to the contractual requirements with the ESFA and delivery partners as part of work based activity and work experience delivered on club premises/facilities. You will be informed as part of your programme of studies of the specific details of partners with whom you are associated and with whom your data is shared.

**For employment purposes** we use the services of Verticality Limited t/a Easyweb Group for the purposes of collecting and processing data using their Applicant Tracking System (ATS) and other tools. For this purpose they are both a data controller as they determine the functionality and configuration of the system in conjunction with us the end user .and a data processor.

Their Privacy Policy can be found here: <http://www.easywebgroup.co.uk/privacypolicy/>

Their registered address is:

Units 15-17 Strixton  
Wellingborough

Northamptonshire NN29 7PA

ICO Registration Number: Z8069187

Coaching Connexions may receive your application via the ATS directly via your application for a position on our website or via embedded links in advertisements for vacancies placed with a variety of job boards either on our behalf by Easyweb or directly by us.

**For Learner enquiry purposes** we capture personal data via web forms embedded in our website. Any personal data collected will be used for the purposes outlined in this document.

All Personal data collected will be subject to the Coaching Connexions Privacy notice and those of the relevant funding partners as detailed in this document.

## **Information Collection And Use**

When you complete one of our website forms, we collect and store certain pieces of Personal Data and other information relating to you. What we collect will be linked to the nature of your enquiry and purpose for engaging with us. To help clarify this we have separated the document in to sections which cover

1. General provisions applicable to anyone using our website.
2. Learner Enquiries including Course Enquiries, Event Bookings or Applications for Courses
3. Employment applications with the business

### **Section 1 General Provisions**

We collect and store information relating to when and how you use the Website, including (but not limited to) activity data, location data, weblogs and other communication data, although we do not knowingly collect any Personal Data as part of these activities.

#### **Where, how and for how long we store your Personal Data**

The information that we collect from you (including any Personal Data) may be transferred to, and stored at, various destinations. Whilst this will not normally include destinations outside the European Economic Area (EEA for systems under our control), It may be processed by staff operating at various locations outside the EEA who work for one of our IT service providers including hosting, connectivity or telecommunications.

Examples of this would be services which utilise global business solutions e.g, Google GSuite, Amazon Cloud Services, Microsoft Azure which for the purposes of backup, disaster recovery, load balancing means that data systems using these platforms can pass through or be stored outside the EU. However, these providers have established robust measures and procedures to ensure data integrity and compliance with the regulations. To see exemplar information relating to Google's GDPR compliance provisions please visit <https://cloud.google.com/security/gdpr/resource-center/>

By providing us with your information (including Personal Data), you agree to it's transfer, storing and processing as outlined. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your information transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

For Course Enquiries or Event Bookings we will store your Personal Data for no more than one year after your initial enquiry/booking. Should you wish to remain in contact with us for the purposes of receiving further marketing or event information beyond this time you will be asked to provide additional consents to do so.

For active Learners we will store your Personal Data for marketing purposes for no more than one year after you complete your education with Coaching Connexions, at which time your Personal Data for this purpose will be irretrievably deleted. Personal Data linked to your studies, funding, assessment and achievement will be retained in line with our statutory and contractual requirements and those of our funding partners as outlined in our data retention schedule.

For applications for employment we will store your Personal Data for a period of 6 months after the closing date of the vacancy to which you have applied for candidates who were not shortlisted for positions, 12 months for candidates who were shortlisted and interviewed for positions. The details for successful applicants will be transferred to your employment records with the business and retained in line with our data retention policies and statutory obligations, the details of which can be found here: [Privacy Notice - Workforce Data](#)

### **How we use the information that we collect from you**

We use information collected from you to provide the functionality of the Website. We also use the information:

- To contact you regarding your legitimate interest in the college; information relating to your application, enquiry or event booking.
- To communicate with you on matters relating to your enquiry, event booking or application, or to send you promotional emails about new events or other information that we think may be of interest. You may request that we stop using your information for direct marketing purposes at any time and without giving any reason.
- To further your application for employment
- To help us improve the Website.
- To help us understand behaviour and improving processes. This involves us combining your anonymised information with anonymised information provided by other students

### **Communications**

Your data will be used by Coaching Connexions Limited only in order to contact you about your legitimate interest in the college, be that a course or employment application, course enquiry or event booking.

For information collected in respect of course or event enquiries we may use your data in extra marketing collateral, such as emails. We will always give you the choice to opt out of any marketing we send you.

### **IP Addresses**

We collect and store information about your Device, including where available your IP address, operating system and browser type. This is anonymous statistical data about your browsing activities

and patterns, and does not contain any Personal Data.

What we share with third parties

We use analytics technologies provided by Google Analytics and other third parties. This involves cookies being set via our Website, which then collect information about your usage of our Website. This information is anonymous and does not contain any Personal Data.

### **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

Unless you have adjusted your browser setting so that it will refuse cookies, we will drop cookies onto your Device as soon as you visit our site. Persistent cookies enable us to track and target your interests to enhance your experience on our Website. For example, we use this data to understand how you interact with our Website so we can make improvements to the information and design of our Website.

### **Your consent**

By agreeing to the terms of this Privacy Policy, you consent to the cookies referenced above being set on your Device.

### **Security**

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

## **Section 2 Learners, Course Enquiries and event bookings**

### **What information we collect from you**

- your name
- Address
- Email address
- telephone number
- Course, event or other location information.
- Other information concerning the nature of your enquiry.

We will use this information for the purposes outlined in section 1 above and will communicate with you in line with the general provisions as stated in section 1.

### **Section 3 Employment Applications**

Please refer to the employment related provisions outlined in section 1 in conjunction with the specific provisions detailed here.

### **What information we collect from you**

When you register with us (whether via the Website or otherwise), we collect and store certain pieces of Personal Data and other information relating to you, including:

- Full name
- Contact details, including email address, address, telephone numbers including mobile numbers,
- Work history, education, training, skills, experience, position held, dates of employment and any other information included in your CV including names of current and previous employers
- Details of job preferences
- Names and contact details of referees where provided
- Sensitive personal data linked to equality and diversity monitoring, this information is not available to hiring managers as part of their review and assessment of applications and is limited to representatives of People Services and EasyWeb group for the purposes of statistical analysis or final inclusion in personal records of appointed candidates as part of their employment with the company.
- Answers to questions that we pose to ascertain your suitability for the job for which you are applying

We also collect and store information relating to when and how you use the Website, including (but not limited to) activity data, location data, weblogs and other communication data, although we do not knowingly collect any Personal Data as part of these activities. This information is processed in line with the general provisions outlined above.

### **Changes To This Privacy Policy**

This Privacy Policy is effective as of 24/05/2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any minor modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you by placing a prominent notice on our website.

### **Your rights under the Data Protection Laws**

You have certain rights under the Data Protection Laws, including:

1. The right at any time to withdraw your consent to our processing of your Personal Data.
2. The right to be told what Personal Data we hold about you on our database and how we process that data.
3. The right to request that we provide you with a copy (in a commonly used electronic format) of all the Personal Data that we hold about you. Unless you make repeated requests, we will not charge a fee for providing you with a copy of this data.
4. The right to request that we correct any inaccurate or incomplete Personal Data that we hold about you.

5. The right to request that we irretrievably delete all Personal Data that we hold about you (the so-called “right to be forgotten”). Note that there are limited circumstances in which we are legally entitled to refuse to comply with this request.
6. The right to request that we transmit all the Personal Data that we hold about you (in a structured, commonly used and machine readable form) to another organisation’s IT environment. Note that we are only legally obliged to comply with this request if it is technically feasible for us to do so.

#### **Corrective actions and updates to personal data**

All staff and students (including applicants for positions or courses) are responsible for checking that information they provide to us in connection with their employment or studies is accurate and up to date. Any changes to personal data provided (e.g. change of address) must be promptly notified, in writing, to us. We cannot be held responsible for errors unless the member of staff or student has properly informed the us about them.

#### **Contact Us**

If you have any questions / queries about this Privacy Policy, please contact us on 0151 523 0544 and we will liaise with you and the relevant funding/delivery partner where appropriate.

In the first instance please contact: [info@coachingconnexions.co.uk](mailto:info@coachingconnexions.co.uk)

If you have a specific enquiry relating to learners or staff please contact either:

Learner related enquiries via [info@coachingconnexions.co.uk](mailto:info@coachingconnexions.co.uk)

Employment related enquiries via [people@accesstomusic.ac.uk](mailto:people@accesstomusic.ac.uk)