

City & Guilds Group Consultant Privacy Policy

Introduction

The City & Guilds Group is committed to data security and the fair and transparent processing of personal data. This privacy policy (**Policy**) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (**GDPR**).

The Policy applies to:

- 1 individuals engaged by a member of the City & Guilds Group; and
- 2 individuals that may be engaged by customers of the City & Guilds Group in connection with the provision of training, assessment, or certification services,

including Associates, External Quality Assurers, External Verifiers, Examiners, Invigilators, Markers, Moderators and End-point Assessors (referred to in this Policy as **Consultants**).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

Who are we?

The City and Guilds of London Institute is a charity incorporated by Royal Charter, with registered charity number 312832 (England and Wales) and SC039576 (Scotland) (**City & Guilds**). Our registered address is 1 Giltspur Street, London EC1A 9DD.

For the purposes of the GDPR, City & Guilds is the 'controller' of the personal data you, as a Consultant, provide to us or one of our associated companies (together the **City & Guilds Group**).

If you have any queries about this Policy, the way in which members of the City & Guilds Group process your personal data, or about exercising any of your rights, please send an email to gdpr@cityandguilds.com or write to Data Protection, City & Guilds, 1 Giltspur Street, London EC1A 9DD.

What personal data do we collect?

Information you provide to us

We collect and process the personal data that you provide to us when you apply to become a Consultant including your name, email address, address, telephone number, date of birth, National Insurance Number, bank account details, work history, and reference details.

Sensitive personal data

In certain limited cases, we may collect sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental

health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so on the basis of your explicit consent.

If you chose to complete our equality and diversity form, we will collect information about your ethnicity, health, sexual preference, and religious beliefs. This information will be kept strictly confidential, and will only be used to analyse data to ensure we're being fair in our recruitment and contracting, with all backgrounds being represented.

If you are applying to become an Associate, we request that you provide details of any criminal convictions, and the penalty imposed, whether or not regarded as spent under the Rehabilitation of Offenders Act 1974. This information will be shared with City & Guilds Safeguarding team. You are also asked to provide your reference if you are Disclosure and Barring Service (DBS) approved, as this may be a requirement of the role.

How do we use your personal data?

Contract performance: we may use your personal data in connection with the performance of any contract between us, to take steps linked to a contract, and to communicate with you in relation to the administration and performance of the contract.

Legitimate interests: we may use your personal data where it is necessary for purposes which are in our, or third parties, legitimate interests including providing you with newsletters, surveys, and information about our products and services, awards, events, and other industry information.

You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

Consent: we may process your sensitive personal data when we have obtained your explicit consent to do so.

Where required by law: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

Who do we share your personal data with?

We may share your personal data with members of the City & Guilds Group. You can read more about our group companies at www.cityandguildsgroup.com

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

If you are providing or applying to provide services to a customer of the City & Guilds Group, including centres, training providers, executive coaching clients, we may provide your personal data to such customers to enable the provision of services to those customers.

We may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, subject matter experts and other professional experts;

- service providers contracted to us in connection with provision of the products and services such as providers of IT services, payroll services, and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipients is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

How long will you keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of 6 years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

You may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

Where do we store your personal data and how is it protected?

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are

legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have queried the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Contact

If you have any queries about this Policy, the way in which City & Guilds processes personal data, or about exercising any of your rights, please send an email to gdpr@cityandguilds.com or write to Data Protection, City & Guilds, 1 Giltspur Street, London EC1A 9DD.

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a

remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Changes to our Policy

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.