



Career Seekers Direct Data Policy

This Data Policy describes how Career Seekers Direct Limited protects and makes use of the information clients provide us with.

About this document

This Data Policy explains how Career Seekers Direct Limited (“we”, “our”, “us”) collects, uses and shares our client’s personal data, and our client’s rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective client’s of Career Seekers Direct Limited (“you”, “your”).

Career Seekers Direct Limited is the data controller of our client’s personal data and is subject to the Data Protection Act 1998 (“DPA”) to the General Data Protection Regulation (the “GDPR”).

Who does this apply to?

People who use or may use our services. This includes for example:

- visitors to our website
- all individuals (including those aged under 18) who undertake a course with us
- clients who purchase services from us
- employers/organisations who take a learner on work experience or placement
- individuals and organisations who request information from us.

If you are asked to provide information to us, it will only be used in the ways described in this Privacy Notice.

This Privacy Notice is updated from time-to-time. The latest version is published on our website.

How we collect your information

We may collect your personal data in several ways, for example:



- from the information you provide to us when you interact with us before joining, for example when you express your interest in our services;
- when you apply to buy services from Career Seekers Direct and complete registration forms;
- when you communicate with us by telephone, email or via our website or social media, for example in order to make enquiries or raise concerns;
- in various other ways as you interact with us during your time as a client of Career Seekers Direct Limited, for the various purposes set out below;
- from third parties, for example from your previous or current school, sixth form college, FE college or university or employers who may provide a reference about you or who may sponsor your access to our services

The types of information we collect

We may collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality, birth certificate number and information about your next of kin, financial information i.e. bank details
- company information e.g. financial, staff, training needs analysis
- website usage data
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study, examination results and any learning support which you may have received
- We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your learner record
- information about your family or personal circumstances, and both academic and extracurricular interests, in order to provide you with appropriate pastoral care
- sensitive personal data and information about criminal convictions and offences, including: information concerning your health and medical conditions (e.g. disability and dietary needs); information about criminal convictions you may have
- information about your sex, disability, racial or ethnic origin; religion or similar beliefs; and sexual orientation

How we use that information



Collecting this data helps us provide you with a service which meets your needs.

Specifically, we may use data:

- to meet our legal and statutory duties and responsibilities
- to process applications, enrolments and workforce development programmes and contracts
- for our own internal records so that we can provide you with a high-quality service
- to contact you in response to a specific enquiry
- to customise our services so they work better for you
- to contact you about services, products, offers and other opportunities provided by us which we think may be relevant to you
- to contact you via e-mail, telephone or mail for research purposes
- to be shared with other organisations for education, training, employment and well-being related purposes, including for research

At no time will we assume your permission to use information that you provide for anything other than the reasons stated here.

How we use information about our clients

The purposes for which we may use personal data (including sensitive personal data) we collect during a client's association with us include:

- recruitment and enrolment onto our courses, including:
- the provision of our core teaching and learning services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification)
- maintaining client's records

non-academic matters in support of our core services, including:

- providing client's support services
- monitoring equal opportunities
- safeguarding and promoting the welfare of our clients
- ensuring clients' safety and security
- managing the use of social media
- administering finance

other administrative purposes, including:

- carrying out research and statistical analysis;



- carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations)
- providing operational information (e.g. providing IT support, information about building closures or safety advice)
- promoting our services (e.g. providing information about events happening)
- preventing and detecting crime
- dealing with grievances and disciplinary actions
- dealing with complaints and enquiries.

Security

We will hold your information securely.

- To prevent unauthorised disclosure or access to your information, we have implemented strong organisational and technical security safeguards.
- We also follow stringent procedures to ensure we work with all personal data in line with the GDPR.

The basis for processing your information and how we use it

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you have received or service, as part of the enrolment process (e.g. to send you information or answer enquiries about our services);
- once you have enrolled, to provide you with the service you have requested
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interest. In this respect, we may use your personal data for the following:

- to monitor and evaluate the performance and effectiveness of the services including by training our representatives or monitoring their performance
- to maintain and improve the organisation
- to promote equality and diversity throughout



- to seek advice on our rights and obligations, such as where we require our own legal advice;
- recovering money, you owe to us
- for recognition awards

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements
- for the prevention and detection of crime
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional)
- it is necessary to protect your or another person's vital interests
- we have your specific or, where necessary, explicit consent to do so

Sharing information with others

We do not sell or rent your personal information. Your information may by necessity be disclosed to appropriate representatives of Career Seekers Direct Limited and to government bodies (to fulfil our statutory responsibilities) such as the Education and Skills Funding Agency, Ofsted, the Department for Education and auditors or with local partners e.g. Connexions Service, the Local Authority, LEA and Local Children's Authority (safeguarding purposes).

Information may be shared with third parties if it is in connection with the service, we are providing to you, for example we might share information with market research companies contracted to undertake work on our behalf to assess your satisfaction with our service.

We will only share your personal information with other people e.g. parents or carers, or with agencies such as the Benefits Department with your permission, or unless we have a statutory obligation to do so.

If, as part of the entry requirements for our service or if you are applying for a job with us, we need to take up a reference or obtain 'disclosure' from the Disclosure and Barring Service, we will inform you beforehand.



Any personal information we hold about you is processed in accordance with the Data Protection Act 1998 and the GDPR as of 25th May 2018

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties.

We may disclose limited personal data to a variety of recipients including:

- our representatives where there is a legitimate reason for their receiving the information
- internal and external auditors.

those with an interest in tracking client's progress and attendance, including:

- government departments and agencies where we have a statutory obligation to provide information, for example, the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes)
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
- parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);
- third parties conducting surveys, for example the National Learner Survey.

Visitors to our website

When someone visits www.careerseekersdirect.co.uk, we collect standard internet log information and visitor details of behaviour patterns. We do this to find out things such as the number of visitors to the different parts of the site. We collect the information in a way which does not identify anyone. If we do want to collect personally identifiable information through our website, we will be up front about this and will make the purpose clear.

Use of Cookies

A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.



Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they tend to visit. All cookies used by this website are used in accordance with the current Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device you should set your web browser to refuse cookies. However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you.

Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it.

Controlling Information About You

When you fill in a form or provide your details on our website, you may see one or more tick boxes allowing you to:

- opt in to receive marketing communications from us by e-mail, telephone, text message or post
- opt in to receive marketing from our sponsors, third party partners by e-mail telephone, text message or post.

If you have agreed that we can use your information for marketing purposes, you can change your mind easily, via one of these methods:

send an e-mail: enquiries@careerseekersdirect.co.uk

write to us:

Career Seekers Direct Limited, 6 Hornton Grove, Hatton Park, Warwick CV35 7UA

We will not lease, distribute or sell your personal information to third parties unless we have your permission, or the law requires us to.



Links from Our Site

Our website may contain links to other websites. Please note that we have no control of websites outside of www.careerseekersdirect.co.uk. If you provide information to a website to which we link, we are not responsible for its protection and privacy. You are advised to read the privacy policy or statement of other websites prior to using them.

People who use our services

We hold the details you provide us with in order to deliver our services which meet your specific needs.

We only use these details to provide the service you have requested and for other closely related purposes. For example, we might use information about people who have enquired about a service to carry out a survey to find out if they are happy with the level of service they have received.

You can request that we stop contacting you at any time.

Information may by necessity be disclosed to appropriate representatives of Career Seekers Direct Limited and to government bodies (to fulfil our statutory responsibilities) such as the Education and Skills Funding Agency, Ofsted, the Department for Education and auditors or to local partners. If, as part of the service, we need to take up a reference or obtain 'disclosure' from the Disclosure and Barring Service, we will inform you beforehand.

Any personal information we hold about you is processed in accordance with the General Data Protection Regulation.

People who request information from us

If you request information from us by letter, telephone, email, submitting an enquiry on the website or from a sales appointment, we will make a record of that enquiry and will use the information you give us to provide you with a response. We will only use the information for these purposes and to provide a follow up service to ensure that we provided you with what you asked for.

You can request that we stop contacting you at any time.



Any emails sent to us, including attachments, may be monitored. Please be aware that you have a responsibility to ensure that any email you send us is in the bounds of the law.

International data transfers

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area (“EEA”), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

Career Seekers Direct Limited use Dropbox and OneDrive as data storage facilities. All files stored online by Dropbox and OneDrive are encrypted and kept in secure storage servers. Storage servers are located in data centres across the United States.

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies, so you can understand the manner in which your personal information will be handled by these providers.

Remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are in the UK and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.



Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

Payment

Our store is hosted on Wix.com. They provide us with the online e-commerce platform that allows us to sell our products and services to you.

Your data is stored through Wix's data storage, databases and the general Wix application. They store your data on a secure server behind a firewall. Any data gathered during the purchase process will be stored in a separate list to newsletter signups, for example.

Payments may be processed via PayPal or Stripe. This means during the transaction; your data will be shared with PayPal or Stripe for the purposes of processing your transaction.

If you choose a direct payment gateway to complete your purchase, then WooCommerce stores your credit card data. It is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.

PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

Changes to your personal data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by contacting us via :

sending an e-mail: enquiries@careerseekersdirect.co.uk

writing to us:



Career Seekers Direct Limited, 6 Hornton Grove, Hatton Park, Warwick CV35 7UA

How long your information is kept

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after your association with us has come to an end. However, some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes (for the purposes of supporting your lifelong relationship with Career Seekers Direct Limited).

Your rights

Under the DPA you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you
- to require that we cease processing your personal data if the processing is causing you damage or distress
- to require us not to send you marketing communications.

You will also have the following additional rights under GDPR

- to require us to correct the personal data we hold about you if it is incorrect
- to require us to erase your personal data
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

To make a request for a copy of the data we hold on you please contact enquiries@careerseekersdirect.co.uk

We must have at least one of the following forms of ID when information on your personal data is requested:



Passport, Driving licence, birth certificate, utility bill (from the last 3 months)

Complaints or Queries

If you have any questions about our collection and use of personal data, please contact us. We are happy to provide additional information if it is required.

Changes to This Privacy Notice

We will keep this Privacy Notice under regular review and reserve the right to change it as necessary from time-to-time or if required by law. Any changes will be immediately posted on the website.