

# Privacy Notice May 2018

# **Together Training Privacy Notice**

The following information explains how Together Training collects, retains and uses any data we collect on you as an individual. Up until 24 May 2018 any personal data held by Together Training was used in accordance with the Data Protection Act. From 25 May 2018 personal data will be kept and used in accordance with General Data Protection Regulations (GDPR).

# When do you collect my data?

At Together Training we collect your data in a limited number of ways. In addition to gaining information from you, online data is also taken from you at moments such as when:

### You make an enquiry

• For example: register to attend a business event; a request to call you back; submit data at an event

# What data do you collect when I'm browsing your website?

Our monitoring of site activity includes recording the popularity of the site, visits to individual pages and typical user paths through the site. The data we may collect here could include IP address, the pages you visited and for how long.

### Cookies

We use cookies and pixels to optimise your experience on our site to provide social media features and analyse traffic to site pages. Cookies and pixels are small pieces of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing.

This means that when you're browsing for a particular apprenticeship and leave our site, you might start to see advertisements inviting you back to our website to pick up where you left off or browse similar apprenticeships related to those you're interested in.

On our website we use first-party cookies, such as the Google Analytics cookie, and third-party cookies and pixels through our trusted social media, advertising and analytics partners (such as Google advertising cookies, Facebook pixels and Retargeting pixels). By continuing to use our website you consent to our use of cookies and pixels – you can learn more about the use of these below.

### **Google Analytics**

We use Google Analytics to monitor traffic on our website, this allows us to measure the quantity of visitors to a particular section of the site and report on overall site performance by considering a number of metrics – you can learn more about Google Analytics here. While Google Analytics enables us to report on the number of visitors to the site, it does not allow us to identify users directly.

As with our use of cookies, we keep track of Google Analytics data to help shape our apprenticeship offer and understand better which provisions are more popular for our site users. To enable us to improve each year, we use the figures provided by Google to compare key site metrics such as: unique visitors to a page, number of applications to a course, page abandonments and error reports. These allow us to improve your experience on our site. Our retention for Google Analytics data is currently set to 38 months.

You can opt-out of Google Analytics Advertising Features through Ads Settings, Ad Settings for mobile apps, or any other available means (eg, the NAI's consumer opt-out).

### Retargeting/Display advertising

Together Training collects some data about your activities that does not personally or directly identify you when you visit our website, the website of entities for which we serve advertisements (our "Advertisers") or the websites and online services where we display advertisements ("Publishers").

This information may include the content you view, the date and time that you view this content, the apprenticeships you register interest in, or your location information associated with your IP address. We use the information we collect to serve you more relevant advertisements (referred to as "Retargeting"). We collect information about where you saw the ads we serve you and what ads you clicked on.

### Akero (NetNatives)

We use Akero forms and landing pages to capture data, these data capture points are used to manage general enquiries, business event registration and apprenticeship interest. When you submit data to these forms you will be prompted to opt in to wider communications, should you wish to receive them.

Your personal data will be stored securely in Akero and will only be used to contact you regarding the event, apprenticeship or enquiry related to your submission. For more information on how your data is stored, please refer to the NetNatives privacy policy **here.** 

Any sensitive personal data will be collected transparently through the forms mentioned in the above section.

## How long do you keep my data?

We keep your data only for legitimate reasons and processing. The period for this is set, but we will give you the option to grant consent to keeping your data longer than usual so we can stay in touch for an extended period.

Our Retention Schedule is an outline of how long we keep personal data and on whom. This schedule is in line with legitimate interest (ie, to provide you with a good service). Dates for deletion may be extended with your consent.

### Here are some examples of our data retention schedule

- If you enquire about and apprenticeship, we will keep your personal data for up to a year.
- If you **take on a** full-time apprentice, we will keep your personal data for up to six years after your most recent apprenticeship enrolment.
- If you **register** to attend a business event, we will keep your personal data until you unsubscribe from our business event mailing list.

# What are my rights regarding my personal data?

The key rights you should be aware of are as follows.

### You can:

- Withdraw consent (where this is Together Training's legal basis for processing/retaining your data).
- Rectify any inaccuracies in personal data we hold about you.
- Access a full report of your personal data that we process.
- Be forgotten that is have your details removed from our systems that we use to process your data.
- Restrict/object to certain aspects of the processing of your data.

Please see https://ico.org.uk/ for further information on the above rights.

# Who do you share my information with?

Together Training is legally obliged to share some of your details with third-parties, e.g funding bodies, examination boards, local authorities and in exceptional circumstances with public services such as the police and other emergency services.

# What will you do with my data?

With your consent we may contact you by email from time to time to keep you up to date with Together Training's latest offers and courses.

There will be a clear 'unsubscribe' button at the bottom of each email should you change your mind. Should you wish to join/rejoin this mailing list, please contact marketing@westherts.ac.uk