



# The Little Learning Company

## Privacy Statement

The Little Learning Company Ltd is committed to ensuring it complies with its obligations under the General Data Protection Regulations (GDPR) 2018 and all other requirements relating to the handling of personal data.

This Privacy Notice sets out the type of information we collect and the purpose, as well as how we protect this information. This policy applies to all interaction between an individual and The Little Learning Company Ltd including accessing our website, enrolling on or completing a call or course with us and joining our mailing list.

This policy is subject to updates and changes, therefore we strongly encourage this policy is checked for any changes before sharing any personal information.

The Little Learning Company Ltd is the controller and is responsible for your personal data – both its use and protection (which will be referred to as LLC, we, us or our in the remainder of this privacy policy).

We have appointed a data protection officer (DPO), who is responsible for overseeing this privacy policy. If you have any questions about this privacy policy, please contact the DPO using the details set out below.

If you are engaged with a service or provision from us that is funded by a third party, the third party's Privacy Notice will also be shared with you prior to your consenting to the sharing of personal information.

We may also at times collect, use and share aggregated data such as demographic or statistical data. This type of data may be derived through personal data but is not classed as such in law as this data will in no way identify you personally, either directly or indirectly.

For example, we may use aggregated data to compile the percentage of people accessing our website and signing up to our mailing list or percentage of people from certain counties signing up to a service or provision.

Whilst we do not collect any personal data around protected characteristics, certain provisions may require this information as a requirement of the funding for the provision you are accessing. Whilst you maintain every right to not share any personal information requested, this may mean we are unable to fulfil your request of accessing provision if such information is required by funding provider.

We will always inform you as to the purpose of supplying such information prior to giving your consent and we will never sell your data to a third party.

We will never keep your data for any longer than is required to fulfil any legal, contractual or reporting requirements that the data may be subject to, as well as for accountancy purposes such as auditing. For most purposes relating to the activities of the company, this will mean your details may be kept on file for up to ten years before being securely destroyed.

## Information Collected

When browsing our website we do not collect any personal or identifiable information about you.

We do collect analytical and statistical information regarding website views and interactions. These include IP address, operating system and browser, website you were directed from, pages viewed, files downloaded and the date/time of these interactions.

We do not use any of this information to build profiles based on this information, nor is this information stored and held long-term; logs are wiped regularly.

You may share personal information with us through interacting or accessing our services, such as joining the mailing list or enrolling onto one of our courses.

We may collect the following information from you as part of this to be able to provide the most appropriate service, assist with any enquiries and in some instances, to comply with the requirements of the funder for any grant supported provision.

### **The types of information collected may include:**

- Name (including surname on 16th birthday)
- Address
- Contact details including phone number and email address and those of your next of kin
- Date of Birth
- Gender
- Current employment status
- Previous employment, education and work-related activities
- Nationality, ethnicity and whether you were born in the UK
- Learning difficulty / disability Information
- Payment details, such as debit or credit card details, if making a purchase
- Welsh language education information and preferred language of communication or learning
- Preferred method of communication

## How we collect your information

This information may be collected in several ways:

- Through the enrolment process or registration form for the provision you are enrolling on
- Through course documentation throughout the duration of the provision, such as through attendance logs
- Through individual evaluation and feedback upon completion of the provision
- Through completing registration details to register with an Awarding Body for certification of an accredited provision
- Through referrals received by an external organisation
- Through contact or enquiries received via email, phone or social media
- Through completing expression of interest forms, contact details or joining our mailing list through our website or at an information event

With the information collected, on occasion we may share it with the following external organisations. We will only share the minimal, necessary information and this will always be done via a secure channel. As a learner, you have the right to withdraw consent to the sharing of this information.

However, it is important to note that due to the requirements of some funding and/or funding providers, without certain information they will not be able to allocate the funding for some types of provision.

Where we are working in partnership with another organisation, such as on a funded provision, the privacy notices of the organisations that handle your personal data will be made available to you before giving your consent to share your data.

## The types of organisations we work in partnership with:

- Coleg Cambria (A data processor for specific funding streams)
- Local authorities
- Other education providers (Partner providers/Universities/other agencies)
- Welsh Government
- Employment Associated organisations (DWP, Communities for Work Plus)
- Third sector and voluntary sector partners
- Estyn

## The purpose for processing a learner's data can be for the following:

- Future planning of provision of education provision offered
- Staff training and development
- Safeguarding, health and wellbeing concerns
- Monitoring, auditing and compliance requirements
- Promoting upcoming projects and learning opportunities
- Learner feedback and evaluations of provision offered
- Supporting evidence for future funding applications
- Ensuring the quality of provision offered

## Security

We make every reasonable effort to maintain the security of your personal data. All of our computers are password protected and only accessible to authorised staff with all personal data stored digitally and securely.

This website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit, as well as reading privacy policies of other parties handling or processing your data for any grant funded provision, which will be made available to you.

## Our Legal basis for Data Processing

Under General Data Processing Regulations (referred to as GDPR), in order to process your personal data, we need to have a legal basis to do so as stipulated within the regulations.

### **Our legal basis for processing your information:**

- To be able to have forms of communication available to contact you about any course or session you have enrolled on with us, prior to the course of session commencing.
- To be able to evidence your learning, attendance or engagement where there is a contractual requirement for us to do so to funders of a grant funded provision.

Should you make a purchase of a service from us, the processing of data allows us to be able to fulfil this as performance of a contract with you.

To monitor the security, performance and accessibility of our website, as well as assist us develop and shape our marketing strategy through the use of cookies.

As a training and education provider we may process your data in order to comply with all safeguarding, prevention and detection of crime (including PREVENT) and for any criminal investigation or procedures we are required to under relevant legislation.

Where we have explicit consent to such as joining our mailing list through our website or at a networking or information event.

## Subject Access Requests

You have the right to request a copy of the personal data that we hold about you; this is known as a Subject Access Request or SAR. Please send your SAR, or any of the other requests listed below, in writing to:

**The Data Protection Officer  
The Little Learning Company Ltd  
16 Hafod Alyn  
Mold  
Flintshire CH7 1RF**

Or via email to: [info@thelittlelearningcompany.co.uk](mailto:info@thelittlelearningcompany.co.uk).

We will respond within one month of receiving your request.

**Right to rectification** If you believe that the data we hold about you is incorrect, you can request that we correct it.

**Right to erasure** You have the right to request that your personal data be erased. Note that in certain circumstances we will not be able to erase all of your data immediately because we need to retain certain types of data for minimum periods to satisfy legal and contractual requirements for services you have accessed.

**Right to restriction** You can ask us to restrict our use of your personal data if you believe that it is not accurate, or has been used unlawfully, or is no longer relevant, but you don't want us to delete it.

**Right to object** You have the right to object to us using your personal data for our legitimate interests.

**Right to data portability** You have the right to ask us to provide the data that we hold about you in a commonly used format, e.g. as an Excel spreadsheet.

If you have a complaint about how we have kept your information secure, or how we have responded to a request to access, update, restrict or erase your data, you can refer us to the Information Commissioner's Office (ICO).