


Policy/procedure	Privacy Policy
Senior Manager Responsible	Gary Wiswell 
Author	Gary Wiswell
Approved by	SMT
Date approved	17/12/24
Next review date	17/12/25
Changes made	Update references to reflect Data Protection Act 2018 and UK GDPR. Explicitly state lawful bases for processing personal data. Add specific data retention periods for different data types. Include all data subject rights under UK GDPR. Update ICO contact details for complaints. Provide clarity on cookies and third-party analytics tracking. Address requirements for international data transfers

FLM Training are committed to protecting your personal data. This policy explains how and why we use your personal data to make sure you remain informed and in control of your information.

FLM Training will ask its learners or potential learners to “opt-in” to receive information about our products and courses. This means you’ll have the choice as to whether you want to receive these messages.

You can choose not to receive information or change how we contact you at any time. If you would like to, please let us know by:

Emailing: info@flmtraining.co.uk

Writing to us at our company address:

FLM Training
Atlas House
Caxton Close
Wigan
WN3 6XU

Telephone: 01942 255913 (Mon to Fri: 8.30am – 4.30pm - Sat and Sun: Closed)

We will never sell your personal data. We may share personal data with other organisations who we work with to provide the service to you. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

Questions

Any questions you have about this policy or how we use your personal data should be sent to: info@flmtraining.co.uk or addressed to: The Data Protection Officer at the postal address given above.

About Us

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you) will be collected and used by FLM Training which is a Private Limited Company with Company No: 08384009 and Data Controller No: ZA002836.

This policy complies with the **Data Protection Act 2018**, incorporating the UK General Data Protection Regulation (UK GDPR), which governs the collection, processing, and protection of personal data in the UK.

For the purposes of data protection law, FLM Training will be the Data Controller.

What information do we collect?

Personal data you give to us

We process personal data under the following lawful bases:

- Consent (e.g., for marketing communications).
- Performance of a contract (e.g., apprenticeships and training agreements).
- Legal obligation (e.g., regulatory reporting and safeguarding).
- Legitimate interests (e.g., monitoring learner progress, improving services).
- Financial information (payment information such as credit/debit card or direct debit details).

Information created by your involvement with FLM Training

Your activities and involvement with FLM Training create additional personal data, for example, information about your education progress and qualifications.

We may analyse your personal data to build a profile which helps us decide which of our communications you might be interested in.

Information from other organisations

We sometimes receive personal data from other organisations, for example, where they have passed us information about people who are interested in our apprenticeships and training courses.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

We may also use other organisations to help us conduct research and analysis on personal data (and this can result in new personal data being created).

Sensitive personal data

We may collect, or store data known as sensitive personal data (such as information relating to additional learning needs or ethnicity). We will do this where we have been asked to do so by official Government agencies or where the information is needed for the assessment of additional educational support needs.

If we do this, we'll take extra care to ensure your personal data is protected.

Accidents or incidents

If an accident or incident occurs in one of our training centres or involving one of our employees, then we'll keep a record of this (which may include personal data and sensitive personal data).

How do we use personal information?

We only ever use your personal data with your consent, or where it is necessary:

To enter into, or perform, a contract with you

To comply with a legal duty

To protect your vital interests; this means, for example, keeping you safe from harm

For our own (or a third party's) lawful interests, provided your rights are not affected

We will only use your information for the purpose or purposes it was collected for.

Administration

We use personal data for administrative purposes. This includes:

Receiving payment (e.g. direct debits or payment card details)

Maintaining databases of our learners and their educational progress

Performing our obligations under apprenticeship or training contracts

Helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

Marketing

We use personal data to communicate with people and to promote FLM Training. This includes keeping you up to date with our news and offerings.

Research and Analysis

We may carry out research and analysis on the data we hold to understand behaviour and responses and identify patterns and trends.

We evaluate, categorise and profile personal data to tailor services and communications we send out (including targeted advertising) and to prevent unwanted material from being sent to you.

Anonymised data

We may combine sets of personal data and change the personal data so that it can no longer be linked to any particular person. This information may then be used to monitor FLM Training's business performance or to identify trends or patterns within our existing learner database.

Disclosing and sharing data

We will never sell your personal data. If you have opted-in to marketing, we may contact you with information about further opportunities in education.

We may share personal data with other organisations who provide us with services. For example, we may use an IT supplier to process personal data. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

Marketing

FLM Training will ask its learners and contacts to "opt-in" for marketing communications. This means you'll have the choice as to whether you want to receive these messages.

Young people

As an education provider, we regularly process the personal data relating to young people who enquire about courses and training opportunities.

How do we protect personal data?

We use a variety of physical and technical methods to keep your data safe and to prevent unauthorised access or sharing of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information using both physical and electronic means.

Our employees receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Payment security

All electronic forms that request financial data will use secure web technology to encrypt the data between your web browsers and our computers.

If you use a credit card, we will pass your credit card details securely to our payment provider. FLM Training complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and FLM Training. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

FLM Training complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices, so you know when CCTV is in use.

Storage of personal data

Personal data will be retained for:

- **Learner records:** 7 years after the completion of training or apprenticeship, in line with funding and audit requirements.
- **Financial records:** 6 years to comply with HMRC requirements.
- **Safeguarding records:** Until the individual reaches 25 years of age, as per safeguarding guidelines.
- **Marketing preferences:** Until consent is withdrawn

In the event that personal data must be transferred outside the UK or EEA, FLM Training will ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs), to protect your data.

How long does FLM Training Keep information for?

We will only use and store information for as long as it is needed for the purposes it was collected for. How long we keep information depends on the information and what it's used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

How do we ensure that you remain in control of your data?

We want to ensure you remain in control of your personal data and that you understand your legal rights which include:

"You have the following rights under UK GDPR:

- The right to access your personal data (subject access request).
- The right to rectification of inaccurate data.
- The right to erasure ('right to be forgotten'), subject to legal and contractual obligations.
- The right to restrict processing of your data.
- The right to data portability.
- The right to object to processing, including for direct marketing purposes.
- The right to lodge a complaint with the Information Commissioner's Office (ICO).

Complaints

You can complain to FLM Training directly by contacting our Data Protection Officer using the contact details set out above. If you would like to make a complaint which does not directly relate to your data protection and privacy rights, please see FLM Training's complaints policy which is available [here](#).

If you are unhappy with how we have handled your data, you can complain to the **Information Commissioner's Office (ICO)**:

- Website: www.ico.org.uk
- Phone: **0303 123 1113**
- Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Cookies and links to other sites

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We use third-party analytics tools, such as Google Analytics, to monitor website performance and user interaction. You can opt out of tracking by adjusting your cookie preferences or browser settings

Links to other websites

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the web page).

If an external website requests personal information from you, the information you provide will not be covered by the FLM Training's privacy policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with FLM Training.

Changes to this privacy policy

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.