

## Privacy Notice

This privacy notice has been prepared by t2 group to comply with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

The t2 group makes decisions about why and how your personal data is used and, as such, is considered legally to be the "data controller" of the personal data. This places specific obligations on us including that personal data must be processed fairly and lawfully and in a transparent manner.

This privacy notice describes why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection.

### Data Protection & Data Processing

The Training Provider (t2 group), and Employer acknowledge that for the purposes of the General Data Protection Regulation (GDPR), the Training Provider is the Data Controller in respect of any Personal Data obtained by it from each Apprentice or the Employer for the purpose of the Training Services.

Each party shall process Personal Data only in accordance with the GDPR and where necessary on the other party's instructions from time to time and shall not process the Personal Data for any purposes other than those expressly authorised.

Each party shall take reasonable steps to ensure the reliability of all its employees who have access to Personal Data.

Each party warrants to the other that it will process the Personal Data in compliance with all applicable laws, enactments, regulations, orders, standards and other similar instruments.

Each Party warrants that, having regard to the state of technological development and the cost of implementing any measures, it will take appropriate technical and organisational measures against the unauthorised or unlawful processing of Personal

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Data and against the accidental loss or destruction of, or damage to, Personal Data to ensure a level of security appropriate to (i) the harm that might result from such unauthorised or unlawful processing or accidental loss, destruction or damage; and (ii) the nature of the data to be protected.

Each party agrees to indemnify and keep indemnified and defend at its own expense the other party against all costs, claims, damages or expenses incurred by the other party or for which the other party may become liable due to any failure by the first party or its employees or agents to comply with any of its obligations under this section.

### Why do we process data?

The purpose of processing your data includes:

- the provision of education, training, coaching and associated services (e.g. registration, assessment, apprenticeship, qualification).
- to fulfil the contract with the learner.
- maintaining learner records.
- promoting the welfare of learners.
- to communicate with you for all matters relevant to your interaction with t2 group.
- providing resources, IT and information services.
- administering learner finances.
- equal opportunities monitoring.
- evaluating the performance and effectiveness of t2 group assessors/coaches including research and statistical analysis.
- to meet our compliance and regulatory obligations.
- dealing with disciplinary matters.
- dealing with complaints.

### The legal basis on which we collect and use your personal information

We will only use your personal information when we have a lawful basis for doing so. Most commonly, we will use your personal information in the following circumstances:

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- where you have consented to the use following a positive opt-in
- where there is a contract with you and a need to process your personal data to comply with obligations under the contract
- where we need to process the personal data to comply with a common law or statutory obligation
- where processing is necessary to protect the vital interests of the data subject (you) or of another natural person
- where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (t2 group).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

### What information do we collect about you?

We collect information about you when you start an apprenticeship or make an application for employment with us. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage information is collected using cookies.

When signing an apprenticeship agreement with t2 group, you will be provided with a privacy notice at enrolment which summarises this document containing the reasons and basis for the data we capture and our obligations to retain it for the period specified by the relevant funding contract. If you enrolled before 25th May 2018, the privacy notice that you signed will be held within your enrolment paperwork.

We source personal data from a variety of places such as public sources, publicly available websites, social media, directly from businesses, third party suppliers such as Market Location and Newscast24. For example, if you have a profile online, we may combine that type of information with the information you provide to us directly.

### How will we use the information about you?

t2 group is the data controller of personal information about you.

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We collect information about you to process your application, manage your apprenticeship and if you agree, to contact you about further training and services we think may be of interest to you.

t2 group will not share your information for marketing purposes. Access to your personal data is only provided to our staff when it is being processed. We may need to provide your personal data to third parties who may include Government agencies (including Welsh Government and the Education and Skills Funding Agency), Awarding Bodies (including City & Guilds, ILM, OCR, Pearson) and regulatory bodies (including Ofsted and ESTYN) to obtain funding and accreditation on your behalf. We may also review your data for GDPR compliance on a periodic basis with specialist third parties.

### Retention Periods

t2 group will retain your personal data for no longer than is necessary to fulfil its contractual and regulatory obligations in line with our retention policy, which can be made available upon request. Any variances to this will be expressly agreed with you.

### Your Rights

You have a number of rights over your personal information, which are:

#### 1. The right to be informed

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

#### 2. Right of access

You have a right of access to your own personal data held by t2 group. A request to see the personal data held by t2 group can be made through a Subject Access Request by emailing or writing to us using the contact details provided below.

#### 3. The right to rectification

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You have the right to have inaccurate personal data held by t2 group rectified or completed if it is incomplete. This can be done by emailing or writing to us using the contact details provided below.

#### **4. The right to erasure**

Once personal data collected by t2 group is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased. t2 group manages the retention period of data held through its retention schedule.

#### **5. The rights to restrict processing and to object to processing**

In certain circumstances, you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

#### **6. The right to object to processing**

You have the right to object to:

- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

t2 group will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

#### **7. Rights to data portability**

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. t2 group will respond to any Subject Access Requests in compliance with this.

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**Education & Skills  
Funding Agency**

**Please note:**

Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>

**How we transfer your personal information outside Europe**

We do not store or transfer your personal data outside Europe.

**Automated decisions we take about you**

We do not make automated decisions using this information.

**Marketing**

If you have consented to receive marketing communications, we will send you information about our apprenticeships/training and other companies in our group which may be of interest to you. You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of t2 group. We may use licensed third parties to provide us with regulated personal data for sales and marketing purposes.

If you no longer wish to be contacted for marketing purposes, please email [marketing@t2group.co.uk](mailto:marketing@t2group.co.uk) or use the unsubscribe link provided in all of our marketing emails.

**Website Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to improve the experience for users by tracking visitor use of the website and is also used to compile statistical reports on website activity.

For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

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You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Our website contains links to other websites within t2 group. This privacy notice applies to all websites within t2 group.

### Changes to our privacy notice

We keep our privacy notice under regular review, and we will place any updates on our website.

### How to contact us

Please contact us if you have any questions about this notice or the ways in which we use your personal information:

- by email at [dataprotection@t2group.co.uk](mailto:dataprotection@t2group.co.uk)
- or write to us at t2 group, Melrose Hall, Cypress Drive, St. Mellon's, CARDIFF CF3 0EG.

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