

# VALKYRIE SUPPORT SERVICES LTD PRIVACY POLICY

### Scope

Valkyrie Support Services Ltd is an Educational Institution which collects and holds personal data belonging to both individuals and organisations. Valkyrie is committed to data security and the fair and transparent processing of personal data. This Privacy Policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law and in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

# Who are we?

Valkyrie Support Services Ltd is a Company registered in England and Wales with registration number 05419947. We are furthermore registered on the UK Register of Training Providers and also on the UK Register of Apprenticeship Training Providers as Provider number 10026094.

Our operating address is School House Farm, Beamhurst, Uttoxeter ST14 5EA.

#### Reasons why Valkyrie stores personal data

The personal data of individuals enrolling on training courses and apprenticeships is obtained and stored for the purpose of identification and to ensure that:

- 1. It can be assured that individuals are eligible for any government funding applicable to training schemes
- 2. Individuals can receive certification appropriate to their achievements
- 3. Valkyrie and its officers are able to make contact with individuals who are and who have been enrolled on training schemes for the primary purposes of:
  - a. Information and Guidance
  - b. Obtaining Feedback
- 4. Documentation generated during training schemes can be appropriately linked to individuals in order to comply with the requirements of the Education & Skills Funding Agency and other regulatory bodies.

# How Valkyrie obtains your personal data

Valkyrie will only store personal data belonging to individuals or organisations with their consent. Consent is ordinarily gained either in writing, with a signature against a consent statement. Where we wish to continue to store personal data and contact previous customers we will contact the organisation directly for ongoing consent.

Since personal data will always be collected through direct communication with either the individual or a consenting officer of an organisation, it will always be made fully clear as to exactly what data is being obtained and stored.

We do not collect any personal data through any automatic website function.

#### Information from other sources

Valkyrie sometimes receives data belonging to organisations from marketing agencies. Where this occurs, we will always ensure that the agency in question can prove that they themselves are fully compliant to Data Protection Legislation. Even then, Valkyrie will only utilise said data in order to make initial contact with the organisation. Where said organisation does not become a customer of Valkyrie their data will only continue to be stored for future communications with their express written consent.

## Who do we share your personal data with?

Valkyrie shares your personal data with the following organisations for legitimate purposes pursuant to the services which you procure from us:

- 1. The Education & Skills Funding Agency for the purposes of providing required evidence of our activities and in order to facilitate Apprenticeships funding.
- 2. The Institute of Apprenticeships, the National Apprenticeship Service and OFSTED as regulatory bodies your personal data may be shared with these organisations, in confidence, in order for us to prove the legitimacy of our activities.
- 3. National Awarding Bodies e.g. City & Guilds your personal data will be shared with these organisations purely so that individuals who have consented to work towards qualifications through our Centre are able to be registered, recognised and ultimately certificated by these Awarding Bodies.
- 4. Where required by law we may process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for prevention of crime or fraud.

We will not share personal data with any other party without the express consent of the person or organisation to whom the data belongs.

### **Retention of Data**

Personal data serving as evidence of learning activity required by the Education & Skills Funding Agency or any authorised regulatory body shall be retained for a period of up to seven years.

Where you have consented to our retention of your personal data for any other reason (e.g. for marketing/service updates) you may change your preferences or unsubscribe from marketing communications at any time with a short STOP response.

If at any time an individual or organisation requests us to remove their personal data from their records, we will do so immediately, except in the above case where we are required by law to retain the data. In the latter case we will notify the individual or organisation in writing of exactly what data is being retained and under what authority.

## Where do we store your personal data and how is it protected?

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data breach. We will notify you and any applicable regulator of any suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of data through the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data transmitted to us electronically, until such time as it reaches our secure systems.

Within our organisation, personal data held on paper is kept in our secure office in locked metal cabinets in an office which is always manned during hours when the office is insecure. No person is permitted to access our paper-based files unless they are either a member of staff accessing them for legitimate purposes or are otherwise able to identify themselves as having regulatory authority to gain access to the files.

We store personal details electronically using an online database which is controlled and assured on secure servers controlled by a contracted organisation.

Where any personal data are stored on our own computer hard drives, such data will only be stored on machines which are not part of any sharing network and which are kept secured by continuously updated internet security software. Personal data is not permitted to be carried electronically on any device being removed from our secure office location.

### **Rights**

Under the GDPR you have various rights with respect to our use of your personal data:

## **Right to Access**

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond within 30 days of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information, or if your request is manifestly unfounded or excessive.

# **Right to Rectification**

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up to date.

#### **Right to Erasure**

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

### **Right to Object**

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data or if your data is being

processed for direct marketing purposes. If you would to object to the processing of your personal data, please contact us using the contact details provided below.

## Right to restrict processing

In certain circumstances you have the right to request that we restrict the further processing of your data. This right arises where, for example, you have contested the accuracy of your personal data and we are verifying the information. Where you have made any request of us under your GDPR rights, you may request that we restrict processing whilst we are ourselves processing your request.

## **Right to Data Portability**

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.

Please note that GDPR sets out exceptions to all the above rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

#### Contact

If you have any queries about this policy or wish to make any request of us under it please send an email to <a href="mailto:info@vsslearning.co.uk">info@vsslearning.co.uk</a> stating DATA PROTECTION in the subject line or alternatively write to THE DATA PROTECTION OFFICER, VALKYRIE SUPPORT SERVICES LTD, SCHOOL HOUSE FARM, BEAMHURST, UTTOXETER, ST14 5EA.

#### **Changes to this Policy**

We will always publish the most up to date version of this policy on our website. Please check back frequently to see any updates or changes.