

Alpha International Training Ltd. Privacy Policy

WE TAKE YOUR PRIVACY SERIOUSLY:

This Privacy Policy governs our data collection, processing, and usage practices. It also describes your choices regarding use, access, and correction of your personal information.

By using our website and by providing your personal information to us, you are consenting to the data practices described in this Privacy Policy and you also consent to our use of cookies.

We may update this policy from time to time by publishing a new version on our website, so you should check this page occasionally to ensure you are happy with any changes we have made to this policy. We may also notify you of changes to this policy by email.

1. HOW WE USE YOUR DATA

In this Section we have set out:

- (a) the general categories of personal data that we may process.
- (b) the purposes for which we may process personal data;
- (c) the legal bases of the processing.

1.1 USAGE DATA

We may process data about your use of our website and from the services we provide to you (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing and pattern of your service use. The source of the usage data is Google Analytics and our College Software. This usage may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

1.2 SERVICE DATA

We may process your personal data that is provided during our services (“service data”). The service data may include your name, email address, postal address, service preferences, and basic financial information. The source of the service data comes from you when you provide it to us when you purchase a course from us. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps at your request, to enter such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

1.3 ENQUIRY DATA

We may process information contained in any enquiry you submit to us regarding our products and services (“enquiry data”). The enquiry data may be processed for the purposes of offering, marketing, and selling relevant products and/or services to you in the future. We may also process information relating to how you have interacted with our website and any marketing we have sent you in order that we may send you any relevant communications. The legal basis for this processing is consent.

1.4 TRANSACTION DATA

We may process information relating to transactions, including the purchase of goods and services that you enter with us whether by email, over the phone or through our website (“transaction data”). The transaction data may include your contact details, your card details, and the transaction details. The transaction data may be processed for supplying the purchased goods and services and the keeping of proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

1.5 NOTIFICATION DATA

We may process information that you provide to us for subscribing to our email notifications and/or newsletters (“notification data”). The notification data may be processed for the purposes of sending you relevant notifications and/or newsletters. The legal basis for this processing is consent.

1.6 CORRESPONDENCE DATA

We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business, and communication with users.

1.7 THE ESTABLISHMENT, EXERCISE, OR DEFENCE OF LEGAL CLAIMS

We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative, or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.

1.8 COMPLIANCE WITH A LEGAL OBLIGATION

In addition to the specific purposes for which we may process your personal data set out in Section 2, we may also process any of your personal data where such processing is necessary for compliance

with a legal obligation to which we are subject, or to protect your interests or the interests of another natural person.

1.9 OTHER PEOPLE'S PERSONAL DATA

Please do NOT supply any other person's personal data to us unless we ask you to do so.

2. PROVIDING YOUR PERSONAL DATA TO OTHERS

In this section we provide you with information about which third parties we may pass your data onto.

2.1 OUR GROUP COMPANIES AND PARTNERS

We may disclose your personal data to any member of our group of companies and to our partners but only insofar as is reasonably necessary for the purposes set out in this policy.

COBIS (Council for British International Schools) privacy policy can be found here:
<https://www.cobis.org.uk/privacy-policy>

2.2 OUR PROFESSIONAL ADVISORS

We may disclose your personal data to our insurers and/or professional advisors insofar as is reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice, and managing legal disputes.

2.3 OUR TECHNICAL PROVIDERS

We may disclose your personal data to our e-learning platform, telephony and server administration providers but only insofar as is reasonably necessary for the safe and efficient storage of your data.

Our e-learning platform providers are ECORDIA and THINKIFIC and you can find their privacy policy in the following place:

ECORDIA: <https://www.ecordia.co.uk/privacy-statement>

THINKIFIC: <https://www.thinkific.com/resources/privacy-policy/>

2.4 OUR PAYMENT PROVIDERS

Financial transactions relating to our website and services may be handled by our payment services providers who are PayPal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing payments, refunding such payments or parts thereof, and dealing with complaints and queries relating to such payments and refunds.

You can find our payment providers' privacy policies in the following place:

<https://stripe.com/gb/privacy>

<https://gocardless.com/privacy/payers/>

2.5 OUR PRODUCTIVITY AND COMMUNICATION APPLICATION PROVIDERS

We may disclose your personal data while using our internal productivity and communication applications insofar as is reasonably necessary for the purposes of proper administration of our website and business.

2.6 FOR COMPLIANCE WITH A LEGAL OBLIGATION

We may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

2.7 ACKNOWLEDGEMENT OF PERSONAL DATA SPECIFICALLY SUBMITTED FOR PUBLICATION

You acknowledge that personal data that you submit specifically for publication e.g., testimonials through our website or services may then be available, via the internet, around the world. We cannot prevent the use or misuse of such personal data by others.

3. RETAINING AND DELETING PERSONAL DATA

This section sets out our data retention policies and procedure. These are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

3.1 LENGTH OF RETENTION

The periods for which we keep your information depend on the purpose for which your information was collected and the use to which it is put. Personal data that we process for any purposes shall not be kept for longer than is necessary for that purpose or purposes.

3.2 RETENTION RELATING TO A LEGAL OBLIGATION

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

4. PERSONAL SECURITY MEASURES

4.1 APPROPRIATE MEASURES

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse, or alteration of your personal data.

4.2 SECURE STORAGE

We will store all your personal data on secure servers, personal computers, and mobile devices, and in secure manual record-keeping systems.

4.3 PASSWORD STORAGE

Any passwords you provide us will be stored by us in encrypted form.

4.4 FINANCIAL TRANSACTIONS

Any data relating to financial transactions that is sent from your web browser to our web server, or from our web server to your web browser will be protected using encryption technology.

4.5 ACKNOWLEDGEMENT OF YOU TRANSMITTING UNENCRYPTED DATA

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure and we cannot guarantee the security of that data sent over the internet.

4.6 CANDIDATE USER PASSWORDS

If you are a candidate and an e-platform user with us you should ensure that your password is not susceptible to being guessed, whether by a person or a computer programme. You are responsible for keeping the password you use for accessing your portfolio confidential and we will not ask you for your password (except when you log in).

5. YOUR RIGHTS

In this Section we have summarised the rights that you have under data protection law. Some of the rights are complex and not all the details have been included in this summary. You should therefore familiarise yourself with relevant laws and guidance given under the General Data Protection Regulation (GDPR).

5.1 PRINCIPAL RIGHTS

Your principal rights under the GDPR are:

- (a) the right to access
- (b) the right to rectification
- (c) the right to erasure
- (d) the right to restrict processing of your personal data
- (e) the right to object to processing of your personal data
- (f) the right to data portability

(g) the right to complain to a supervisory authority (h) the right to withdraw consent

5.2 RIGHT TO ACCESS

You have the right to confirmation as to whether we process your personal data and, where we do, access to that personal data together certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights of others are not affected, we will supply to you a copy of your personal data.

5.3 RIGHT TO RECTIFICATION

You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

5.4 RIGHT TO ERASURE

In some circumstances you will have the right to the erasure of your personal data. Those circumstances include:

- (a) the personal data is no longer necessary in relation to the purposes for which it was collected or processed.
- (b) you withdraw consent to consent-based processing.
- (c) the processing is for direct marketing purposes.
- (d) the personal data has been unlawfully processed.

There are certain general exclusions to the right of erasure. These general exclusions include where the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation or for the establishment, exercise, or defence of legal claims.

5.5 RIGHT TO RESTRICT PROCESSING

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- (a) where you contest the accuracy of the personal data or where the processing is unlawful, but you oppose erasure.
- (b) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise, or defence of legal claims.
- (c) where you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. We will, however, only otherwise process it with your consent.

5.6 RIGHT TO OBJECT TO PROCESSING

You have the right to object to our processing of your personal data on grounds relating to your situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- (a) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us.
- (b) the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise, or defence of legal claims.

5.7 RIGHT TO OBJECT TO DIRECT MARKETING

You have the right to object to our processing your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

5.8 RIGHT TO DATA PORTABILITY

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format. This right does not apply however, where it would adversely affect the rights and freedoms of others.

5.9 RIGHT TO COMPLAIN TO A SUPERVISORY AUTHORITY

If you consider that our processing of your personal data infringes current data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence or the place of the alleged infringement. In the UK the supervisory authority is the Information Commissioner's Office at <https://ico.org.uk>

5.10 RIGHT TO WITHDRAW CONSENT

To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing carried out before the withdrawal of consent.

5.11 PROVIDING US WITH WRITTEN NOTICE

You may exercise any of your rights in relation to your personal data by giving written notice to us at our postal address at Alpha International Training Ltd. Newport House, Newport Road, Stafford ST16 1DA.

6. THIRD PARTY WEBSITES

6.1 NO CONTROL OVER THIRD PARTY WEBSITES

Our website includes hyperlinks to and details of third-party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

7. PERSONAL DATA OF CHILDREN

7.1 AGE RANGE

Our website and services are targeted at persons over the age of 16 years. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

8. UPDATING INFORMATION

8.1 WHAT TO DO IF YOU WANT YOUR DATA UPDATED

If you wish to correct or update the personal information that we hold about you then you should let us know by email to support@alphatraining.uk or by post to our postal address.

9. COOKIES

9.1 WHAT A COOKIE IS

A cookie is a file containing an identifier i.e., a string of letters and numbers, that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 TYPES OF COOKIES

Cookies may be either “persistent” or “session” cookies. A persistent cookie will be stored by a web browser and will remain until a set expiry date, unless deleted by the user before the expiry date. A session cookie will expire at the end of the user session when the web browser is closed.

Cookies do not usually contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9.3 THE COOKIES WE USE

We use cookies for the following purposes:

(a) necessary cookies – we use these cookies to help make our website usable by enabling basic functions like page navigation and access to pages which require visitors to create an account and login.

(b) Preference Cookies – we do not use this type of cookie.

EXPIRY TYPE 1 Year HTTP Session HTTP

(c) Statistics Cookies – Statistics cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously:

EXPIRY TYPE 2 Years HTTP Session HTTP

Session HTTP

(d) security – we use cookies as an element of the security measures used to protect our website and services generally.

(e) Usage – We use cookies to help us to track what pages you visit on our website.

(f) marketing – we use third party vendors, including Google and Facebook, to serve ads to you based on your visits to our website. You can find their Privacy Policies in the following places:

Google: <https://www.google.com/policies/privacy>

Facebook: https://www.facebook.com/work/legal/Workplace_Standard_Privacy

(f) analysis – we use cookies to help us to analyse the use and performance of our website and services. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website

Google Analytics does not collect personally identifiable information and does not track your movements between different websites. The cookies used by Google Analytics are:
Google's privacy policy is available in the following place: <https://www.google.com/policies/privacy>

You may opt out of Google Analytics on all websites by going to the following place:

<https://tools.google.com/dlpage/gaoptout>

9.4 MANAGING COOKIES

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing this varies from browser to browser.

Blocking all cookies will have a negative impact on the usability of many websites. If you block cookies, you may not be able to use all the features on our website.

10. MARKETING

From time to time the College would like to send you information about our products and service, including information about our courses, INSET, and consultancy, and our professional development tools and opportunities.

We would like to do this via email, SMS, phone, post, Facebook, MailChimp and via our e-platform providers ECORDIA and THINKIFIC. The privacy policies for Facebook, ECORDIA and THINKIFIC can be found elsewhere in this Privacy Policy document. MailChimp's privacy policy is available in the following place:

<https://mailchimp.com/legal/privacy>

When we send marketing, emails promoting our products and services we employ a common software technology called beacons. These are tiny graphics with a unique identifier, similar in function to cookies, and are used to track if you have opened a marketing email. We use these in our HTML-based emails to let us know which emails have been opened by recipients. They allow the College to gauge the effectiveness of its communications and marketing campaigns.

If you would like to opt-out of these emails you can do so by clicking on the unsubscribe link in the footer of each email, we send you.

When we send marketing, emails promoting our products and services we personalise each link in each email with a unique code to enable us to track whether the recipient has clicked on the link in the email. This simply allows us to gauge the effectiveness of our communications and marketing campaigns.

Again, if you wish to opt-out of these communications then all you need to do is click on the unsubscribe link in the footer of each communication we send you.

11. OUR DETAILS

11.1 OUR WEBSITE

Our website address is www.alphatraining.uk

Our website is operated by: Red Box Web Design

Red Box Web Design privacy policy is available in the following place:

<https://redboxweb.co.uk/privacy-policy/>

11.2 OUR COMPANY REGISTRATION

Company Number – 15091222, Incorporated August 2023

11.3 OUR PLACE OF BUSINESS

Newport House, Newport Road, Stafford ST16 1DA

11.4 CONTACT METHODS

You can contact us:

(a) by post, at the address in paragraph 11.3 above.

(b) by telephone on +44 (0) 203 576 2363

(c) by email, on support@alphatraining.uk

11.5 DATA PROTECTION REGISTRATION

We are registered as a data controller with the UK Information Commissioner's Office under registration reference: ZB630026

IF YOU HAVE A QUESTION RELATING TO ANYTHING CONTAINED IN OUR PRIVACY POLICY THEN WE ARE HERE TO HELP – CALL US ON 0203 576 2363 OR EMAIL US AT enquiries@alphatraining.uk