

# Privacy Notice

## 1. Introduction

This privacy notice provides you with details of how we collect and process your personal.

By providing us with your data, you warrant to us that you are over 13 years of age.

**Iconis Learning and Development Limited** is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed a Data Protection Officer who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below.

### Contact Details

Our full details are:

Full name of legal entity: **Iconis Learning and Development Limited**

Email address: [compliance@iconislearning.com](mailto:compliance@iconislearning.com)

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [admin@iconislearning.com](mailto:admin@iconislearning.com)

## 2. What data do we collect about you, for what purpose and on what ground can we process it

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Participant/Learner Data** that includes data relating to any goods and/or services provided such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details. We process this data to supply the goods and/or services provided and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you / your employer and us and/or taking steps at your request to enter into such a contract.
- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable

publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

- **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

### **Sensitive Data**

As an ILM (Institute of Leadership & Management) Centre/Provider 005688 we may be required to request sensitive personal data from you as a Learner undertaking an ILM accredited programme, for the explicit purpose of sharing this with ILM, in exceptional circumstances, this may include information about your health for example where a reasonable adjustment is requested, or in the course of an investigation, complaint, or appeal. ILM assign a unique learner number to each learner at the point of learner enrolment which we also use in relation to your learning, assessment, and certification. In this instance, we would make you aware of the request and obtain your explicit consent before processing and sharing it.

Details are available in the ILM Privacy Policy, located at <https://www.i-l-m.com/privacy/learnerpersonaldata>

Iconis ILM Policies are available upon request.

### **3. How we collect your personal data**

We may collect data about you, by you or your employer providing the data directly (for example by filling in questionnaires or by sending us emails).

We may receive data from third parties such as analytics providers such as Google based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

### **4. Disclosure of your personal data**

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- Qualification and Evaluation bodies in order to fulfil our contractual obligations with you / your employer.

- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## 5. International Transfers

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## 6. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

## 7. Data Retention

We only retain your personal data for as long as is necessary to fulfil the purposes we collected it for. This includes, and is not limited to, the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information (including Contact, Identity, Financial and Transaction Data) for six years after they stop being clients.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 8. Your Legal Rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [compliance@iconislearning.com](mailto:compliance@iconislearning.com). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.