

PRIVACY POLICY

Captive Learning Limited (part of the Impact Futures Group) is committed to protecting and respecting the privacy of our visitors and clients when visiting our site or communicating electronically with us.

This Privacy Policy sets out the basis on which any personal data we collect from you or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 2008 (the "Act") the Data Controller is Captiva Learning Ltd, 4 Cam Road, London E15 2SN.

What personal data do we collect?

You may give us information about you by corresponding with us by phone, email or entering into a learning or employer activity with Captiva Learning Ltd. This includes information you provide when you use our website to apply for vacancies or register to receive information on Captiva Learning or one of its brands.

The information you share with us may include your name, address, email address and phone number, date of birth, marital status, personal description (including gender), geographical location, employment history, details regarding your right to work in the UK, salary information and training/achievements records.

Sensitive personal data - We may also collect, store and use special categories of more sensitive personal information, including race, ethnic origin, religion, sexual orientation and criminal convictions.

How do we use your personal data and what is the legal basis for such processing?

The personal data we collect is usually mandatory and, if such personal data is not provided, we may not be able to process your request. Where the process of collection of any personal data is not mandatory, we will inform you of this prior to collection.

We may contact you with information about our services, and those of the wider Impact Futures Group, that are similar to those that you have already received or enquired about, or we feel may be of interest to you.

If you provide us with your email address and / or phone number we may contact you by email, phone or SMS for these services. We may also use this information to send you content and recommendations based on your interests and on opportunities that may be of interest to you. Where we send such communications to you via e-mail or text, this will be because you have: (i) subscribed to receive marketing communications from us; or (ii) purchased our Services, and you have not opted out of receiving that marketing when you provide us with your email address and / or phone number. You have the ability to unsubscribe from marketing communications by following the unsubscribe link in the message.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

We will only collect, process and store your personal information to the extent that we are entitled to under law.

However, we will normally process your personal information only:

- Where we have your consent to do so
- Where the processing is necessary to perform our contract with you;
- Where the processing is in our legitimate interests and such interests are not overridden by your fundamental rights and freedoms; and
- Where we need to comply with a legal or regulatory obligation.

Examples:

Purpose of processing	Legal basis for processing
Processing a job application	Necessary for issuing a contract
Processing an employer and learner's engagement for apprenticeship provision	Necessary for government funding contractual compliance
Checking you are legally entitled to work in the UK	Legal obligation

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact our Data Protection Officer:

dataprotectionofficer@captivalearning.com

Right to Object to Processing

You may object to processing of your personal data where we rely on legitimate interest for processing that personal data. You also have the right to object where we are processing your personal data for direct marketing purposes. We will comply with your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

Sharing your Information

We may disclose your personal data to the following categories of recipient for the purposes described in this Privacy notice:

- Funding agencies for example: Department of Work & Pensions, ESFA
- Reference and DBS check supplier
- Occupational health providers

We may also disclose your personal data to any competent law enforcement body, regular government agency or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person.

Data Retention

We will not retain your personal data for longer than is necessary to fulfil the purposes for which we collected that personal information, unless the law permits or requires that we retain it for longer.

By submitting your personal data, you agree to this transfer, storing or processing. We will always take all reasonable precautions to make sure that your data remains secure and is handled in accordance with this Privacy Policy.

Data that is provided to us is stored on our secure servers. Details relating to any transactions to Captiva Learning will be encrypted to ensure its safety.

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk.

Captiva Learning will retain information for the following periods:

- Job applicant data – 6 months from the end of the recruitment campaign
- Employee data – During employment plus 7 years after leaving the company
- Learner Details – Governed by the government funding awarding body guidelines
- Employer Details – Governed by the government funding awarding body guidelines

Information Security

We comply with our information policy, we train our employees regarding our data privacy policies and procedures and permit authorised employees to access personal data on a need to know basis, as required for their role.

We ensure that our service providers we engage with to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

Access to Information

The Data Protection Act gives all individuals the right to access personal information that is held about them. You can request a copy of any information that we hold about you.

Please contact the Data Protection Officer at dataprotectionofficer@captivalearning.com if you wish to make such a request. We do occasionally update this Policy so please do return and review this Policy from time to time.

To access our candidate privacy policy, [click here](#).

We also comply with the ESFA ILR Privacy Notice when handling data about the learners who are on programme with us. You can find this Privacy Notice by [clicking here](#).

Cookies

The Captiva Learning website uses cookies. A cookie is a file containing an identifier (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.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. We use both session and persistent cookies on the Captiva Learning website.

We use cookies to distinguish you from other users of our website and remember specific information about you that enables us to provide you with a better user experience when re-visiting our website. Cookies do not typically 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.

By continuing to browse the site, you are agreeing to our use of cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Data Protection Registration

We are registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is ZA256926.

The website is owned and operated by Captiva Learning Ltd.

We are registered in England and Wales under registration number 10021355, and our registered office is at 4 Cam Road, Stratford, E15 2SN. 15.3 Our principal place of business is at 4 Cam Road, Stratford, E15 2SN.

Complaints or Queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact: dataprotectionofficer@captivalearning.com

You also have the right to raise concerns with Information ICO Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.