



# Data Protection & Privacy Policy

Appris ("Appris", "us", "we" or "our") is committed to respecting your privacy and to complying with applicable data protection and privacy laws. We have provided this policy to help you understand how we collect, use and protect your information when you visit our website and when you use our products and services.

You can visit our website without disclosing any personally identifiable information about yourself, although please note that we may use cookies and collect other non-personally identifiable information about your browsing activity. We collect IP addresses of visitors to our website; however, we never use this information to identify individuals; it is used solely to calculate the number of unique visitors.

If you do submit personal information in any form you can be assured that we will use your personal information only to support your continuing relationship with Appris.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we use your personal information.

## Who to contact about our Privacy Policy

Where any of your data is collected by Appris, we are the controller of this data. If we need to pass your data to another party for processing, for example, third party emailing systems, we will let you know that this is going to happen and you may withdraw consent at any time.

Appris can be contacted about this policy at our address BTAL House, Laisterdyke, Bradford BD4 8AT. You may also email [info@appris.co.uk](mailto:info@appris.co.uk).

## Personal Information Collection

We collect and use your personal information only with your knowledge and consent and typically when you contact us and subsequently use our services or request service information.

The type of personal information we may collect could include, for example, your name and postal address, the organisation you work for, telephone number, email address, gender and photographs of you at our events/activities. If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you.

Please see the table at the end of this policy for a full record of the types of personal information we collect, use and store.

## Non-personal Identifying Information

We may also collect non-personally identifying information about your visit to our website based on your browsing activities. This information may include the pages you browse and services viewed. This helps us to better manage and develop our sites, to provide you with a more enjoyable, customised service and experience in the future, and to help us develop and deliver better services tailored to your individual interests and needs.

From time to time, if you consented accordingly we may also store and use your information to contact you for market research and marketing purposes. We may contact you by email, phone or mail.

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## How will we use your information?

We may use your information for a number of purposes which includes: delivering any services, reports or information requested by you; responding to complaints or account enquiries. Please see the table at the end of this policy for a full record of the types of personal information we collect, use and store.

We may also undertake market and product analysis based on your use of our services and contact you with information about new developments, products, services and special offers.

If you have consented to receive details of our services, events and training you can contact us at any time to have your details removed from lists used by us for any or all of those purposes or from lists maintained by our admin team. To update your information or to otherwise tell us how you would like to receive information about our products and services - the choice is yours. To update your marketing preferences please email [info@appris.co.uk](mailto:info@appris.co.uk).

## When will we disclose your information to others?

Appris will only share your information with others where it is essential to the product or service that is being delivered. These could include awarding organisations, funding bodies, colleges or prospective employers. If we feel it would be beneficial to share your information with anyone else, we will seek your consent first.

Appris will not sell your information to third parties under any circumstances.

In the event that we undergo reorganisation or are sold to a third party, any personal information we hold about you may be transferred to that reorganised entity or third party for the purposes and subject to the terms of this Privacy Policy.

Appris may also be obliged to disclose your personal information to meet any legal or regulatory requirements (for example to comply with a court order) or obligations in accordance with applicable law.

## Social media, blogs, reviews

Any social media posts or comments you send to us (on Appris' Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook/Twitter/Instagram/LinkedIn) on which they are written and could be made public.

Other people, not us, control these platforms. We are not responsible for this kind of sharing. We recommend you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you wish.

Any blog, review or other posts or comments you make about us or our services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large. Any comments you make on these services and on social media in general must be not offensive, insulting or defamatory. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

## Apprenticeship applications

In submitting an apprenticeship application, you should be aware we may store the information you provide us for up to one year after the application deadline. We will store your information and any materials related to your application, such as interview notes, for a period of 12 months following your application. This is to enable

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us to provide feedback following the recruitment process and field enquiries about the process. We may contact you if other suitable vacancies arise using the information you have provided to us. You can change your mind and withdraw such consent at any time.

**How long do we keep your information for?**

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we need it for the purposes we acquired it for in the first place, or for additional purposes agreed with your consent. Please refer to the table at the end of this policy.

In most cases, this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards if you stop doing so. After that, we will delete it other than where we lawfully need to keep any data for audit or legal reasons. Please see a table that shows which data we store, why we store it and for how long at the end of this policy.

We shall keep data on our Management Information System (MIS) so that we may contact you about the services you have requested. At any point, you can request to be removed from this database.

**Access to your Information or Complaints**

You can write to us at any time to obtain details of the information we may hold about you. Please write to: [info@appris.co.uk](mailto:info@appris.co.uk).

You may request the following:

- Confirmation of whether, and where, we are processing your data
- Information about the purposes of the processing
- Information about the categories of recipients with whom the data may be shared
- Information about the period for which the data will be stored (or the criteria used to determine that period)
- Where the data was collected from the data subjected
- A copy of the personal information being processed

Many of the above points are addressed within this policy and in the appended table showing information by categories of contacts, however you may request them separately if you wish to enquire specifically about your information.

Please quote your name and organisation (where applicable) together with your telephone number and/or email address on any requests. We would be grateful if could clearly indicate what you would like to know or what information you want a copy of (this helps us to more readily locate your data.)

We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

We will respond to all enquiries/subject access requests within 30 days. This may be extended to 90 days in exceptional circumstances for highly complex requests. You have the right to make as many access requests as you would like. Should this arise, it will be discussed with you. You have the right to lodge a complaint with a supervisory authority. In the UK this is the Information Commissioners Office (ICO) and you can find out how to do this online here: <https://ico.org.uk/concerns/>

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## Information Security

Appris recognises that its customers are increasingly concerned about how companies protect personal information from misuse and abuse and about privacy in general. Appris is constantly reviewing and enhancing its technical, physical and managerial procedures and rules to protect your personal data from unauthorised access, accidental loss and/or destruction.

We use industry standard TLS certificates to provide encryption of data in transit, for example, access to Appris' website, internal systems and management portals are covered by HTTPS.

Please be aware that communications over the Internet, such as emails/webmail's, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. Appris cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Should we need to pass your information on to a third party, in order to deliver products and services, or for other purposes for which you have provided consent, we will ensure that the information is transferred securely and that the third party is aware of their obligations under our privacy policy. Third parties will be required to remove your information from their systems as soon as it is no longer needed for the purposes it was shared for.

## Data Storage and Security Systems

Appris stores all personal data securely on either cloud storage systems or its own internal storage systems. All our cloud storage is kept in EU based or EU GDPR compliant data centres which are managed with sophisticated high-level security systems. These storage services have their own data protection policies which we can provide you with on request. Our external IT Services choose storage providers with excellent security policies and systems to ensure minimal risk of data breaches and unauthorised access.

Our internal storage and communications systems are protected by high level, managed security systems, which are updated regularly. Our IT infrastructure is managed by external experts and is regularly reviewed to ensure security is constantly up to date.

## Hard Copy Documents and Destruction of Data

Appris only keeps information in hard copy where this is required, such as signed documentation (e.g. contracts, learning agreements), for funding bodies with hard copy evidence requirements or where there is a legal requirement to maintain original documents. All hard copy documentation containing personal data is stored in secure rooms or locked cabinets. Once hard copy documentation is no longer required, it is disposed of securely by shredding and incineration.

## Privacy Support

Appris reserves the right to amend or modify this policy at any time and in response to changes in applicable data protection and privacy legislation.

If we decide to change our policy, we will post the changes on our website so you know what information we collect and how we use it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will tell you. You will have a choice as to whether or not we are able to use your information in this different manner.

If you have any enquiries about Appris' privacy policy or practices, please write to [info@appris.co.uk](mailto:info@appris.co.uk). This

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mailbox is monitored by several employees of Appris. Our current Data Protection point of contact is Derek Pickard, who can be contacted directly at [d.pickard@appris.co.uk](mailto:d.pickard@appris.co.uk)

### **Monitoring and or recording of all your communications**

Monitoring of your calls, emails, text messages and other communications may take place in accordance with UK law, and in particular for business purposes, such as for quality control and training, to keep a record of contact between you and our organisation for effective delivery of products, services and contracts and to easily field enquiries, to prevent unauthorised use of Appris' website, to ensure effective systems operation and in order to prevent or detect crime.

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What personal information we collect, how long we store it for and why we collect this information (at a glance):

If you are a:	Legal basis for processing data:	Data we may collect with your consent:	How long we store/use this data:	Why we collect this information:	Third parties data may be shared with and why:
A business contact or stakeholder (e.g. a prospect or strategic contact)	Consent	<ul style="list-style-type: none"> <li>Full name</li> <li>Salutation</li> <li>Job Title</li> <li>Organisation you work for</li> <li>Email (business)</li> <li>Email (personal)</li> <li>Telephone number (business)</li> <li>Telephone number (personal)</li> <li>Organisation address</li> <li>Notes on our communications</li> <li>Contractual and legal documentation</li> </ul>	Three years (from last contact you've made with us)	<ul style="list-style-type: none"> <li>To follow up initial discussions on meeting you for the first time</li> <li>To contact you with information about our services</li> </ul>	<ul style="list-style-type: none"> <li>Cloud storage/ software providers; to store information</li> <li>Other business contacts; if requested by you (e.g. for networking introductions)</li> </ul>
Education contacts (school, college or university)	<ul style="list-style-type: none"> <li>Contract performance (delivery of agreed services)</li> <li>Consent (informing about services)</li> </ul>	<ul style="list-style-type: none"> <li>Full name</li> <li>Salutation</li> <li>Job Title</li> <li>Organisation you work for</li> <li>Email (business)</li> <li>Email (personal)</li> <li>Telephone number (business)</li> <li>Telephone number (personal)</li> <li>Organisation address</li> <li>Vehicle registration</li> <li>DBS Data (such as previous addresses)</li> <li>Notes on our communications</li> <li>Photographs at events</li> <li>Opinions from feedback forms</li> <li>Record of attendance at events</li> <li>Location of events you've attended</li> <li>Record of safeguarding disclosures</li> <li>Contractual and legal documentation</li> </ul>	Three years (from end of our contract with you or your employer)	<ul style="list-style-type: none"> <li>To safely deliver our contracts with apprentices.</li> <li>To ensure we meet appropriate safeguarding legislation when working with young people</li> <li>To analyse and report on your feedback (anonymously) from our events and activities to help improve services for you</li> </ul>	

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If you are a:	Legal basis for processing data:	Data we may collect with your consent:	How long we store/use this data:	Why we collect this information:	Third parties data may be shared with and why:
Apprentices	Contract performance (delivery of services)	Full name Address NI number Telephone number Date of birth Learning Difficulties Health Problems Age Year Group Gender Ethnicity Religion Photographs at events Opinions from feedback forms Records of attendance Record of safeguarding disclosures	In line with government contracting requirements	To safely deliver our contracts with any funders who have paid for the activities you've taken part in  To analyse and report on your feedback (anonymously) from our events and activities to help improve services for you	Cloud storage/ software providers; to store information Funding bodies; we may be contractually obligated to share your information with funders to evaluate their programmes – you will be informed if this is required
Funders (or their representatives)	Contract performance (delivery of services)	Full name Salutation Job Title Organisation you work for Email (business) Telephone number (business) Telephone number (personal) Organisation address Notes on our communications Contractual and legal documentation	In line with contractual arrangements	To safely deliver our contracts with you	Cloud storage/ software providers; to store information



# Data Protection & Privacy Policy

If you are a:	Legal basis for processing data:	Data we may collect with your consent:	How long we store/use this data:	Why we collect this information:	Third parties data may be shared with and why:
Suppliers	Contract performance	Full name address Salutation Job Title Organisation you work for Email (business) Email (personal) Telephone number (business) Telephone number (personal) Organisation address Notes on our communications Contractual and legal documentation	Three years from the end of the financial year containing the last transaction	To enable delivery of your services to us To contact you in regards to services received	Cloud storage/ software providers; to store information Other business contacts; if requested by you (e.g. for networking introductions) Funding bodies; we may be contractually obligated to share some of your information with funders
Apprentice applicants	Consent Legitimate interest	Full name Salutation Job Title Organisation you work for Email (business) Telephone number (business) Telephone number (personal) Organisation address Date of Birth Age Gender Home address Employment History Educational Attainment/Qualifications Unspent Criminal Convictions Photo ID (e.g. passport, driving licence) National Insurance Number	One year after application deadline	To be able to process your application. To contact you about any other job roles you may be interested in/suitable for	Cloud storage/ software providers; to store information

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		Reference Contact Details Notes on our communications			
Employees	Contract performance Legal obligation	Full name Salutation Job Title Organisation you work for Email (business) Email (personal) Telephone number (business) Telephone number (personal) Organisation address Vehicle registration DBS Data (such as previous addresses) Date of Birth Age Gender Home address Employment History Educational Attainment/Qualifications Unspent Criminal Convictions Photo ID (e.g. passport) National Insurance Number Reference Contact Details References Record of safeguarding disclosures Contractual and legal documentation Bank account details Next of Kin/Emergency Contact Details Photographs from events/activities Opinions from feedback forms/staff survey	Six years from the end of the tax year containing the last day of employment.	To safely deliver our contract of employment with you including payment of salary To safely deliver our contracts with funders, business or education partners or any other stakeholders To ensure we meet appropriate safeguarding legislation when working with young people To improve our staff experience To comply with our policies and procedures and employment legislation To be able to confirm details of your employment for example in response to a reference request	Cloud storage/ software providers; to store information Suppliers; to verify identity as employees of company, for outsourcing of payroll information, pensions, childcare voucher scheme, invoicing, employee benefit schemes Government departments; for pay, tax and pensions obligations Funders; details of contract delivery plans, expenses claims Potential clients and funders; details of proposed contract delivery plans