

# **Privacy Policy**



## Paragon Education & Skills Limited are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications, or share your data with anyone else who might. We do not sell your information to third parties.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

This version of our Privacy Statement was last update in July 2022.

#### What is the GDPR

The GDPR is a regulation intended to strengthen and unify data protection for everyone within the European Union (EU). The GDPR requires greater openness and transparency from companies on how they collect, store and use personal data, while also imposing tighter limits on the use of personal data.

#### How do we use this information?

We will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited 'junk' email or communications, or share your personal information with anyone else who might.



#### — More detail —

There are various ways in which we may use or process your personal information. We list these below:

#### Consent

Where you have provided your consent, we may use and process your information to:

Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don't worry, we won't bombard you);

To share your personal information with our recommended third party partners, so that they can contact you with information around apprenticeship opportunities.

You can withdraw your consent at any time by contacting us at enquiries@pgon.co.uk or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

### **Contractual performance**

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and enrolment to an apprenticeship or to find an apprentice.



## **Legitimate Interests**

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support apprentices, employers and other enquiries

To respond to correspondence you send to us and fulfil the requests you make to us (for example: vacancies and openings, graduates, open days);

To provide levy and funding support (for example help calculate allowances);

Processing necessary for us to respond to understanding apprentices' and employers' needs.

To analyse, evaluate and improve our products and services so that your visit and experience of our website, applications and services are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);

To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraph below;

For product development purposes (for example to improve delivery of learning);

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

## paragon skills

To send you marketing information from time to time after you have completed your apprenticeship or had an employee who has graduated.

We will only contact you with information about our own products and services (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time;

To contact you from time to time with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of a business or an online or public business directory. In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing;

To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information);

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

To verify the accuracy of information that we hold about you and create a better understanding of you as a customer;

For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;

To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);

To inform you of updates to our terms and conditions and policies.



## **Legal Obligation**

We may process your personal information to comply with our legal requirements (for example to register your apprenticeship application with the ESFA).

#### **Vital Interest**

Sometimes we will need to process your personal information to contact you if there is an urgent change to funding rules and we need to tell you about it.

## How long do we keep your information for?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.



#### — More detail —

We do not retain personal information in an identifiable format for longer than is necessary.

If we have a relationship with you (e.g. you are a learner registered on an apprenticeship programme), we hold your personal information for up to 9 years from the date your apprenticeship ends. We hold your personal information for this period to meet Education & Skills Funding Agency (EFSA) contractual requirements. If your programme is partially funded by the European Social Fund we will hold your personal information until we are instructed to destroy it by the ESFA in line with ESFA contractual requirements, this is expected to be around December 2030.

Where we have obtained your personal information following a request for information, enquiry or any other information on any of our services, we hold your personal information for 2 years from the date we collect that information, unless during that period we form a relationship with you e.g. you sign up to an apprenticeship. We hold your personal information for this period to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:

The law requires us to hold your personal information for a longer period, or delete it sooner;

Where you have raised a complaint or concern regarding a service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.