

Website Privacy Notice

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Version: 2.0

Introduction

Althaus Digital Limited ("Althaus", "we, "us", "our"), a company registered in England and Wales, registration number 06941675, of Charlotte House, Stanier Way, The Wyvern Business Park, Derby, England, DE21 6BF, is committed to protecting the privacy and security of the Personal Data we collect about website visitors and end customers ("you", "your").

The purpose of this privacy notice is to explain what Personal Data we collect about you when you visit our website or use our services. When we do this, we are the Controller of the Personal Data we process, registered in the UK with the Information Commissioner's Office ("ICO"), registration number ZA120763.

This privacy notice applies to apprenticeship candidates, learners, employers, business partners, suppliers and anyone interested in our services or who visit our website. Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice, you can contact us using the information provided below in the 'Contact us' section.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

Personal Data we collect

Althous is a digital skills training and development provider, with the aim of ensuring that candidates, learners and employers are equipped with the skills and resources to thrive in the digital economy.

We may collect the following categories of Personal Data for the provision of our services:

- Personal Data: name, email address, phone number, address, data of birth, National Insurance Number, gender, contact details, academic and professional qualifications (education and skills), training and employment history, information regarding future aspirations, training and attendance recording, username and password, call recordings and automated notes taken during online meetings, content of online chat, business name, business email address, banking information and any other information you provide to us.
- Special categories of Personal Data: ethnic origin and physical or mental health or condition.



- **Technical and usage information:** internet protocol (IP) address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- **Website information:** products and services searched and viewed, page response times, download errors, length of visits to certain pages, page interaction information (e.g., scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Where we collect it from

We receive information about you directly from you in person, via our website, text or email, and from third-party sources including:

- Employers;
- Education Authorities;
- Schools or other education establishments;
- Reputable companies who provide lead generation contact lists;
- Others to whom you have provided consent; and
- Publicly available sources.

Information about our use of Cookies

We use cookies on our website. Cookies are small text files that are downloaded to your device when you visit a website or receive certain emails, unless you have set your browser to reject them.

To learn more about cookies, please visit https://www.allaboutcookies.org/.

Purposes for which we use Personal Data and the legal bases

When providing services to you, we may use your Personal Data for the following purposes and on the following lawful bases:

Purpose	Lawful Basis for Processing
Responding to correspondence from you	It is in our legitimate interest to respond to enquiries made via our website, by email, through our social channels or any other means
Sending you information which may be of interest	If you are an existing customer or have expressed an interest in our products or services, we will rely on legitimate interests to contact you for marketing purposes. You may object to the processing for this purpose by emailing dataprotection@althausdigital.co.uk. If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any



Purpose	Lawful Basis for Processing
	time by emailing dataprotection@althausdigital.co.uk.
Provision of our services	Processing is necessary for performance of the contract between us
Maintaining accurate records of online meetings using automated note takers (AI)	We rely on your consent to use automated note takers during online meetings
Business management, forecasting and statistical purposes	It is our legitimate interest to identify areas for managing current business relationships, develop new products and services, and for managing our business
Improving our website and the overall website visitor and user experience	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our websites
Improving our websites and the overall website visitor and user experience	We use cookies on our websites with your consent, unless they are strictly necessary cookies, in which case your consent is not required

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Sharing your data

We may share your personal information with third-party service providers, for example, cloud storage providers, third-party processors etc. Third-party service providers will process your information on behalf of Althaus for the purposes stated above. When we share your data with these parties, we ensure appropriate safeguards are in place to protect your information.

Due to the nature of our business and the services we provide to our clients, Althaus may need to transfer your Personal Data outside the UK or European Economic Area (the EU member states plus Norway, Iceland and Liechtenstein – "EEA"). Such transfers of Personal Data will be safeguarded using the UK ICO-approved International Data Transfer Agreement ("IDTA") or the EU Standard Contractual Clauses ("SCCs") with UK Addendum with supplementary measures. This applies to service providers and third parties in countries outside the UK and EEA who are not subject to an adequacy decision,



adequacy regulation or other approved international data transfer mechanism. If you wish to know more about these safeguards, please contact us through the details below.

Althaus will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform with the law or comply with legal process served on Althaus; (b) protect and defend the rights or property of Althaus and this site; and, (c) protect the personal safety of users of Althaus, its website, platforms or the public.

How long we keep your data

We will retain your Personal Data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your Personal Data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning. Retention periods are detailed within our Personal Data Retention Policy. This information is available upon request.

How we protect your data

We implement appropriate technical and organisational measures to protect data against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include internal policies, training, using cryptography where appropriate and implementing least privilege access control.

Your data protection rights

There are certain fundamental rights that you have in respect of your Personal Data:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and
	use of their Personal Data
Right of access	Individuals have the right to receive a copy of their Personal Data,
	and other supplementary information
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified
	or completed if it is incomplete
Right to erasure	Individuals have the right to request their personal information to
	be erased, in certain circumstances
Right to restrict processing	Individuals have the right to request the restriction or suppression
	of their Personal Data, in certain circumstances, in particular:
	if your data is not accurate;
	if your data has been used unlawfully but you do not want us
	to delete it;



Rights	Description
	 if your data is no longer needed, but you want us to keep it for use in legal claims; or if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request
Right to data portability	Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances
Right to object	Individuals have the right to object to the processing of their Personal Data, in certain circumstances
	Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way
	Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time
Right to lodge a complaint with the ICO	You have the right to raise a complaint about how we handle your personal information with ICO

Exercising your data protection rights

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the details below:

Althaus Digital Limited

Charlotte House



Stanier Way
The Wyvern Business Park
Derby
England
DE21 6BF

Alternatively, you can email us at dataprotection@althausdigital.co.uk.

Raising a complaint with the ICO

If you believe that you have exhausted all possible avenues of resolving your data protection concerns with us, you may lodge a complaint with the ICO by calling their Helpline on 0303 123 1113.

You can also send your postal correspondence to:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Alternatively, you can contact them at https://ico.org.uk/make-a-complaint/.

Data Protection Officer

We do not have a statutory requirement to appoint a Data Protection Officer ("DPO") under the UK GDPR. However, for accountability and compliance purposes, we have voluntarily appointed Evalian Limited, a company specialising in data protection, cyber security and information security, as our DPO. Evalian Limited can be reached at dpo@evalian.co.uk.