

# Interactive Pro Limited Privacy Policy

Interactive Pro Limited takes the protection of your personal data very seriously and are committed to protecting and respecting your privacy.

When processing your Personal Data, Interactive Pro Limited is obliged to fulfil individuals' reasonable expectations of privacy by complying with the General Data Protection Regulation (the GDPR), the Data Protection Act 2018 (DPA), and other relevant legislation and regulations (collectively "Data Protection Law").

## **Purpose of this Notice**

This privacy policy sets out the basis on which any personal data we collect from you, or that you or any third parties provide, will be processed by us. We may withdraw or modify this notice at any time and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below:

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## **1. Who we are**

Interactive Pro Limited "also referred to in this notice as "we" or "us") is a data controller (which means we are responsible for deciding how we hold and use your personal information) of your data and is part of The Global University Systems B.V. group of companies which is made up of different legal entities, details of which can be found at <https://www.globaluniversitysystems.com>.

## **2. Data Protection Officer**

Interactive Pro Limited has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the following details:

### **Our contact details**

**Email address:** [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

**Postal address:** Data Protection Officer at, 30 Holborn, Buchanan House, London, EC1N 2HR.

Interactive Pro Limited maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation.

Interactive Pro Limited registration number is Z1429382 and sets out, in very general terms, the full range of purposes for which we use, students and all other personal information.

You have the right to make a complaint at any time 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 would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 3. What is personal data?

Personal data is any information about an individual from which that individual can be identified. Your name, address, phone number and bank account number are examples of personal data. It does not include data where the identity has been removed (anonymous data).

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a **contract** we have entered into with you.
- Where we need to comply with a **legal obligation**.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be less common:

- Where we need to protect your **vital interests** (or someone else's interests).

Generally we do not rely on **consent** as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by following the opt-out links on any marketing message or contact us using the contact details in this Privacy Policy.

### 5. The personal data we collect from you

#### Enquiries

When you request information or make enquiries about any of our services or programmes, we may use the personal data you provide in order to fulfil your request or respond to your enquiry. It is in our legitimate interests to use your personal data in this way so that you receive the information you have requested.

You may give us information about you by applying or enrolling on one of our courses, on our website completing a form, downloading a prospectus, by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

#### Applications

If you make an application to study on one of our partners programmes we may collect the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.

- Gender.
- Nationality and country of residence.
- Photo ID (e.g. your passport, driving licence or government ID)
- Visa information and immigration status.
- Education history.
- Employment history.
- Funding information.

It is in our legitimate interests to collect and use the above information in order to consider and process your application.

As part of our application process, we are obliged to ask for the following information on behalf of HESA (the Higher Education Statistics Agency), the official agency for the collection, analysis and dissemination of quantitative information about higher education in the UK. You can choose whether to provide this information to us or not.

- Gender
- Religion.
- Sexual orientation.
- Disabilities.
- Ethnic origin.
- Gender orientation.

## **Study**

If we enter into a contract with you relating to study, we may collect additional personal data relating to you including:

- Bank account details.
- Billing address.
- Credit card or other payment information in order to process your payments.

This information, together with the personal data provided to us above at application stage, will be used by us to perform the contract we have entered into with you.

We may also collect further personal data relating to your visa application and immigration status as we have a legal obligation to use this information.

During your studies we will collect information about your academic experience and progression. This is in order to fulfil our contract with you but it is also in our legitimate interests to use this personal data in order to monitor the provision of our service to you.

We may also collect personal data about your health in order to make appropriate arrangements and reasonable adjustments for you regarding your welfare or participation in your studies. We use this information in order to perform our contract with you but it also may be in your vital interests for us to do so.

If you use an agent to arrange your application and study with us, we may collect the categories of personal data described above from your agent.

## **Marketing**

Where you have explicitly consented to do so, we may use your personal data to inform you of special offers and new or existing services or courses we offer that are similar to those that you have already purchased or enquired about. This may also include surveys or questionnaires so that we can learn more about your needs and interests.

From time to time we may use your personal data to offer you the opportunity to participate in contests, sweepstakes and other promotions. When you enter you should carefully review any rules, as they may contain additional information about our use of your personal data.

If you would prefer that we do not send such communications to you, please follow the opt-out links on any marketing message or contact us using the contact details in this Privacy Policy. Please also see the section entitled “Your rights as a data subject” in this Privacy Policy.

### **Automated technologies or interactions**

As you interact with our website or learning platform, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

### **Our website and learning platform**

With regard to each of your visits to our website and learning platform we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time);
- pages you viewed or searched for;
- page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

### **We will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you and assist you in participating in interactive features of our service and track your progress on one of our courses;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

### **Internal business purposes**

We also may use your personal data for our internal business purposes. This is in our legitimate interests in order to operate as a business and monitor and improve the services we provide. Where possible we will anonymise this information. Please contact us using the contact details in this Privacy Policy if you would like more information.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## Parents and guardians

We collect personal data as described above. However if you are under 16 years of age and want to request information, download a prospectus, apply or enrol on one of our courses or contact us, you must ask your parent or guardian for permission. Our courses are not available to anyone under the age of 18.

## 6. When and how we share your personal data with others

We may share your personal data with third parties where required by law, where it is necessary to perform our contract with you or where we have a legitimate interest in doing so. Such third parties may include the following:

- **Our service providers:** We may share your personal data with other companies that perform certain services on our behalf. These services may include processing payments, providing customer service and marketing assistance, performing business and sales analysis, advertising, analytics, search information services, credit reference services and supporting our website and IT functionality. These service providers may be supplied with or have access to your personal data solely for the purpose of providing these services to us or on our behalf. Interactive Pro Limited is the data controller and will remain accountable for your personal data.
- **Our business partners:** We may share your personal data with our university partners or with your sponsor with whom we have a contract relating to your programme of study.
- **Agents:** If you use an agent to arrange your application or study with us, we may share your personal data with them.
- **Other entities in the GUS group:** We may share your personal data with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise or for system maintenance support and hosting of data.
- **Regulators:** We may need to share your personal data if required by a regulator or to otherwise comply with law.
- **HESA:** We collect information for the Higher Education Statistics Agency Limited (HESA). Further information on this can be found here. <https://www.hesa.ac.uk/about/website/privacy>
- **Others:** We may share your personal information with other third parties such as in the context of the possible sale of our business. We may also need to share your personal data in order to permit us to pursue available remedies or limit damages we may sustain.

## 7. Transfer of your personal data to other countries

As we are part of an international business with employees, entities and service providers all over the world, we may need to transfer the personal data you provide to us to other countries which may be outside the European Economic Area (EEA).

The data protection laws in such countries may not be as comprehensive and provide the same level of protection for your personal data as those within the EEA. In these circumstances, we will take appropriate steps to ensure that your personal data is handled as described in this Privacy Policy. These steps include putting in place appropriate contractual mechanisms. Please contact us using the contact details in this Privacy Notice if you would like more information.

## 8. The security of your personal data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, service providers, business partners, agents and other third parties who have a legitimate need to know. They will only process your

personal information on our instructions or as otherwise agreed and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 9. Our storage and retention of your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Please contact us using the contact details in this Privacy Policy if you would like more information.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 10. Your rights as a data subject

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing using the contact details in this Privacy Policy.

### No fee usually required

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.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Your right to withdraw consent**

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the contact details in this Privacy Policy. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **11. Changes to this Privacy Policy**

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This Policy was last updated on 20<sup>th</sup> September 2019

Due for Review by: 14<sup>th</sup> September 2020

## **Website visitor – Privacy Notice**

### **Types of personal information we collect**

We collect, use and store different types of personal information about you, which we have grouped together as follows:

<b>Types of personal information</b>	<b>Description</b>
Publicly Available Data	Details about you that are publicly available, such as on Companies House or elsewhere on the internet
Marketing Data	Details about your preferences in receiving marketing communications from us and our third parties
Consents Data	Any permissions, consents or preferences that you give us
Usage Data	Information about how you use our website, products and services

### **How we use your information**

#### **Cookies**

Our website <https://www.interactivepro.org.uk/cookie-policy/>. For more information on our cookies use, please read our cookies statement on our website.

#### **Generally**

The table below outlines how we use your personal information and our reasons. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>To provide you with information you may ask for</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To fulfil enquires you might make of us</li> </ul>
<ul style="list-style-type: none"> <li>To allow you to register for updates or for notifications of blog posts on our website</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To provide you with information that you may request from us</li> </ul>
<ul style="list-style-type: none"> <li>To allow you to register for events that we may be hosting</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To hold events, such as seminars, webinars, open days or corporate hospitality to promote our business and its services</li> </ul>
<ul style="list-style-type: none"> <li>To allow you to register as a member of our alumni network</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To operate and develop our alumni network and the activities of our alumni programme</li> </ul>
<ul style="list-style-type: none"> <li>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To provide efficient client care and services</li> <li>To ensure that our technology operates efficiently and without error</li> <li>To assess which of our services may be of interest to you and to tell you about them</li> <li>To develop new products and services and improve existing ones</li> </ul>
<ul style="list-style-type: none"> <li>To manage our relationship with you which will include notifying you about changes to our privacy notice and our website terms and conditions</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Contract performance</li> </ul>	<ul style="list-style-type: none"> <li>To provide efficient client care and services</li> <li>To keep you updated about changes in the legal terms that apply to the use of our website</li> </ul>



What we use your information for	Our reasons	Our legitimate interests
		<ul style="list-style-type: none"> <li>For record keeping and firm management</li> </ul>
<ul style="list-style-type: none"> <li>To manage the systems that contain our marketing database</li> <li>To manage marketing preferences and keep our records up to date</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>For data management for marketing and business development purposes</li> <li>To improve our systems and services</li> <li>To seek feedback</li> <li>To seek your consent when we need it to contact you</li> </ul>
<ul style="list-style-type: none"> <li>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Consent</li> </ul>	<ul style="list-style-type: none"> <li>To improve our marketing strategy and the services that we provide</li> </ul>

### Where we collect your personal information from

We may collect personal information about you from the following sources:

- Directly from you
- Cookies – see our cookie statement which can be accessed from our website
- Analytics providers, such as Google Analytics

### Who we share your information with

We may share your personal information with the following third parties:

- Our agents and service providers who we use to help us with marketing.
- Event organisers (if we are organising an external event which you are attending)
- The police and other law enforcement agencies
- Relevant regulators, including the Information Commissioner's Office in the event of a personal data breach
- Other companies owned or jointly owned by Global University Systems
- Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business.

### How long we keep your personal information

Where we use your personal information for marketing purposes we will retain your personal information for so long as we have your consent to do so (where we use your personal information with your consent in order to send you marketing messages) or, in other cases, for so long as we have a legitimate business or commercial reason to do so (unless you ask us to stop).

Where you withdraw your consent to receiving marketing materials or otherwise ask us to stop marketing we will add your details to a suppression list which ensures that we remember not to contact you again.

For further information as to how to withdraw your consent or to ask us to stop other marketing activities see ***Withdrawing consent using your information*** and ***Objecting to how we may use your information***.

If you withdraw your consent to receiving marketing materials or ask us to stop our marketing activities, we will still communicate with you for other purposes in the normal course of any other relationship we may have with you.

### **International transfers**

As a global company, we hold some personal information concerning our suppliers and their affairs within the United Kingdom. We do work with agents and service providers who may process your personal information on our behalf outside the EEA. If your information is processed outside the EEA, we will ensure that it is protected to the same standards as if it were being processed within the EEA by putting in place a contract with our agents and service providers that provides adequate safeguards or using service providers that are certified on the US Privacy Shield framework.

If you require more information or have any queries, please contact our Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

# **Applicants and Students Privacy Notice**

## **Purpose of this Notice**

InterActive Pro Limited ("we", "our", "us") are committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which any personal data we collect from you, or that you or any third parties provide, will be processed by us. We may withdraw or modify this notice at any time and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information.

**"Personal data"** refers to information relating to a living, identifiable individual. It can also include **"special categories of data"**, which is information about your racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

**"Processing"** means any operation which we carry out on your personal data e.g. obtaining, storing, transferring and deleting.

## **2. Your personal information**

We hold a range of personal data about you, some of which you provide to us direct and some of which we receive from third parties, such as UCAS, where relevant. **See below for further details of personal data we receive from third parties.** Examples of categories of personal data which we hold are: your contact details, prior educational experience/attainment, immigration information (e.g. passport details, language proficiency), where relevant, health information (including any disabilities) and other equality-monitoring data you provide to us. In addition, if you come to study with us, we process data about your academic performance, attendance and progression, and where relevant, breaches of our policies (e.g. academic or other misconduct concerning InterActive Pro Limited -related activities). We also process contact and educational details after you have completed your programme or your activities with us are otherwise terminated.

## **The purposes for which we process your personal data and the legal basis**

When you are an applicant, we process your personal data for the purposes of assessing your eligibility to be offered a place on one of our academic or professional programmes.

If you take up a place at InterActive Pro Limited, we process your personal data for the purposes of providing our academic or professional programmes and related services.

If you are unsuccessful or do not take up a place at InterActive Pro Limited, we will retain your personal data in line with our retention schedules for statistical and audit purposes or in the event of a complaint or an appeal.

We only process data for specified purposes and if it is justified in accordance with data protection law. The table below lists the various purposes for which we process personal data and the corresponding justification for it. Some processing of your personal data is justified on the basis of contractual necessity. In general, this applies to personal data you provide to us to process your application and if enrolled, to monitor academic performance. Without that information, we would be unable to provide you with your chosen academic programme and related support services. Some personal data is also required to fulfil our legal obligations regarding immigration. A failure to provide that information would prejudice your application for a Tier 4 visa.

No	Purpose	Legal basis/ justification
1	Assessing eligibility to undertake our academic or professional programmes.	Processing is necessary for the purposes of taking steps prior to entering into a contract with us
2	Supporting applicants through the application process and providing further information on the services we can offer	Necessary for negotiating to enter into a contract and legitimate interests in providing support to applicants
3	Provision of academic programmes and related services (including IT and library services).	Necessary for performing a contract, i.e. to provide your chosen academic programme. This can be a contract with us or a contract between you and your home institution ("contractual necessity")
4	Identifying students and assisting them in trying to succeed in their learning via the dashboard system.	Contractual necessity and legitimate interest in assisting our students to succeed in their studies
5	Assessment of academic progress and performance (including attendance), and where necessary providing support	Contractual necessity
6	Financial Administration (including provision of	Contractual necessity

No	Purpose	Legal basis/ justification
	loans/ bursaries)	
7	Administration of extenuating circumstances procedures.	Contractual necessity
8	Administration of complaints, academic appeals, interruption and withdrawal, fitness to study procedures.	Contractual necessity
9	Immigration matters.	Necessary for us to comply with our legal obligations in relation to students who hold Tier 4 visas. Such processing may also be in the public interest.
10	<p>Making reasonable adjustments for disabilities and providing relevant support to students with ill health and providing wellbeing support.</p> <p>This includes processing special category information.</p>	Explicit consent.
11	Employability Support	Contractual necessity and our legitimate interest in assisting our students and alumni to progress in their careers.
12	Regulating InterActive Pro Limited's community (including dealing with misconduct under our procedures for academic and other misconduct including disciplinary procedures)	Contractual necessity and our legitimate interest in maintaining academic standards and the good order of InterActive Pro Limited community.
13	Obtaining payment of fees.	Contractual necessity and our legitimate interest in obtaining payment for the services we provide.

No	Purpose	Legal basis/ justification
14	Protecting our property and assets (e.g. by dealing with misconduct)	Necessary for our legitimate interest in safeguarding our property and assets.
15	Providing appropriate I.T. and other infrastructure facilities e.g. a virtual learning environment	Contractual necessity; legitimate interest in providing a proper infrastructure to support the provision of academic or professional programmes and related student services.
16	Communicating with students	Contractual necessity and our legitimate interest in marketing InterActive Pro Limited and promoting student welfare
17	Registering alumni to maintain an alumni network	Necessary for our legitimate interests in maintaining an alumni network, and marketing

There may be other processing in addition to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

Where the basis of processing your personal data is contractual necessity and you fail to provide the personal data in question, InterActive Pro Limited may not be able to process your application or provide you with the programme for which you have applied. A failure to provide immigration-related data may result in failure to obtain a Tier 4 visa for those who students who require it.

#### **Personal data received from third parties**

No	Data	Source
1	Contact details and attainment.	UCAS and call agents
2	Your immigration status.	Home Office (UKVI)
3	Transcripts - details of programmes undertaken or being undertaken at another institution; attainment.	Another institution and/or secondary/high schools.
4	Medical, mental health, accessibility-related and similar information. This is special category personal data. We only obtain this information from third parties if you give us consent to do	Another institution, medical practitioners and/or family members

No	Data	Source
	so or if it's a matter of life and death.	
5	Your financial status.	Student Loans Company.
6	Details of any InterActive Pro Limited-associated complaint	Office of the Independent Adjudicator, and/or Competition and Markets Authority
7	Information required to assess eligibility for courses i.e. from employers or sponsors.	Employers or sponsors.
8	Details as to how you are performing in your apprenticeship job.	Your employer if you are an apprentice
9	Details as to how you are performing on placement.	Your placement provider
10	Details of performance at a partner institution including attendance and disciplinary issues.	Our collaboration partner.

### Recipients of personal data

On occasion we may need to share your data with third parties. The following table lists what information we may share with whom

No	Recipients	Data which we may share with them
1	Companies within the group	Contact details, Course information where students and graduates are interested in entrepreneurship activities and relevant employability activities
2	Placement providers	Your CV as well as any accessibility and assistance requirements and related information.
3	Co-curricular and/or extracurricular excursion providers	Accessibility and assistance requirements and related information.

No	Recipients	Data which we may share with them
4	Your employer if you are an apprentice.	Details as to how you are performing in the academic part of your apprenticeship.
5	Your employer or sponsor if you are a sponsored student.	Details as to how you are performing and attendance in your course.
6	External examiners.	Identification details and exam papers.
7	Turnitin.	Identification details and assessment papers in order to detect plagiarism
8	Education and Skills Funding Agency if you are an apprentice.	Student details including course and employer information and academic progression.
9	End point assessor if you are an apprentice	Identification details and assessment details.
10	UK Home Office	Passport details; contact details; programme details including attendance, placement details and work experience; fees and housing details
11	Data processors i.e. third parties who process personal data on our behalf e.g. software providers	Application details; attendance records
12	Local Authority (including the electorate office).	Contact details and course details where there's a legal basis.
13	Student Loans Company.	Contact details and course details including progression.
14	InterActive Pro Limited's insurers and internal and external auditors, Health and Safety Executive in respect of accidents or incidents connected with	Student details and details in relation to any incident.

No	Recipients	Data which we may share with them
	the company.	
15	Regulatory bodies, where you are on a professional programme	Contact details, attendance and progression information and potentially disciplinary or fitness to study or fitness to practice issues
16	Government agencies i.e. HMRC*	Contact details and potentially other information if requested where there is a legal basis.
17	Police*.	Contact details and potentially other information if requested where there is a legal basis.
18	London Borough of Holborn or other members of the Channel Panel, a programme which provides support to individuals who are at risk of being drawn into terrorism as defined in Part 5, Chapter 2 of the Counter Terrorism and Security Act 2015.	Contact details and other information that InterActive Pro Limited could be required to supply in order to comply with the Counter Terrorism and Security Act 2015.
19	Potential employers or other companies requesting a reference or confirmation of qualifications	Attendance, progression and performance details including disciplinary or academic misconduct issues or breaches of the InterActive Pro Limited's regulations.
20	Close family, next of kin and emergency services where there is an emergency situation such as illness or serious injury	Personal data including potentially special category data if necessary
21	Other UK based and international educational institutions which the InterActive Pro Limited partners or collaborates with to deliver placements,	Contact details, attendance, progression and performance details and details of any disciplinary or academic misconduct issues or breaches of InterActive Pro Limited's regulations



No	Recipients	Data which we may share with them
	study abroad programmes, dual awards, franchised or validated awards or any articulation or progression agreement.	
22	Higher Education Statistics Agency (“HESA”); Office for Students and Government Departments such as the Department for Education for analysis of student data or to carry out statutory functions	<p>Personal details, progression and performance details, details of the Destination of Leavers’ Survey.</p> <p>The privacy notice for the Office for Students including sensitive data that they may hold, can be found here <a href="https://www.officeforstudents.org.uk/privacy/">https://www.officeforstudents.org.uk/privacy/</a>.</p> <p>The privacy notice for HESA can be found here <a href="https://www.hesa.ac.uk/about/website/privacy">https://www.hesa.ac.uk/about/website/privacy</a></p>
23	External debt collection agencies, in relation to student debts where InterActive Pro Limited’s own recovery attempts have proven unsuccessful	Contact details and details of debt

*\* This will only be shared on request and where there is a legal basis for doing so.*

### **Overseas transfers of personal data (i.e. outside the European Economic Area (EEA))**

Where possible, we aim to hold personal data relating to students within the EEA. Where any of your personal data is transferred outside the EEA it will be subject to a legally binding data sharing agreement and to an adequacy decision by the European Commission (country, territory or specified sectors), or other appropriate safeguards as set out in Article 46 of the GDPR.

### **Retention of data**

The length of time that we keep your personal data for is set out in the Student Records Retention Schedule, please contact [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) for more information.

### **Your rights as a data subject**

As a data subject, you have the following rights in relation to your personal data processed by us:

- To gain access to your personal data;
- To rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;
- To have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;

- To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.
- To restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period.
- To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.
- To not have decisions with legal or similar effects made solely using automated processing, unless certain exceptions apply.

Where we are relying on your consent to process your data, you may withdraw your consent at any time. Your requests will be considered at the latest within one month.

### **Exercising your rights, queries and complaints**

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer at:

[dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

### **Complaints to the Information Commissioner**

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

## **Graduation Privacy Policy**

Interactive Pro Limited graduation ceremonies are significant events for our graduates, their guests and our staff. These ceremonies are public events and therefore there is no expectation of privacy under data protection legislation for any attendees. This statement explains how personal data will be processed for and during the event and provides guidance should you not wish your personal data to be processed in this way. This applies to all students who are intending to graduate or may be eligible for an award, whether they attend a ceremony or not. Please note the following important information and ensure your invited guests are also aware of the information relevant to them:

- Your name will appear in the Graduation brochure. If you do not want your name included for these purposes you must tell us by emailing [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) no later than 5 weeks prior to the date of your ceremony\*.
- If you graduate in person your name and award title will be read out at the ceremony immediately prior to you walking across the stage.
- Your photograph will be taken whilst you cross the stage and receive your 'parchment'.
- Crowd shots will be taken by Interactive Pro Limited photographers at the venue and at our graduation receptions and these may include images of you and your guests.
- Your consent will be sought for smaller group or individual photographs prior to these being taken. If you do not wish to be photographed, you should tell the photographer before the photo is taken.
- Live film feed may be used to stream the ceremonies externally.
- If you do not wish to have your photograph taken/ video filmed/streamed when crossing the stage, including being handed your parchment you must tell us by emailing [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) no later than 5 weeks before the date of your ceremony\*.
- Videos of the ceremonies may be produced and screened at relevant post-graduation receptions and, at a later date, will be made available for viewing from the Interactive

Pro's website.

- Television companies may be present to interview our honorary graduands and other VIPs or film the event generally. If you do not wish to appear on television, you should maintain your distance from any filming that may take place.
- Appropriate photographs and films of these events may be used to promote the activities of Interactive Pro and these may appear in any of our promotional materials, in printed or electronic format, including worldwide web sites, multimedia productions, course leaflets or prospectuses. Please note that websites can be seen worldwide.
- Visual images will be used and retained strictly in accordance with the UK Data Protection Legislation and the Interactive Pro's records retention schedules.

If you have any queries or concerns about the use of your personal data for/at our Graduation ceremonies, please email [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) no later than 5 weeks prior to the date of your ceremony. Please see the full privacy notice below:

*\*When emailing please ensure that you include your Student ID and Programme of Study.*

## Identity of controller

Interactive Pro Limited

Registration number: Z1429382

Address: Belmont House, Station Way.Crawley. West Sussex. RH10 1JA

## Purpose for collection/processing

Interactive Pro Limited processes personal data for the purposes of arranging graduation ceremonies, conferring awards on graduands and documenting the event for the purposes of celebrating graduands achievements and for the future promotion of Interactive Pro Limited.

## Legal basis

Article 6(1) of the General Data Protection Regulation refers:

Article 6(1) (a) consent, is the basis for including names in the press.

Art 6(1) (f), legitimate interests, is the basis for processing personal data for the purposes of photography and filming where this is for future promotion of Interactive Pro Limited. Please see the photography statement provided for further information. It is in the legitimate interests of the controller to use images of successful graduates and ceremonies for future promotion of Interactive Pro Limited. To balance the individual's interests, rights and freedom Interactive Pro Limited provides a fact sheet of all photography and filming activities to individuals prior to the event which details how they can avoid inclusion in the photography and filming and exercise their rights in the event that they are included. It is in the interests of both Interactive Pro Limited and individual graduands involved to document these auspicious occasions which are important life events to be celebrated.

## Whose information is being collected/processed

Students, Interactive Pro Limited employees and all other ceremony attendees, including those invited by students/graduands.

## What information is being collected

Name, identifying numbers, contact details, educational details, photographs and moving images.

## How is the information collected

Interactive Pro Limited systems for the event organisation and images by camera on the day of the event.

## Who is the information shared with outside Interactive Pro Limited

Publicly – the publication of names in graduation brochures, photographs online and in any of Interactive Pro Limited's promotional materials, in printed or electronic format.

## How is the information kept securely

Information/photographs are kept securely on Interactive Pro Limited's processing equipment in line with the Interactive Pro Limited's information security and data protection policies.

## How is the information kept up to date

Students are required to keep their information up to date during the course of their studies to

ensure that the personal data used at the time of graduation ceremonies is accurate, as this will be recorded at this point as a record of the event.

### How long is the information kept

Please see Interactive Pro Limited's Records Retention Schedules.

### Will the information be used for any automated decision making

No

### Is the information transferred outside the European Union?

Ceremony live video streams are broadcast over the internet and may be accessed out with the EU.

Individual photographs and graduation brochures may be transferred outside the EU by third party individuals.

### Your rights

Attendance at a Graduation Ceremony is optional and students can choose to graduate in-absentia (without attending). This selection is made at the time of registering a student's intent to graduate.

Graduands can request that they are not photographed/captured on video while crossing the stage during the ceremony.

This request must be made in writing to [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) and submitted no later than 5 weeks prior the date of the ceremony.

Graduands can request that their name does not appear on the official Graduation Brochure.

This request must be made in writing to [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) and submitted no later than 5 weeks prior the date of the ceremony

### Data protection officer

Enquiries relating to data protection should be made to Interactive Pro Limited Data Protection Officer, email: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

### Further information

<https://www.interactivepro.org.uk/privacy-policy>

## **Alumni and Supporters – Privacy Notice**

### **Purpose of this Privacy Notice:**

Our alumni and supporters are extremely important to us. This Privacy Notice explains how we, InterActive Pro Limited, use the personal data our Alumni and Development Department collects from our alumni and supporters.

We are the data controller for personal data relating to you and this Privacy Notice explains how we will process your personal data. This Privacy Notice will be kept under review and any changes will be updated on our website and communicated to you as appropriate.

This Privacy Notice was last updated in June 2019.

### **Who does this privacy notice cover?**

This privacy notice covers InterActive Pro alumni who have completed a course of over 12 months' duration. It also covers individuals who have chosen to support InterActive Pro in some way that is under the remit of the Alumni and Development Department and have consented to be contacted for one of the purposes set out below. This notice only covers processing of personal data for Alumni and Development purposes as set out below. For other personal data processing related to former-students and alumni see the Student Privacy Notice.

### **What personal information do we collect?**

We may hold a range of personal data about you from a number of sources.

The majority of the personal data that we hold is information provided to us by you. If you are an alumna/ alumnus of InterActive Pro, personal data collected during your time as a student is transferred from your student record such as your name, date of birth and gender to InterActive Pro's alumni database when you complete a course of over 12 months' duration. We may also add information provided by you during interactions with you. If you are a supporter of InterActive Pro, the personal data we hold may be information provided by you during your interaction with us.

Examples of categories of personal data which we may hold are:

- Personal identifiers – e.g. your name, gender, student/ alumni numbers and your date of birth;
- Contact details – e.g. your postal/ email address, telephone number and contact preferences;
- Information about your time at InterActive Pro – e.g. the courses you completed and your membership of clubs and societies;  
Career details – e.g. job role;
- Records of donations – including financial details and Gift Aid status, where applicable (as required by HMRC);

- Communications between the Alumni and Development Department and you;
- Information about your interactions with InterActive Pro – e.g. records relating to volunteering activities on behalf of the College, online interactions with us on social media, information about your use of College resources or facilities (e.g. the library), information on your engagement with College meetings, events, groups or networks;
- Results of automated decision making and profiling processes to focus our interactions with you

We may also hold information collected from publically available sources, such as social network posts, internet searches and websites, and may augment this information with the personal data you provide to us.

### **Why are we collecting your personal data/what are we doing with it (purposes)?**

We only process data for specified purposes and if it is justified in accordance with data-protection law. In general terms, we process your personal data for the purposes of increasing alumni involvement with the student experience at InterActive Pro, fundraising, alumni/ supporter communications and related activities by the Alumni and Development Department. More specifically, these activities may include:

- sending you publications (e.g. alumni magazines and email newsletters about InterActive Pro and fundraising activities);
- inviting you to alumni and supporter events, reunions and University events;
- informing you of benefits available to alumni and supporters;
- asking you to support InterActive Pro (e.g. contributing to student mentoring schemes or donations);
- fundraising programmes;
- wealth analysis and research in order to improve our understanding of our alumni and supporters, inform our fundraising strategy and target our communications; and
- internal record-keeping and administration (e.g. to process a donation or administer an event which you are attending).

There may be other processing in addition to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter. Use of our websites, including our use of cookies, is covered by our website privacy notice: <https://www.interactivepro.org.uk/privacy-policy>



### **Do we use any automated decision making or profiling?**

Automated individual decision-making means making a decision solely by automated means without any human involvement and profiling means the automated processing of personal data to evaluate certain things about an individual. We may use automated or manual analyses including segmentation or profiling to link data together to send you communications which are relevant and timely, to identify opportunities which may be of interest to you, to help us identify your potential for supporting InterActive Pro and to avoid approaching you with opportunities which are not of interest. We may carry out wealth screening to focus our conversations with you and ensure we provide you with an experience which is appropriate for you.

### **What legal bases do we rely on for processing your personal data?**

Depending on the activity being carried out, we will rely on one of the following conditions for processing: a legitimate interest; a legal obligation; or your consent to process your data, as explained below.

- *GDPR Article 6(1) (a) – Consent of the data subject*

Unless mentioned below, we will only process your personal data in relation to alumni and development purposes where we have your consent. This means we will only email you, or call TPS registered numbers, if we have your express consent to do so. We may contact you by post, unless you have asked us not to. We will also only contact you about College news, events or to ask for a donation if we have your express consent to do so.

- *GDPR Article 6 (1)(c) – Processing is necessary for compliance with a legal obligation*

If you make or have made a charitable donation we will process your name, address, and donation information under 6(1)(c) of the GDPR for the purpose of administering your donation and claiming Gift Aid on your behalf. We may also use available sources to carry out due diligence checks to meet money laundering regulations. If you withdraw consent, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future. The College has a legal obligation to supply some of the information we hold about you, as a graduate, to the Higher Education Statistics Agency (HESA) – the official agency for the collection, analysis and dissemination of quantitative information about higher education in the United Kingdom. HESA will treat your data in line with its collection notices.

HESA produces official statistics and its outputs are regulated by the UK Statistics Authority, which has a direct line of accountability to Parliament.

- *GDPR Article 6.1(f) -Processing is necessary for the pursuit of our legitimate interests*

Processing of student record data for alumni under legitimate interests for the purpose of monitoring our academic services and providing you with information (e.g. copy of transcript, confirmation of degree etc.) is covered in the Student Privacy Notice.

### **Who do we share your personal data with? What data do we share?**

On occasion we may need to share your data internally and with third parties. The following table lists what information we may share with whom.

<b>Recipients</b>	<b>Data which we may share with them</b>
Our staff in the Alumni and Development Department	Contact details, course information, and, where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent, health information.
Our administrative/ IT staff associated with alumni/ supporter activities	Contact details, course information, and, where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent, health information.
Volunteer partners associated with alumni/ supporter activities	Contact details and course information
College clubs and societies	Contact details and course information

Event providers	Registration details, accessibility and assistance requirements and related information including dietary requirements.
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Third parties engaged by InterActive Pro to provide alumni and fundraising related services including potential for wealth analysis and research or to carry out	Contact details and course information
automated or manual	

analysis to link data together to identify your potential for supporting InterActive Pro

Data processors i.e. third parties who process personal data on our behalf e.g. software providers, event booking providers etc. (e.g. Eventbrite)	Contact details and course information

**How are we protecting your personal data?**

Your personal data is held securely on InterActive Pro’s alumni and supporter database, which is accessible by a limited number of staff and is secured. Any transfer of your personal data outside the European Union will be subject to the Privacy Shield protections. Further information about Privacy Shield can be found at <https://www.privacyshield.gov/welcome>.

We ensure we have appropriate data sharing agreements in place before sharing your personal data.

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

InterActive Pro is committed to working in a transparent, ethical, responsible and honest way.

### **Your rights as a data subject**

As a data subject, you have the following rights in relation to your personal data processed by us:

- to gain access to your personal data;
- to rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;
- to have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
- to object to the processing of your personal data for marketing purposes;
- to object to the processing of your personal data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing;
- to restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period; and
- to ask for the transfer of your data electronically to a third party.

### **How long is your personal data kept?**

Personal data in support of your alumni relationship with InterActive Pro will be kept until there is no longer a legal basis for holding it, until you object to the processing of your data (e.g. for direct marketing purposes) or until you withdraw your consent.

If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future. We may also need to retain some financial records for statutory purposes.

### **How can you maintain your personal data?**

You can ask to update, amend or correct the data we hold about you by contacting by contacting the Alumni and Development Department by email at:

[dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) you can also change your communication preferences at any time to restrict how we process your data, or opt out of some or all

communication. We will also review your consent and preferences at least every two years.

### **Exercising your rights, queries and complaints**

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer:

Data Protection Officer

Address: 30 Holborn, Buchanan House, London, EC1N 2HR.

Email: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

### **Complaints to the Information Commissioner**

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

## **Recruitment Privacy Notice**

This notice applies to individuals applying to work with us, including prospective directors, employees, trainees, apprentices, work experience students, workers, consultants and contractors. It applies whether the work applied for is part time or full time; or permanent, temporary or for a fixed term.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information.

This notice explains how and why we will collect and use your personal information in the context of the recruitment process and your rights in relation to your personal information. We may amend this notice at any time.

### **2. Your personal information**

In this privacy notice, 'your personal information' means your personal data i.e. information about you from which you can be identified. Sections 5 and 6 below set out your personal information that we may process.

Your 'personal information' does not include data where the identity has been removed (anonymous data).

It is important that your personal information is accurate and up to date. Please inform us if your personal information changes during the recruitment process.

### **3. Special categories of personal information**

'Special categories of personal information' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or

alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

Data marked \* in the table at section 5 below, and data described at section 6, falls within these 'special categories' or might disclose special categories of personal information. We must have additional legal grounds for processing special categories of personal information, and these grounds are set out at sections 5 and 6 below.

#### **4. Where does your personal information come from?**

Your personal information will come from you or us, and may also come from the following sources:

- Recruitment agencies and apprenticeship providers may provide us with the following personal information: personal contact details, qualifications, schools attended, details of previous employment(s), skills and experience, hobbies and interests, and interview notes.
- Credit reference agencies may provide us with the following personal information: personal contact details, date of birth, details of credit accounts and usage and an overall credit score.
- Former employers or other referees, whom you have given us permission to contact, may provide us with the following personal information: role(s) held, dates of employment, details of skills and capabilities and any other information that helps to assess your suitability for the position applied for.
- InterActive Pro Limited staff may provide us with: personal information about you if they are referring you for recruitment.
- Medical professionals may provide us with the following personal information: information relating to any disability that you may have, the effects of that disability, and adjustments that may need to be made to the recruitment process as a result of that disability.
- Professional bodies such as the, Association of Chartered Certified Accountants, Law Society of England and Wales, and / or the Solicitors Regulation Authority may provide us with the following personal information: qualifications, registrations, practising certificates, accreditation details and membership details.
- Google and social networking accounts (such as LinkedIn): as part of the recruitment process we may source personal information relating to roles you have held, details of skills and capabilities and any other information that helps us to assess your suitability for the position applied for.
- Disclosure Scotland: as described at section 6 below.

Some of the sources above will only be relevant in certain circumstances, or if you have applied for a particular role. If you would like more information on the source of your personal information please contact the HR department.

#### **5. Processing your personal information**

We may process your personal information during and after the recruitment process. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

In general, we process your personal information for the reasons, and on the legal grounds set out in the following table, and also to:

- Retain records relating to the recruitment process;
- Establish, exercise or defend legal claims;
- Comply with the law or requirements of any regulator; and
- Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency).

Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
Contact you regarding the recruitment process and any offer of work	To enter a contract	Personal contact details (including name, address, email, telephone number)
Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work	To enter a contract For our legitimate interests: <ul style="list-style-type: none"> <li>• to select suitable employees, workers and contractors</li> </ul>	<ul style="list-style-type: none"> <li>• Information provided in your application form, CV, any covering letter or email, and interview notes</li> <li>• Information sourced from google and social networking accounts (such as LinkedIn) relating to roles you have held, details of skills and capabilities and other information that helps us to assess your suitability for the work.</li> </ul>
If you have accepted an offer of work from us that is subject to such checks: <ul style="list-style-type: none"> <li>• Take up references (from referees whom you have given us permission to contact);</li> <li>• Carry out credit checks; and / or</li> <li>• Confirm your professional</li> </ul>	To enter a contract For our legitimate interests: <ul style="list-style-type: none"> <li>• to select suitable employees, workers and contractors</li> </ul>	<ul style="list-style-type: none"> <li>• References and details of previous employers (including role(s) held, dates of previous employment, details of skills and capabilities and other information that helps to assess your suitability for the position applied for)</li> <li>• Results of credit check: personal contact details, date of birth, details of credit accounts and usage and credit score</li> <li>• Professional qualifications,</li> </ul>

Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
memberships, registrations and / or qualifications.		registrations, practising certificates, accreditation details, and membership details
Determine the terms of any potential contract between you and us	To enter a contract To comply with a legal obligation	Offer letter, and proposed contract between you and us
If you have accepted an offer of work, check you are legally entitled to work in the UK	To enter a contract To comply with a legal obligation	Documentation confirming your right to work in the UK
Consider reasonable adjustments to the recruitment process for disabled applicants	<p>To enter a contract To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> <li>• To select suitable employees, workers and contractors</li> </ul> <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> <li>• To exercise or perform employment law rights or obligations</li> </ul>	Information about a disability, the effects of that disability, and adjustments that may need to be made to the recruitment process as a result of that disability*



Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
Carry out equal opportunities monitoring.	<p>For our legitimate interests:</p> <ul style="list-style-type: none"> <li>To review equality of opportunity or treatment</li> </ul> <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> <li>To review equality of opportunity or treatment</li> <li>To exercise or perform employment law rights or obligations</li> </ul>	<p>The following information you have provided via our equal opportunities monitoring form:</p> <ul style="list-style-type: none"> <li>Health data, including disability information*</li> <li>Information regarding pregnancy and maternity*</li> <li>Age and date of birth</li> <li>Marriage or civil partnership status*</li> <li>Gender</li> <li>Information on gender reassignment*</li> <li>Data revealing race, religious beliefs or sexual orientation*</li> </ul>

## 6. Information about criminal convictions

To enable us to make recruitment decisions and assess suitability for particular work, we will process information about criminal convictions and offences (including alleged offences) as described in this section 6.

We will process this information to enter a contract with you, to comply with a legal obligation, for our legitimate interests (in selecting suitable employees, workers and contractors), and to exercise or perform employment law rights or obligations.

If you have accepted an offer of work from us that is subject to a criminal record check, we will ask you to obtain a disclosure check (at the appropriate level) from Disclosure Scotland, and provide us with a copy of this.

## 7. Data necessary for the contract

Sections 5 and 6 above identify personal information that we may need to enter a contract with you. You are not obliged to provide this information, but if you don't provide it, we may not be able to proceed with the recruitment process or enter into the contract.

## **8. Statutory requirement to provide your personal information**

In some circumstances, the provision of your personal information relates to a statutory requirement. This includes:

- Documentation confirming your right to work in the UK – you are not obliged to provide this information, but if you don't provide it, we will not be able to enter into a contract with you.

## **9. Sharing your personal information with third parties**

We may share your personal information with the following third parties if this is required by law; necessary to enter a contract with you; where there is another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- Health professionals and occupational health providers involved in your care, in order to consider reasonable adjustments to the recruitment process for disabled applicants.
- Relevant regulators such as The Association of Chartered Certified Accountants, the Law Society of England and Wales and the Solicitors Regulation Authority.
- Our professional advisors.
- Other third parties as necessary to comply with the law.

## **10. Automated decision-making**

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

## **11. Transferring your personal information outside the EU**

We share your personal data within the GUS Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we do this, to ensure that your personal data is treated by those third parties securely and in a way that is consistent with UK data protection law, we require such third parties to agree to put in place safeguards, such as the EU model clauses or equivalent measures.

## **12. Data retention**

If you don't start work with us following the recruitment process, we will retain your personal information for six months thereafter:

- to allow us to establish, exercise or defend legal claims; and
- for our legitimate interests – to enable us to reconsider your application and (if appropriate) contact you, if the position you applied for becomes available again.

If you ask us to retain your personal information so that we can contact you to discuss future work opportunities, we will write to you separately, to obtain your explicit consent to retain your personal information for a fixed period of two years on that basis.

If you start work with us following the recruitment process, we will give you a copy of our Staff Privacy Notice, and will retain your personal information as detailed in the Staff Privacy Notice.

### **Your rights as a data subject**

As a data subject, you have the following rights in relation to your personal data processed by us:

- To gain access to your personal data;
- To rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;
- To have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
- To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.
- To restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period.
- To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.
- To not have decisions with legal or similar effects made solely using automated processing, unless certain exceptions apply.

Where we are relying on your consent to process your data, you may withdraw your consent at any time. Your requests will be considered at the latest within one month

If you require more information or have any queries, please contact our Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the [ICO's website](#)

**Staff Privacy Notice** InterActive Pro Limited ("we", "our", "us") are committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which any personal data we collect from you, or that you or any third parties provide, will be processed by us. We may

withdraw or modify this notice at any time and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

### **What is Personal Data?**

'Personal data' means any information which identifies you as an individual. It may include your name but it may also be other information such as your date of birth, nationality and gender which when combined identify you.

### **This Statement and InterActive Pro Limited data protection obligations**

In accordance with the General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018 (the "DPA"), together, the "Data Protection Laws", we are a Data Controller as we determine the purposes for which, and the manner in which, any personal data is, or is likely to be, processed. This means that we are legally responsible for the personal data we collect and hold about you. It also means that we must comply with the data protection principles (see below). One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect (and our legal basis for doing so), why we collect it, where we collect it from and whether (and with whom) we will share it. We also need to tell you about your rights in relation to the information. This notice provides further details about all of these issues.

In order to comply with our contractual, statutory, and management obligations and responsibilities, we need to process personal data relating to our employees, including 'sensitive' or special categories' of personal data, as defined in the Data Protection Laws which includes information relating to health, racial or ethnic origin, and criminal convictions.

All personal data will be processed in accordance with the Data Protection Laws and InterActive Pro Limited Privacy Policy: <https://www.interactivepro.org.uk/privacy-policy>

### **Using your information in accordance with Data Protection Laws**

Data Protection Laws require that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a 'legal basis' for the processing.

The legal bases on which your personal data are collected, the types of personal data, and the purposes for which they are processed is given below.

#### *Application for employment (Subsection)*

We need to process your personal data that you supplied to InterActive Pro Limited as part of your application for a position at InterActive Pro Limited. This is to ensure that your application can be considered by the relevant department. In your application we will collect the following information:

## **Personal data gathered**

In your application we will collect the following information

First Name(s)  
Last Name  
Title  
Other Name(s)  
Preferred Forename  
Your Address  
Postcode  
Telephone (Home)  
Telephone (Work)  
Telephone (Mobile)  
Your personal Email  
Details of your Secondary and/or Tertiary education  
Professional qualifications  
Statement in support of your application  
Details within your submitted Curriculum Vitae (CV)  
Details of your right to work in the UK

Information about your present and employment history for the previous five (5) years including:

Name of Employer(s)  
Address Line 1  
Address Line 2  
Town  
County  
Postcode  
Job Title  
Date From  
Date To  
Salary  
Notice Required

In addition, we may contact your referees as provided in your application to confirm the employment information that you provided.

## **Special categories personal data**

As part of the application you will be asked to provide equality and diversity information, this may include data concerning:

Any disability  
Your ethnicity  
Your sexual orientation  
Your religious beliefs  
You have the right to not provide this information, in which case InterActive Pro Limited will note to statutory bodies that you elected not to provide this information

## **Criminal records information**

In some circumstances we may process your information to undertake a Disclosure and Barring Service (DBS) check, as required by law.

### *During your employment (subsection)*

The Data Protection Laws define 'sensitive personal data' or 'special categories of personal data' as information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, genetic data, biometric data, data concerning sex life or sexual orientation. We will process this data, as well as the data provided in your application in order to perform our obligations arising from your contract of employment with us. The additional personal data we process to meet these responsibilities includes:

## **Additional data-personal information**

The additional personal data (including some special category personal data) we process to meet our responsibilities as an employer includes the following:

- Previous sickness information including the reasons for the absence
- Bank account details
- Passport details
- Visa details
- Sick pay
- Leave entitlement
- Parental pay
- Pensions data
- Remuneration and benefits
- Emergency contacts
- Trade Union Membership

## **Statutory responsibilities**

We may process your personal data in order to meet responsibilities imposed on us by legislation. The personal data processed to meet statutory responsibilities includes, but is not limited to, data relating to:

- tax;
- national insurance;
- statutory sick pay;
- statutory maternity pay;
- family leave;
- work permits, and
- equal opportunities monitoring.

## **Our lawful basis for processing**

The lawful bases for processing personal data will be:

Article 6(1) (b) Contract

Article 6(1) (c) Legal obligation  
Article 6(1) (f) Legitimate interest

### **Purpose of processing**

We will use your personal data in connection with your employment relationship with us, including for the following purposes:

To facilitate staff training, such as e-learning.

Managing our accounts and records and providing commercial activities to our clients.

For the use of CCTV systems to monitor and collect visual images for the purposes of security and the prevention and detection of crime – The CCTV policy can be found [HERE](#)

To provide you access to relevant systems to undertake your role.

To fulfil our obligations for the contract of employment.

Processing recruitment applications.

Talent, performance and succession planning.

Paying and reviewing salary and other remuneration and benefits.

Providing and administering benefits (including pension, voluntary healthcare schemes, salary sacrifice schemes and others).

Undertaking performance appraisals and reviews.

Policy and Legal Governance requirements and compliance.

Internal audit and data collection.

Legal compliance, requirements and obligations.

Maintaining sickness and other absence records.

Providing references and information to future employers and, if necessary, governmental bodies.

Processing information regarding equality of opportunity and treatment of data subjects in line with the monitoring of equal opportunities and access.

The information we process may be held on InterActive Pro Limited Corporate systems some of which may be owned and operated by third parties. Where we engage with such third parties, we insist upon strict contractual requirements to be adhered to by them to protect the personal data.

### **Special categories personal data**

The Data Protection Laws define 'sensitive personal data' or 'special categories of personal data' as information about racial or ethnic origin; political opinions; religious beliefs or other similar beliefs; trade union membership; physical or mental health; sexual life. In certain limited circumstances, the Data Protection Laws permit us to process such data without requiring the explicit consent of the employee.

(a) We will process sensitive personal data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and consent.

(b) Other than in exceptional circumstances, InterActive Pro Limited will process

sensitive personal data about an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding InterActive Pro Limited's equal opportunities policies and related provisions.

(c) Information about an employee's criminal convictions will be held as necessary and only in accordance with Data Protection Legislation.

The lawful basis for processing this special category personal data will be:

The GDPR Article 9(2)(b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

### **Sharing personal data**

We sometimes need to share the personal information we process with you and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Laws.

We may use third party providers to deliver our services, such as externally hosted software or cloud providers, and those providers may involve transfers of personal data outside of the EU. Whenever we do this, to ensure that your personal data is treated by those third parties securely and in a way that is consistent with UK data protection law, we require such third parties to agree to put in place safeguards, such as the EU model clauses or equivalent measures.

Where necessary or required we will share your information with:

- family, associates and representatives of the person whose personal data we are processing;
- current, past or prospective employers;
- healthcare, social and welfare organisations;
- suppliers and service providers;
- financial organisations;
- auditors;
- police forces, security organisations;
- courts and tribunals;
- prison and probation services;
- legal representatives;
- local and central government;
- consultants and professional advisers;
- trade union and staff associations;
- survey and research organisations, and
- press and the media.

Furthermore, in order to fulfil its statutory responsibilities, InterActive Pro Limited is required to provide some of an employee's personal data to government



departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

### **Automated processing**

InterActive Pro Limited does not use automated processing and decision making without manual intervention.

### **Principles**

We will handle your personal data in accordance with the principles set out below:

<b>Principle</b>	<b>Personal Data shall be:</b>
Lawfulness, fairness and transparency	be processed lawfully, fairly and in a transparent manner in relation to the data subject.
Purpose limitation	collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
Data minimisation	adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
Accuracy	accurate and, where necessary, kept up to date.
Storage limitation	kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
Integrity and confidentiality	processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
Accountability	be able to demonstrate compliance with the above principles

### **Keeping personal data up-to date**

The Data Protection Laws require us to take reasonable steps to ensure that any personal data we process is accurate and up-to-date. Employees are responsible for informing us of any changes to the personal data that they have supplied during the course of their employment. You can contact [cezannehr@gus.global](mailto:cezannehr@gus.global) to update your personal data.

### **Retention of your data**

InterActive Pro Limited retains personal information it collects from you where there is an ongoing business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When there is no ongoing business need to process your personal information, InterActive Pro Limited will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then InterActive Pro Limited will securely store your personal information and isolate it from any further processing until deletion is possible. Personnel files are retained for a period of at least 6 years from the date of termination of employment.

### **How does InterActive Pro Limited protect data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Your information will not be transferred outside of the EU.

### **Your rights**

Under certain circumstances, you may have the following rights in relation to your personal data:

**Right 1:** A right to access personal data held by us about you.

**Right 2:** A right to require us to rectify any inaccurate personal data held by us about you.

**Right 3:** A right to require us to erase personal data held by us about you. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).

**Right 4:** A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.

**Right 5:** A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation.

**Right 6:** A right to object to our processing of personal data held by us about you.

**Right 7:** A right to withdraw your consent, where we are relying on it to use your personal data.

**Right 8:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

## **Changes to our privacy Policy**

Any changes we make to this privacy notice in the future will be [posted on this page] and, where appropriate, notified to you by e-mail.

## **Who regulates the use of my personal information?**

InterActive Pro Limited maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation. InterActive Pro Limited registration number is Z1429382 and sets out, in very general terms, the full range of purposes for which we use, staff and all other personal information. Please visit the [Information Commissioners Office](#) website for details.

## **Who do I contact with questions?**

The data controller for the purposes of the General Data Protection Regulation is InterActive Pro Limited. If you have any questions or concerns about how your personal data is used, please consult <https://www.interactivepro.org.uk/privacy-policy>, and if you have a complaint please email InterActive Pro Limited Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the [ICO's website](#)

## **Former employees Privacy Notice**

InterActive Pro Limited ("we", "our", "us") are committed to protecting and respecting your privacy.

This privacy notice applies to former employees of InterActive Pro Limited.

It is important that you read this privacy notice together with our privacy notice at: <https://www.interactivepro.org.uk/privacy-policy> or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## **Information we collect**

InterActive Pro Limited does not collect personal data from former employees after they have left our employment, but it may hold the information that was collected before and during the employment relationship, including:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth • Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National insurance number
- Copy of identification (Passport/driving licence)
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means such as swipecard records
- Information about your use of our information and communications systems
- Photographs

### **Our lawful basis for processing**

The lawful bases for processing personal data will be:

- Article 6(1) (b) Contract
- Article 6(1) (c) Legal obligation
- Article 6(1) (f) Legitimate interest

### **How we process your information**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the obligations in a contract we have entered into with you, such as the employment contract, or a settlement agreement. Some of the

contractual obligations in these contracts continue after your employment has terminated, such as the duty to observe confidentiality.

2. Where we need to comply with a legal obligation.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your vital interests (or someone else's vital interests). Article 6(d).

2. Where it is needed in the public interest. Article 6(1) (e).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**We may process your data for the following purposes:**

- Paying you and deducting tax and National Insurance contributions and other lawful deductions.
- Providing you with any employee related benefits to which you are entitled after the termination of your employment.
- To reimburse you for expenses incurred in the course of your employment.
- Liaising with your pension provider and the trustees/administrators of pension schemes.
- Administering any contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Gathering evidence for possible grievance or disciplinary hearings.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- To prevent and detect fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies (such as the staff survey) to review and better understand employee retention and attrition rates.
- Equality and diversity monitoring
- Publicising our activities (e.g., group photos of events, site visits, etc.).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **How we process “special categories” of more sensitive personal information**

We may also store and use the following “*special categories*” of more sensitive personal information that we have collected from you:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Biometric data.
- Information about criminal convictions and offences.

These “*special categories*” of particularly sensitive personal information require higher levels of protection. We need to have further justification for storing and using this type of personal information. Our data protection policy contains details of the safeguards which we are required by law to maintain when processing such data.

We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection with employment.
2. Where it is needed in the public interest: for example, we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equality and diversity monitoring and reporting. Where possible, we would seek to anonymise this data.
3. In limited circumstances, with your explicit written consent. However, we do not need your consent to use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

### **Who is the information shared with**

We may share your data with third parties, including third-party service providers, Government departments and agencies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

**InterActive Pro Limited shares your data with:**

- Occupational Pension Scheme Trustees and Administrators.
- Occupational Health providers screening
- Trade Unions of which you are a member

**Retention**

InterActive Pro Limited will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected.

InterActive Pro Limited has a records retention schedule that outlines how long we will retain information.

To determine the appropriate retention period for personal data collected as part of your employment, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee we will retain and securely destroy your personal information after the following periods

- 12 months from date of leaving for employees; except
- Payroll, tax and NIC records which must be retained required for 6 years. This is a legal requirement.

However, these periods only apply to your employment records and not for example to images and materials created and use for marketing and communication purposes (e.g. group photographs taken at away days etc.)

**Your rights**

Under certain circumstances, you may have the following rights in relation to your personal data:

**Right 1:** A right to access personal data held by us about you.

**Right 2:** A right to require us to rectify any inaccurate personal data held by us about you.

**Right 3:** A right to require us to erase personal data held by us about you. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).

**Right 4:** A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.

**Right 5:** A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation.

**Right 6:** A right to object to our processing of personal data held by us about you.

**Right 7:** A right to withdraw your consent, where we are relying on it to use your personal data.

**Right 8:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

## **Changes to our privacy Policy**

Any changes we make to this privacy notice in the future will be [posted on this page] and, where appropriate, notified to you by e-mail.

## **Who regulates the use of my personal information?**

InterActive Pro Limited maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation. InterActive Pro Limited registration number is ZA1429382 and sets out, in very general terms, the full range of purposes for which we use, staff and all other personal information. Please visit the [Information Commissioners Office](#) website for details.

## **Who do I contact with questions?**

The data controller for the purposes of the General Data Protection Regulation is InterActive Pro Limited. If you have any questions or concerns about how your personal data is used, please consult <https://www.interactivepro.org.uk/privacy->



[policy](#), and if you have a complaint please email InterActive Pro Limited Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the [ICO's website](#)

## **InterActive Pro Limited Consultants Privacy Policy**

For the purposes of applicable data protection and privacy laws, InterActive Pro Limited ("**we**", "**our**", "**us**"), is considered the "Controller" in respect of the Personal Data that it collects, uses and manages in accordance with this Privacy Policy ("**Policy**").

Protecting your privacy is important to InterActive Pro Limited. We are committed to protecting all Personal Data provided to InterActive Pro Limited, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. Personal Data is information which relates to an identified or identifiable living individual.

This Policy explains what Personal Data we collect, how we may use and manage it and the rights you have in relation to your Personal Data. Before you provide us with any Personal Data or browse our websites, you should read through this Policy in full and make sure that you are comfortable with our privacy practices.

Please note that our websites may contain links to other websites, operated by third parties. These third party sites are not subject to this Policy and we recommend that you check the privacy and security policies of each website that you visit. We are only responsible for the privacy and security of the Personal Data that we collect and have no control over the actions of any third parties in relation to your Personal Data.

Please refer to the Glossary below for an explanation of the defined terms in this Policy.

### **Whose Personal Data do we collect?**

InterActive Pro Limited collects Personal Data from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers and other business contacts;
- consultants and contractors;
- users of our websites;
- individuals who contact us by any means; and
- job applicants.

### **How we collect your Personal Data**

We obtain Personal Data which you knowingly and voluntarily disclose to us, both in an online and offline context. We collect Personal Data when you:

- visit our websites and / or complete one of our web forms;
- communicate with us in any other way;
- complete surveys issued by us; and
- visit our premises.

We may also collect information received by us from third party sources, for example relating to your use of other websites which we operate and from related third parties such as subcontractors.

### **What Personal Data we collect**

InterActive Pro Limited may collect a range of Personal Data from you in a business context, such as your name, gender, job title, nationality, photographic identification, email address, home address and other contact details, details of your business and other interests, communications with you (including notes from meetings) and financial and payment information.

When you use our websites, we collect certain standard information that is sent by your browser to our websites. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses.

Special category personal data, e.g. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or medical conditions, genetic or biometric information and sexual orientation, may be processed by InterActive Pro Limited if such processing is necessary to comply with laws and regulations or where you consent for us to do so. For example, you may opt to provide us with certain Personal Data relating to your health when you submit a copy of our Equal Opportunities Classification Form.

### **The purposes for which we process your Personal Data**

We process your Personal Data for the following purposes:

- to provide you with information and services requested by you;
- to improve the services that we offer, and the events that we manage and host;
- to administer our websites and help improve our services;
- to carry out analytics in relation to the use of our websites;
- to notify you about changes to our websites;
- to manage our internal recruitment processes;
- to carry out payment procedures for consultancy related services;

- to enable us to monitor the implementation and impact of our equal opportunities policy;
- to comply with applicable laws and regulations; and
- other business-related purposes, including negotiating, concluding and performing contracts, administering payments made to us, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration.

### **Recruitment**

When you apply for a job via our websites or otherwise, we will collect additional more specific Personal Data about you, such as your qualifications, career history, third party references and interview notes.

Any Personal Data you provide to InterActive Pro Limited in relation to a job vacancy will be processed in accordance with our Recruitment Notice.

### **The legal basis for InterActive Pro Limited processing your Personal Data**

In order to comply with applicable data privacy laws, InterActive Pro Limited is required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for InterActive Pro Limited processing your Personal Data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- InterActive Pro Limited or our third parties' legitimate interests; or
- compliance with our legal obligations.

### **Who we share your Personal Data with**

InterActive Pro Limited may share your Personal Data with people within the company who have a "need to know" that data for business or legal reasons, for example, in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant department within InterActive Pro Limited.

We may disclose your Personal Data to third parties including the authorities, InterActive Pro Limited's advisors, suppliers of IT services and third parties engaged by InterActive Pro Limited for the purpose of providing services requested by you; to protect any intellectual property rights in any materials displayed on or otherwise available from InterActive Pro Limited 's websites; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation.

We may disclose your Personal Data to third parties in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets.

We may share the Personal Data you submit to us with any entity within the GUS group. These entities are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Policy.

We may decide to allow users to share comments, posting, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Finally, we may share non-Personal Data with other third parties that are not described above. When we do so we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means that we combine the non-Personal Data of numerous people together so that the data does not relate to any one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

### **Transfers of Personal Data**

Please note that any person to whom InterActive Pro Limited may disclose your Personal Data under this Policy may be situated in a country other than your own and that such country may provide a lower level of data protection requirements than your own country. By agreeing to this Policy, you consent to the transfer of your Personal Data to a country other than your own.

Whenever we transfer Personal Data across borders, we take legally required steps to ensure that adequate safeguards are in place to protect your Personal Data and to make sure it is treated in accordance with this Policy. If you are located in the EEA or the UK, you can request a copy of the safeguards which we have put in place to protect your Personal Data and privacy rights in these circumstances, using the contact details set out in the 'Questions and complaints' section below.

### **Security**

InterActive Pro Limited takes all reasonable technical and organisational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss and unauthorised access, destruction, misuse, modification or disclosure. We do our best to protect your Personal Data but unfortunately the transmission of information over the internet is not completely secure. We cannot guarantee the security of your Personal Data and any transmission of your data to InterActive Pro Limited is at your own risk.

If we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share this password with anyone. If you fail to keep your password confidential and this leads to a breach of security, we cannot be held

accountable for the loss or other compromising of any Personal Data belonging to you.

### **Cookies**

Our websites use cookies to improve your user experience. For detailed information on the cookies we use and the purposes for which we use them please see our [Cookie Policy](#).

### **Records retention**

Your Personal Data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records (including Personal Data) are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal Data they contain.

### **Your rights**

- Data protection legislation gives rights to individuals in respect of Personal Data that organisations hold about them. Under certain circumstances, you may have the following rights in relation to your personal data: Right 1: A right to access personal data held by us about you (please see section entitled "How can I access my personal information" below).
- Right 2: A right to require us to rectify any inaccurate personal data held by us about you.
- Right 3: A right to require us to erase personal data held by us about you. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
- Right 4: A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.
- Right 5: A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation.

- Right 6: A right to object to our processing of personal data held by us about you.

- Right 7: A right to withdraw your consent, where we are relying on it to use your personal data.

Right 8: A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop. Please submit your written request to our Data Protection Officer via: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk) . We ask that you always inform us of changes to your Personal Data so that we can keep it up to date.

### **Questions and complaints**

If you have a concern or complaint about this Policy or how InterActive Pro Limited has used your Personal Data, as a first step, you should raise this in writing with InterActive Pro Limited via:

Data Protection Officer

InterActive Pro Limited

30 Holborn

Buchanan House

London

EC1N 2LX

Email: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)

If you are not satisfied with the handling of your concern or complaint by InterActive Pro Limited, you can escalate this to the Information Commissioner's Office, which you can contact using the following details:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

[casework@ico.org.uk](mailto:casework@ico.org.uk)

### **Changes to this Policy**

We reserve the right to modify or amend this Policy at any time by posting the revised Policy on our websites. It is your responsibility to review the Policy every time you submit information to us.

## Glossary

<b>Controller</b>	A party that determines the purposes and means of data processing
<b>Data Protection Authority</b>	The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of GUS and/or GUS affiliates.
<b>European Economic Area (EEA)</b>	The EEA includes all European Union member states and Iceland, Liechtenstein and Norway
<b>Personal Data</b>	Information which relates to an identified or identifiable individual (i.e. data about InterActive Pro Limited employees, contractors, applicants, employees of vendors and suppliers, contractors, customers and individuals who use our websites or service centres). It includes names, addresses, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.
<b>Processing</b>	Doing anything with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.

Policy dated 10.06.2019

## Clients of InterActive Pro Limited (including employer clients)

### Types of personal information we collect

We collect, use and store different types of personal information about you, which we have grouped together as follows:

<b>Types of personal information</b>	<b>Description</b>
Identity Data	ID information including your name, marital status, title, date of birth and gender

Types of personal information	Description
Contact Data	Where you live and how to contact you
Financial Data	Your financial position, status and history, including bank details and credit rating
Transactional Data	Details about payments to and from you and other details about services you purchase from us and we purchase from you
Communications Data	What we learn about you from letters, emails and conversations between us
Publicly Available Data	Details about you that are publicly available, such as on Companies House or elsewhere on the internet
Consents Data	Any permissions, consents or preferences that you give us
Usage data	Information about how you use our website, products and services.
Special category Data	<p>Some types of personal information are defined as special. We will only collect and use these types of information where we need to and if the law allows us to:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions, religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic or biometric data used for ID purposes</li> <li>• Health data</li> <li>• Sex life and sexual orientation</li> <li>• Criminal convictions data</li> </ul>



## How we use your information

The table below outlines how we use your personal information and our reasons. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>• To receive the products or services you provide to us</li> <li>• To provide you with services and fulfil our contractual obligations</li> <li>• To provide you with other products or services that you may acquire from</li> <li>• To provide advice or guidance about our products or services</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual performance</li> <li>• Legal obligation</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To exercise our rights under contract and provide you with services agreed</li> <li>• To exercise our rights under contract and provide you with our products and services</li> <li>• To keep our records up to date, including your client file</li> <li>•</li> </ul>
<ul style="list-style-type: none"> <li>• To run our business in an efficient and proper way. This includes managing financial administration, business capability, planning, communications, corporate governance and audit</li> <li>• To improve our products and services and develop new ones</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual performance</li> <li>• Legitimate interests</li> <li>• Consent</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• To manage credit control and debt recovery</li> <li>• To bill for the services we provide and deal with funds transfers</li> <li>• For financial reporting</li> <li>• To manage complaints and claims</li> <li>• To be efficient about how we manage our relationship with you and fulfil our responsibilities generally</li> <li>• To improve our</li> </ul>

What we use your information for	Our reasons	Our legitimate interests
		<p>efficiency and provide clients with new or improved products and service</p>
<ul style="list-style-type: none"> <li>• For procurement purposes, including supplier due diligence, background checks and the assessing of tenders</li> <li>• To carry out credit checks</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To carry out supplier due diligence</li> <li>• To ensure our contracts provide us with best value</li> <li>• To assess the financial worthiness and reliability of those with whom we deal</li> </ul>
<ul style="list-style-type: none"> <li>• For marketing and business development activities, including seeking new business, promoting our business and events management.</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To develop our relationship with you and others</li> <li>• To attract new business</li> <li>• To promote our business</li> <li>• To hold events, such as seminars or corporate hospitality to promote our business and its services</li> <li>• To seek your consent if we need it to contact you</li> </ul>

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>For the prevention of crime and public safety, including through the use of CCTV</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To manage the risk of crime and safety for us, our employees and our clients</li> <li>To develop and improve how we deal with crime</li> <li>To report criminality or the suspicion of criminality for the wider benefit of society</li> <li>To be efficient about how we fulfil our responsibilities generally</li> </ul>

### Where we collect your personal information from

We may collect personal information about you from the following sources:

- Directly from you or the organisation for whom you work
- Companies or individual that tell you about us
- Publicly available resources, such as Companies House
- The internet and social networking sites such as LinkedIn
- Third parties with whom we deal with during the course of carrying on our business
- Market researchers
- Intermediaries with whom you are also a client
- Credit reference agencies and fraud prevention agencies

### Who we share your information with

We may share your personal information with the following third parties:

- Agents and service providers that we use during the course of providing services,
- Our professional advisors

- Other suppliers to the GUS Group
- The police and other law enforcement agencies where it is necessary to do so for the purpose of providing you with our services, or where we have a legal or regulatory obligation to do so
- Relevant regulators, including the Information Commissioner's Office in the event of a personal data breach
- Other companies owned or jointly owned by GUS
- Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business.

### **If you choose not to give your personal information**

If you choose not to give us your personal information, it may delay or prevent us from being able to comply with our own legal obligations. It may also result in us being unable to, or refusing to, engage you or your organisations as a client.

### **Automated decisions**

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

### **How long we keep your personal information**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In general terms, we will hold information for so long as you continue to provide us with products and services and for an additional period of 6 years thereafter.

### **International transfers**

As a global company, we hold some personal information concerning our suppliers and their affairs within the United Kingdom. We do work with agents and service providers who may process your personal information on our behalf outside the EEA. If your information is processed outside the EEA, we will ensure that it is protected to the same standards as if it were being processed within the EEA by putting in place a contract with our agents and service providers that provides adequate safeguards or using service providers that are certified on the US Privacy Shield framework.

## **Suppliers to InterActive Pro Limited**

### **Types of personal information we collect**

We collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	Description
Identity Data	ID information including your name, marital status, title, date of birth and gender
Contact Data	Where you live and how to contact you
Financial Data	Your financial position, status and history, including bank details and credit rating
Transactional Data	Details about payments to and from you and other details about services you purchase from us and we purchase from you
Communications Data	What we learn about you from letters, emails and conversations between us
Publicly Available Data	Details about you that are publicly available, such as on Companies House or elsewhere on the internet
Consents Data	Any permissions, consents or preferences that you give us

### How we use your information

The table below outlines how we use your personal information and our reasons. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>To receive the products or services you provide to us</li> </ul>	<ul style="list-style-type: none"> <li>Contractual performance</li> <li>Legal obligation</li> <li>Legitimate</li> </ul>	<ul style="list-style-type: none"> <li>For company management</li> <li>To maintain access and control records</li> <li>For incident/breach reporting,</li> </ul>

What we use your information for	Our reasons	Our legitimate interests
	interests	management and investigation
<ul style="list-style-type: none"> <li>To fulfil our contractual obligations</li> </ul>	<ul style="list-style-type: none"> <li>Contractual performance</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with our contractual obligations to you and your organisation</li> <li>To properly manage the risks and liabilities associated with the contracts we are party to</li> <li>To comply with laws and regulations that apply to us</li> <li>To protect our reputation</li> </ul>
<ul style="list-style-type: none"> <li>To enforce the terms of our contract with you</li> </ul>	<ul style="list-style-type: none"> <li>Contractual performance</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To ensure that we benefit from the terms of the contracts we have entered into and properly manage the risks and liabilities associated with them</li> </ul>
<ul style="list-style-type: none"> <li>For procurement purposes, including supplier due diligence, background checks and the assessing of tenders</li> <li>To carry out credit checks</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To carry out supplier due diligence</li> <li>To ensure our contracts provide us with best value</li> <li>To assess the financial worthiness and reliability of those with whom we deal</li> </ul>

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>For financial administration, including calculating and managing payments, benchmarking, calculating fees and interest and collecting and recovering money that is owed to us</li> </ul>	<ul style="list-style-type: none"> <li>Contractual performance</li> <li>Legitimate interests</li> <li>Our legal duties</li> </ul>	<ul style="list-style-type: none"> <li>To meet our contractual obligations to you or your organisation</li> <li>To ensure that we benefit from the terms of the contracts we have entered into and properly manage the risks and liabilities associated with them</li> <li>To comply with laws and regulations that apply to us</li> </ul>
<ul style="list-style-type: none"> <li>To establish, enforce and defend legal claims</li> </ul>	<ul style="list-style-type: none"> <li>Legal claims</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with laws and regulations that apply to us</li> <li>To respond to questions or complaints</li> <li>To maintain records to evidence matters that may be in dispute</li> </ul>
<ul style="list-style-type: none"> <li>To manage our business properly</li> <li>For corporate activity, such as a sale, transfer, merger or re-organisation of our business</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Contractual performance</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders</li> <li>To ensure that we run our business in accordance with good business principles and meet</li> </ul>

What we use your information for	Our reasons	Our legitimate interests
		corporate governance, accounting and audit standards
<ul style="list-style-type: none"> <li>For the prevention of crime and public safety, including through the use of CCTV</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To manage the risk of crime and safety for us, our employees and our clients</li> <li>To develop and improve how we deal with crime</li> <li>To report criminality or the suspicion of criminality for the wider benefit of society</li> <li>To be efficient about how we fulfil our responsibilities generally</li> </ul>

**Where we collect your personal information from**

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- Companies or individual that tell you about us
- Publicly available resources, such as Companies House
- The internet and social networking sites such as LinkedIn
- Third parties with whom we deal with during the course of carrying on our business
- Market researchers
- Intermediaries such as other companies who know you

**Who we share your information with**

We may share your personal information with the following third parties:

- Agents and service providers that we use during the course of providing services,



- Our professional advisors
- Other suppliers to the GUS Group
- The police and other law enforcement agencies
- Relevant regulators, including the Information Commissioner's Office in the event of a personal data breach
- Other companies owned or jointly owned by GUS
- Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business

### **If you choose not to give your personal information**

If you choose not to give us your personal information, it may delay or prevent us from being able to comply with our own legal obligations. It may also result in us being unable to, or refusing to, engage you or your organisations as a supplier.

### **Automated decisions**

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

### **How long we keep your personal information**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In general terms, we will hold information for so long as you continue to provide us with products and services and for an additional period of 6 years thereafter.

### **International transfers**

As a global company, we hold some personal information concerning our suppliers and their affairs within the United Kingdom. We do work with agents and service providers who may process your personal information on our behalf outside the EEA. If your information is processed outside the EEA, we will ensure that it is protected to the same standards as if it were being processed within the EEA by putting in place a contract with our agents and service providers that provides adequate safeguards or using service providers that are certified on the US Privacy Shield framework.

If you require more information or have any queries, please contact our Data Protection Officer at: [dpo@interactivepro.org.uk](mailto:dpo@interactivepro.org.uk)