Privacy Policy

Introduction

JTL is committed to data security and the fair and transparent processing of personal data. This privacy policy (**Policy**) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the Data Protection Act 2018 (**DPA 2018**), UK General Data Protection Regulation (**UK GDPR**) and the UK Data (Use and Access) Act 2025 (**DUAA**).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

Who are we?

JTL is a registered charity, charity number 312832 (England and Wales).

Our registered address is:

120 – 122 High Street
Orpington
Kent
BR6 0JS

For the purposes of the UK GDPR, JTL is the 'controller' of the personal data you provide to us.

You may contact JTL's Data Protection Officer by sending an email to dpo@jtltraining.com

JTL owns and operates; www.jtltraining.com (**website**). This Policy, together with our website terms of use and any other documents referred to in them, sets out the basis on which JTL processes personal data.

What personal data do we collect if you are a learner or potential learner (applicant) with JTL?

We may collect and process the following personal data:

- Name, address, email and phone number
- Date of birth
- National Insurance number
- Personal description
- Photograph
- Family status
- Social circumstances

- Access to Transportation
- Phobias
- Allergies
- Learning Difficulties
- Disabilities
- Care Status
- Household Situation
- Access to free school meals
- IP address
- Geographical location
- Browser type
- Device type
- Operating system
- Browsing data, such as access times
- Navigation history.

We may also collect sensitive information, including data about your:

- Physical health
- Mental health
- Racial or ethnic origin

What data do we collect if you are a customer/employer or potential customer/employer with JTL?

We may collect and process the following data:

- Company name, address, email and phone number
- Financial information
- Personal name
- IP address
- Geographical location
- Browser type
- Device type
- Operating system
- Browsing data, such as access times
- Navigation history.

How do we collect information about you?

If you:

- complete a form on our website.
- complete a survey.
- correspond with us by phone, e-mail, or in writing.
- report a problem.
- sign up to receive our communications.
- create an account with us.
- speak to us at an event.
- enter into a contract with us to receive products and/or services,

If you visit our website, we may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- information about your visit to our website such as the products and/or services you searched for and view, 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.

Information we receive from other sources

We may also receive information about you if you use any of the other websites we operate or the other services we provide in partnership with third parties.

If you are a tutor, apprentice, or learner, we may also receive information about you from your centre, or employer when they register to receive products and/or services form us.

Information about other people

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

Sensitive personal data

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, physical or mental health). However, we will only do so on the basis of your explicit consent.

How do we use your personal data?

When we ask you to supply us with personal data, we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

Contract performance:
We may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide the products and/or services to you.
- to communicate with you in relation to the provision of the contracted products and services including assessment.
- to provide you with administrative support such as account creation, security, and responding to issues; and
- provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

Legitimate interests:
Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our awards and events, offers, and related to products and services offered by JTL which may be of interest to you.
- contacting you to provide you with information about JTL Group products, services, and developments.
- communicating with you in relation to any issues, complaints, or disputes.
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our website.
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns.

NOTE: you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your Rights.

Consent:
Where you have given your express consent to receive marketing communications, we may use your personal data to:

- send you newsletters, surveys, information about our award, events, offers, and promotions, related to products and services offered by JTL which may be of interest to you.
- To develop, improve, and deliver marketing and advertising for products and services offered by JTL.

Where required by law:
We may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud. This may include a duty to provide information to government agencies for public health reasons such as to facilitate pandemic control measures.

Who do we share your personal data with?

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

Internally we share your personal data with the whole of the JTL Group which consists of JTL and CompEx Certification Ltd.

We may also share your personal data with trusted third parties including:

- establishments which JTL partner with to provide apprenticeship training and or support.
- Employers who the apprentice is employed by and prospective employers seeking to employ apprentices.
- legal and other professional advisers, consultants, and professional experts.
- educational establishments that may assist in the delivery of products and services offered by JTL
- service providers contracted to us in connection with provision of the products and services such as providers of IT services, and customer relationship management services; and
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third-party recipient is located outside the United Kingdom, we will ensure that the transfer of personal data also meets the requirements of the third-party country if that requirement is greater than United Kingdom data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law. This may include a duty to provide information to government agencies for public health reasons such as to facilitate pandemic control measures.

How long will JTL keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of at least 6 years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us, visiting our website or emailing dpo@jtltraining.com

Where do we store your personal data and how is it protected?

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach if it is likely to be of high risk to your rights and freedoms or is likely to result in a risk to you.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

Your rights

Under the UK GDPR, you have various rights with respect to our use of your personal data:

Right to Access
You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your

request information that will enable us to verify your identity. We will respond within 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information or if your request is manifestly unfounded or excessive.

Right to rectification
We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to erasure
You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object
In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to restrict processing
In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability
In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing

is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the UK GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception, we will explain this to you in our response.

Contact

If you would like to contact us about this Policy, our use of your personal data, or about exercising any of your rights, please contact us by email at dpo@jtltraining.com or by writing to us at:

Data Protection Officer - JTL
Stafford House, 120 – 122 High Street
Orpington
BR6 0JS

Concerns

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts.

Please visit https://ico.org.uk/concerns/ for more information on how to report a concern to the UK Information Commissioner's Office.