

CUSTOMER PRIVACY NOTICE

BACKGROUND:

Wyvern Business Systems Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Wyvern Business Systems Limited.

A limited Company registered in England under company number 03759062.

Registered address: Wyvern Business Systems Ltd, Wyvern House, Netherwood Road, Hereford, HR2 6JJ.

VAT number: GB 394 0732 42

Data Protection point of contact: David Atkinson

Email address: enquiries@wbs.uk.com

Telephone number: 01432 271233

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we will use it with your consent or for the performance of a contract, and that if data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

Further information about your rights are set out in our Subject Access Request Procedure which is available on request or you can also contact the Information Commissioner's Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Student ID/reference number
- Payment information;

- Information about your preferences and interests;
- Funding Letter
- Place of Education

Your personal data is obtained from the following third parties:

- Funding Body (SFE, SFW, Open University and NHS)
- University
- Assessment Centre
- 3rd Party Insurance Provider

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it.

Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and necessary Privacy and Electronic Communications legislation, and you will always have the opportunity to opt-out.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reasons for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no

fixed period, the following factors will be used to determine how long it is kept):

- For the length of your course plus one year to provide for any course extensions, technical issues or to fulfil the requirements of our contract with you.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the “EEA”). This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

9. Do You Share My Personal Data?

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may also share your personal data with the following third parties to supply products and services to you on our behalf. These may include payment processing, delivery & courier services, insurance providers, marketing platforms, data centres and back up providers, trainers, auditors and bodies whom we are accredited to. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”. For further information please request a copy of our Subject Access Request Procedure. Any enquiries should be sent to the email or postal address below.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of David Atkinson):

Email address: enquiries@wbs.uk.com

Telephone number: 01432 271233

Postal Address: Wyvern Business Systems Ltd, Wyvern House, Netherwood Road, Hereford, HR2 6JJ.

This policy is reviewed annually. **Last reviewed: 15/10/2019.**