

## Privacy Policy – Aspire Procurement Training Ltd

We take your privacy seriously and we respect your privacy and data protection rights. This privacy notice aims to give you information on how we collect and process your personal data through your use of our website and our services, including any data you may provide through our websites, and our services when you sign up to courses, provide us with feedback or make enquiries.

Please take time to read this privacy notice in full, together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, to ensure that you understand and are happy with how we collect and process your personal data.

### 1. Controller

We have appointed a data protection officer (**DPO**), who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights](#), please contact the DPO using the details below:

### 2. Contact Details

Our full details are:

Data Protection Officer

[aspirecips@gmail.com](mailto:aspirecips@gmail.com)

**International Business Centre, Delta Crescent, Westbrook, Warrington, Cheshire WA5 7WQ**

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the supervisory authority for data protection issues in the UK (phone: [0303 123 1113](tel:03031231113) or at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please feel free to contact us in the first instance.

### 3. Changes to this Privacy Notice and Changes to Your Details

We will need to update this privacy notice from time to time as the law and/or our business changes and develops. We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise, please look out for the flags on our websites and materials that indicates we have changed this privacy notice. If you continue to use our websites and/or services after we have changed our privacy notice, we will take this as an indication that you accept the changes.

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

#### 4. Third Party Links

Our websites and/or the service may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties (for example, CIPS) to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, mobile app and/or service, we encourage you to read the privacy notice of every website, plug-in and/or application that you visit.

#### 5. The Personal Data We Process

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may process different kinds of personal data about you, which we have categorised as follows:

- **Identity Data:** including your name, CIPS unique identification numbers that we may apply to you, email address, date of birth and gender.
- **Contact Data:** including your billing address, delivery address, email address and telephone number(s).
- **Financial Data:** including payment card details.
- **Transaction Data:** including the details of the products and services purchased and the date, time and location of sale and your purchasing activity.
- **Technical Data:** including information we collect through your use of our websites and mobile apps, where you came to our website from and where you went when you left our website, how often you visit and use our websites and mobile apps, technical information about the devices you use to access our websites and mobile apps (including your device's unique identifying codes (e.g. its "MAC" address), relevant IP address, operating system and version, web browser and version, and geographic location).
- **Profile Data:** including your name, purchases, orders or course bookings made by you, your feedback, your survey responses, your social media content (where this is in the public domain including posts and comments, pictures and video footage) and profile information and insight from organisations that already hold information on you (such as credit reference agencies and 'customer insight companies' who give us their views on your household, your status, as well as your possible preferences and behaviours).
- **Usage Data:** including information about how you use our website, mobile apps, products and services.
- **Marketing and Communications Data:** including your preferences in receiving marketing from us and our third parties, your communication preferences and information on what you view, click on and access in and through our marketing emails, text messages and push notifications.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. **Aggregated Data** may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your **Usage Data** to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect **Aggregated Data** with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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 in to with you (for example, to provide you with products 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.

## 6. How we collect your personal data

We use different methods to collect personal data from and about you including through:

- **Direct Interactions:** you may give us your Identity, Contact, Financial, Profile and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you purchase our products or services.
- **Social Media Interactions:** our website and services may allow you to interact with them by using your social media applications. This interaction may result in us collecting some of your social media content (including posts and comments, pictures and video footage), but only where this content is in the public domain and/or where this content has been sent by you to us in a private message via social media; and also your Technical, Profile and Marketing and Communications Data.
- **Automated Technologies:** as you interact with our website and our services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Other Third Parties or Publicly Available Sources:** we may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google, advertising networks search information providers.
  - Marketing and Communications Data and Technical Data from online advertising data providers such as Google based outside the EEA.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Profile Data and Marketing and Communications Data from social media providers such as Facebook based inside and outside of the EEA
  - Identity, Contact and Profile Data from data brokers or aggregators.

- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.

## 10. How we process your personal data

We only process your personal data when allowed to do so by law. Most commonly, we will process your personal data:

- With your consent and please note that you have the right to withdraw your consent at any time.
- Where we need to perform a contract we are about to enter into, or have entered into, with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

## 11. How we share your personal data

We cannot run our business or provide many of the services and benefits you expect to receive without involving other people and businesses. We only share your information in accordance with the laws applicable to us and for the purposes set out in the table in paragraph 8 above.

We share your personal data with:

- **The Chartered Institute of Procurement & Supply (CIPS).**
- **Service providers** (mainly acting as processors, but sometimes as controllers) who help us provide our websites, mobile apps, Wi-Fi networks and related services to you; for example, information technology companies who design and host our websites, payment services companies who enable you to use credit or payment cards with us, and data insight specialists.
- **Affiliated third parties** (acting as processors and controllers) that provide services to us such as market research, marketing insight services and data analytics services.
- Any new **business partners** (acting as controllers or processors) we may have over time; for example if we enter into a joint venture, reorganisation, business merger or sale of part of our business, the other party may receive some or all of your information.
- Our **professional advisors** (acting as controllers or processors); for example, our lawyers, insurers and insurance brokers, when they need it to provide advice to us or help us obtain insurance.
- The **Police**, the Health and Safety Executive, **local authorities**, **Her Majesty's Revenue and Customs (HMRC)**, the **Courts** and any other **central or local government bodies** (acting as controllers or processors) where we are required to do so to comply with our legal obligations, or where they request it and we may lawfully disclose it, for example for the prevention and detection of crime or to report serious health and safety incidents.

- We also may share the information we collect with **other third parties** where we are legally obliged to do so; for example, to comply with a court order.

## 12. How We Keep Your Personal Data Secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times, including where we share your information with our suppliers and partners, to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please take care of your own information. For security tips and tricks when using the internet, Wi-Fi and smartphones or tablets, please visit [www.getsafeonline.org](http://www.getsafeonline.org).

## 14. Our Retention of Your Personal Data

We can only keep your personal data for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The precise length of time we hold your personal data for varies depending on the individual circumstances, but in determining 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.

## 15. Your Rights

In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether or not a candidate has unspent criminal convictions).
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Rectification:** you may request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Erasure:** you may request erasure of the personal data that we hold about you. 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object:** you may object to how we are processing 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Restriction:** you may request that we restrict how we process your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdrawal of Consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise any of these rights please contact us using the details in paragraph 2.

The ICO regulates most UK data and information laws. To learn more about your rights, visit the ICO website at [www.ico.org.uk](http://www.ico.org.uk).