

N.A.P.P.I. (UK) Limited - Course Participant Data Protection Statement

In the course of our business we collect, store and process personal information about those people who register for and/or attend any of our courses (including any of our distance learning courses).

This Data Protection Statement (“**this Statement**”) explains what information we collect from and about those people who register for and/or attend any of our courses, how their information will be used, how we determine for how long we keep it and what their related rights are.

1. Who are we?

- 1.1 We are N.A.P.P.I. (UK) Limited (registered company number 03050134). Our registered office and address for correspondence is 64 Falsgrave Road, Scarborough, YO12 5AX.
- 1.2 We are committed to ensuring that all personal information we hold is treated properly and in accordance with applicable data protection legislation. We are registered as a data controller with the Information Commissioner’s Office and our registration number is Z8019492. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal information which we collect about you.
- 1.3 This Statement applies to anybody who registers for and/or attends any of our courses (including any of our distance learning courses). This Statement covers the personal information we collect in connection with each such matter and in connection with each such individual’s involvement with us.
- 1.4 You promise that any information you supply to us is accurate and up-to-date, that you will inform us if any such information requires updating and that where you submit any other person’s details to us you have that other person’s permission or are otherwise legally permitted to do so on their behalf.
- 1.5 You have the right to lodge a complaint with the Information Commissioner’s Office (“**ICO**”) if you have any concerns with regard to the way in which we process your personal information. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. What information do we collect and how do we use it?

Participants in any of our Onsite or Open Courses

Where you register for and/or attend any of our onsite or open courses (including but not limited to any of our Training of Trainers or Mini Trainer courses):

- 2.1 We will collect the following information from you and/or (if applicable) the organisation that you represent during the initial registration process and in connection with your subsequent participation on the course itself:
 - (a) your name, address (which may be the address of the organisation that you represent if applicable), email address and mobile telephone number. This information may also include assessment information and other records of your participation in the relevant course (for example, in relation to attitudes, behaviour and credibility shown by you while attending the course, knowledge of theory, agreed action plans and video recordings of your participation) and any feedback that you may provide to us in connection with the relevant course or our services in general; and

- (b) if the course involves a physical skills element that you or (if applicable) your organisation wishes for you to participate in, we will also collect more sensitive personal information relating to your health (including any physical or other medical condition, your ability to participate in the relevant physical skills element and any injuries that you may suffer during your participation in any physical skills element).

We will use your information as follows where you register for and/or attend any of our open or onsite courses:

2.2 The information described in section 2.1(a) above will be used by us as necessary for our legitimate interests in the circumstances described below:

- (a) to process your registration on the relevant course and allow you to participate in the course;
- (b) to monitor, report on and assess your level of performance during your participation in the relevant course (including the making of any relevant recommendations);
- (c) (if applicable) to notify your organisation of any relevant matter relating to you which arises during your participation in the relevant course (for example, any concerns we may have in relation to your attitude, behaviour or credibility shown during the relevant course);
- (d) (if applicable) to carry out our obligations arising from any contract entered into between us and the organisation that you represent;
- (e) where it is necessary to establish, exercise or defend any legal claim;
- (f) to deal with and respond to any queries, enquiries or complaints that we receive;
- (g) in connection with any internal or external audit that we undergo; and
- (h) to assess and improve the quality of our services.

2.3 Any sensitive information that we may collect relating to your health (see section 2.1(b) above) will be used by us in the following circumstances:

- (a) to comply with a legal obligation to which we are subject (for example, to comply with health and safety requirements);
- (b) where it is necessary to establish, exercise or defend any legal claim; and/or
- (c) where it is necessary to protect the vital interests of you or another person where you are physically or legally incapable of giving us consent.

Participants in any of our Distance Learning Courses

Where you register for and/or attend any of distance learning courses:

2.4 We will collect the following information from you and/or (if applicable) the organisation that you represent during the initial registration process and in connection with your participation in the course itself: your name, address (which may be the address of the organisation that you represent if applicable), email address, mobile telephone number, date of birth, nationality and (where you are paying for the relevant course personally) bank account details and/or payment card details. This

information may also include assessment information and other records of your participation in the relevant course (for example, knowledge of theory and video recordings of your participation) and any feedback that you may provide to us in connection with the relevant course or our services in general.

We will use your information as follows where you register for and/or attend any of our distance learning courses:

2.5 We will use such information as necessary for our legitimate interests in the circumstances described below:

- (a) to process your registration on the relevant course and allow you to participate in the course;
- (b) to monitor, report on and assess your level of performance during your participation in the relevant course (including the making of any relevant recommendations);
- (c) to communicate with you in relation to your registration for, and participation in, the relevant course (including to send you copies of any related resources);
- (d) (if applicable) to notify your organisation of any relevant matter relating to you which arises during your participation in the relevant course (for example, any concerns we may have in relation to your attitude, behaviour or credibility shown during the relevant course);
- (e) to register you with any relevant awarding body (please note that this will require us to disclose your name, date of birth and nationality to the relevant awarding body);
- (f) where it is necessary to establish, exercise or defend any legal claim;
- (g) to deal with and respond to any queries, enquiries or complaints that we receive;
- (h) in connection with any internal or external audit that we undergo; and
- (i) to assess and improve the quality of our services.

2.6 If you are paying for the relevant course personally, we will use your bank account details and/or payment card details where necessary for the performance of any contract between us (for example, to take payment from you of our fee for the relevant course and to issue any refunds that may become payable). Where you are paying by card, you will be redirected to the website of our payment services provider SagePay in order to make your payment (we do not store any card details on our servers). After the payment has been completed you will be redirected back to our website. Please note that SagePay may collect personal information from you which will be used in accordance with SagePay's own privacy policy (which you should read). More information regarding SagePay can be accessed via the following URL: www.sagepay.co.uk. We are not liable for the practices of SagePay in respect of your personal information.

2.7 You promise that, where you are required to submit to us any video footage of your participation in any distance learning course, you will submit such footage to us using any secure transfer facility or other submission method that we from time to time make available to you or notify you of.

Additional information relevant to all of our courses

2.8 In limited circumstances, we may approach you for your consent to allow us to process certain information for purposes not referred to in this Statement. If we do so, we will provide you with details of the information we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us. If you do provide us with consent, you will be able to withdraw it at any time via the method that we notify you of when obtaining your consent. Any such withdrawal will not affect the lawfulness of our processing of your personal information based on your consent before you withdrew it.

2.9 If you fail to provide information when requested which is necessary for us to process in connection with your registration for and/or participation in any of our courses, you will be unable to participate in the relevant course or be eligible for any related accreditations (for example, date of birth and nationality in connection with distance learning courses). We may also be in breach of our legal obligations (such as to ensure the health and safety of our staff, contractors and course participants).

3. Information Relating to Further Training Opportunities

3.1 Where you have given us your consent, we may use your name and relevant contact details to provide you with information on further training opportunities available from us by email or by telephone.

3.2 You may withdraw your consent to us using your information for the purposes mentioned in section 3.1 above at any time. This can be done by e-mailing us at info@nappiuk.com, writing to us at N.A.P.P.I. (UK) Limited, 64 Falsgrave Road, Scarborough, North Yorkshire, United Kingdom, YO12 5AX or clicking on the appropriate link of any of our related e-mails. Any such withdrawal will not affect the lawfulness of us sending such communications to you before you withdrew your consent.

3.3 Please note that if you withdraw (or do not provide) your consent to us sending you such information, this will mean that you will not be notified by us of any further training opportunities available from us.

4. To whom will we disclose your personal information?

You will be asked before we disclose your personal information to third parties, unless:

4.1 they are only processing your information on our behalf for specified purposes in accordance with our instructions;

4.2 such disclosure is required by law;

4.3 the third party is providing us with professional advice where necessary for our legitimate interests and permitted by law;

4.4 the disclosure is necessary for our legitimate interests in connection with obtaining or maintaining any professional accreditations relating to your participation on any of our courses or any of our other activities, including but not limited to Pearson Edexcel and the British Institute of Learning Disabilities Physical Interventions Accreditation Scheme;

- 4.5 the disclosure is to one of our suppliers in respect of any feedback that you provide to us relating to any of our courses or services and it is in our legitimate interests in improving our services for the relevant supplier to be able to use that feedback;
- 4.6 the disclosure is in connection with criminal investigations, legal proceedings or prospective legal proceedings where necessary for our related legitimate interests and permitted by law;
- 4.7 the disclosure is necessary for our legitimate interests in establishing, exercising or defending our legal rights (including providing information to others for the purposes of fraud prevention) and permitted by law;
- 4.8 the disclosure is necessary to protect the interests of you or another person where you are physically or legally incapable of giving us your consent;
- 4.9 the disclosure is in connection with a proposed sale of any part of our business or assets (in which case we may disclose your personal information to the prospective seller or buyer of such business or assets and/or their professional advisors) or the proposed acquisition of substantially all of our assets by a third party. Any such disclosure will be made where necessary for the legitimate interests of us and/or the third party in respect of the proposed transaction; however we will not transfer your personal information to any such third party unless we are satisfied that they are able to provide an adequate level of protection in respect of your personal information; or
- 4.10 we have stated or informed you otherwise (including elsewhere in this Statement) and such disclosure is permitted by law.

5. Your rights

- 5.1 You have a legal right to see a copy of the personal information that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:
 - (a) request that we erase any personal information held about you;
 - (b) restrict our processing of your personal information (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
 - (c) data portability (i.e. to request the transfer of personal information to a third party); and
 - (d) object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party).
- 5.2 Requests in respect of the above should be made in writing to our Privacy Manager at N.A.P.P.I. (UK) Limited, 64 Falsgrave Road, Scarborough, YO12 5AX or via email at privacy@nappiuk.com. Please contact the same address if you have any reason to believe that information we hold about you is inaccurate. We will respond to your request as soon as possible and, in any event, within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (e.g. if, in the circumstances, the right does not apply to you).
- 5.3 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 5.1 above.

5.4 You will not generally have to pay a fee to exercise any of your rights described in section 5.1 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively we may refuse to comply with your request in such circumstances.

6. Security, retention and destruction of your personal information

6.1 We have put in place appropriate security measures to prevent your personal information 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, agents, contractors and other third parties who have a business need to know that information.

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

6.3 Any personal information held by us in relation to any of the purposes described in this Statement will be retained by us for as long as we need it to fulfil the purpose(s) for which it was collected (including for the purposes of satisfying any legal, accounting or reporting requirements). Further details of our specific retention periods are set out in our information retention policy (a copy of which is available upon request from our Privacy Manager).

6.5 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it; securely delete personal data that is no longer needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

7. How will you know if we make any changes to this Statement?

7.1 This Statement does not form part of any contract to provide services.

7.2 We may amend this Statement at any time. If we make any changes to the way in which we use your personal information we will notify you by writing to you or by sending you an e-mail.

8. Contact

If you have any questions about this Statement or our treatment of your personal information, please contact our Privacy Manager by email at privacy@nappiuk.com.