



Privacy Notice

Skills Office Network, and its training divisions Momentous Learning, is committed to protecting your personal data. This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) aims to enhance privacy rights for individuals and provides a strict framework within which commercial organisations can legally operate.

Post Brexit, the UK has incorporated the EU GDPR legislation into UK law with the Data Protection Act 2018 and the UK GDPR. This means that all parts of the GDPR are still applicable to UK businesses, but now under the UK Data Protection Act (DPA).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Please note that we may amend this policy from time to time.

Information you give to us, or we collect about you

This is information about you that you give us by filling in forms on our site, <u>www.skillsofficenetwork.co.uk</u> or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you subscribe to our services or other social media functions on our site and when you report a problem with our site.

The information you provide to us, or we collect about you may include:

- Your name, organisation name, address, private and corporate e-mail address and phone number as well as links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website
- Personal and contact information when you are referred to us, including your name, address, email address, telephone number(s), health information, ethnicity, employment history, title, gender, date of birth. We may collect or generate some additional information about you during onboarding and induction and at subsequent meetings.
- Copies of documents you provide to prove your identity (including birth certificate or passport), where there is a legal reason to request this from you.
- Details (and copies) of your communications and interactions with us.
- Information about how you use our website.
- We may also receive personal data directly from you or from various third parties and public sources, including from social media channels (if you interact with us through those channels), or other third parties including from employers or recruitment agencies.

Information we collect about you when you visit our website

With regards to each of your visits to our site we will automatically collect the following information:

- 1. Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, browser plug-in types and versions, operating system and platform;
- 2. Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times,





download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.

We may work closely with third parties including business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers and professional advisors.

Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

- 1. To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us.
- 2. Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation, and consent for specific uses of data.
- 3. We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.
- 4. We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.
- 5. We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a third party, or to access your personal data from a third party.

How and why we use your personal information

It is sometimes necessary for us to process your personal data in order to enter into a contract with you, or to satisfy a contractual requirement, or to comply with a statutory requirement.

We will only use your personal data if the law allows us to. Circumstances may include:

- 1. To make it available to our consultants in connection with our provided services unless you request otherwise.
- 2. To verify your identity, we may require copies of your documents.
- 3. To verify your eligibility, we may require documentary evidence.
- 4. As part of service delivery, whilst on programme, we will use your information to schedule activities, complete action plans and assessments, support your progression and to support evidence of our interactions.
- 5. In management information used to monitor initiatives and equal opportunities policies.
- 6. If required by law or for the purposes of our business requirements (e.g. to auditors or third-party service suppliers).
- 7. To provide you with information about other services and opportunities we offer that are like those that you have already enquired about.
- 8. To contact you about industry and sector specific information that might be of interest to you.
- 9. To notify you about changes to our service.
- 10. To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

Privacy Notice Reviewed April 2025





- 11. To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- 12. To allow you to participate in interactive features of our service when you choose to do so.
- 13. To personalise the content displayed on our website to present you with more relevant content based on your interests, location or both.
- 14. As part of our efforts to keep our site safe and secure.
- 15. To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this processing at any time.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

Cookie policy

Our sites use cookies to distinguish you from other users of our sites. This helps us to provide you with a pleasant experience when you browse our sites and allows us to improve our site. By continuing to browse our site, you are agreeing to our use of cookies.

A cookie is a small text file that is stored by your browser on your device or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive or device.

We may use the following cookies:

- 1. Essential cookies: these are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site.
- 2. Analytical/performance cookies: they allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.
- 3. Functionality cookies: these are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of region).
- 4. Targeting cookies: these cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our site, and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.





Disclosure of your information inside and outside of the EEA

We may share your personal information with:

Any member of our group both in the EEA and outside of the EEA where applicable. Additionally, we may share your personal data with selected third parties including:

- 1. Relevant third-party partners.
- 2. Analytics and search engine providers, some of which may be overseas, that assist us in the improvement and optimisation of our site and with the verification of placements; and
- 3. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- 4. If we or one of our subsidiaries has substantially all of its assets acquired by third party, in which case personal data held by it about its clients will be part of the transferred assets; and we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights or property of our, our customers' or others' safety. The lawful basis for the third-party processing will include:
- 1. Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs.
- 2. Satisfaction of their contractual obligations to us as our data processor.
- 3. To fulfil their legal obligations.

Where we store and process your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), where it has been deemed that appropriate safeguards are in place.

It may be transferred to third parties outside of the EEA for the purpose of our services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

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 data transmitted to our site; any transmission is at your own risk.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. We segregate our data so that we keep specific types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- 1. The nature of the personal data.
- 2. Its perceived accuracy.
- 3. Our legal obligations.





Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by contacting us at info@skillsofficenetwork.co.uk

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The GDPR provides you with the following rights. To:

- 1. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 2. Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- 3. Object to processing of your personal information 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.
- 4. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 5. Request the transfer of your personal information to another party in certain formats, if practicable.
- 6. Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <u>https://ico.org.uk/concerns/</u>

Access to information

The Data Protection Act 2018 and the UK GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with GDPR.

A subject access request should be submitted to <u>hello@momentouslearning.co.uk</u>

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to <u>info@skillsofficenetwork.co.uk</u> or by calling 0333 358 0579. Please note we may keep a record of your communications to help us resolve any issues which

Please note we may keep a record of your communications to help us resolve any issues which you raise.





This policy is reviewed annually to ensure it remains fit for purpose, compliant with regulatory requirements, and reflective of current practice.

Approved by (Director Name)	James Neilands
Director Signature	Janes 100
Date	April 2025