

# Privacy Policy

## Introduction

The Academy of Leadership & Management is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we collect, use, disclose, transfer, and store your personal information.

Please read this Policy carefully as it contains important information on:

- who we are, how and why we collect, store, use and share your personal data
- your rights in relation to your personal data
- how to contact us
- how to contact supervisory authorities in the event that you would like to report a concern about the way in which we process your personal data

## Who we are

In this privacy policy references to *we*, *us* and *our* are to The Academy of Leadership & Management. References to *our Website* or *the Website* are to [www.academylm.co.uk](http://www.academylm.co.uk). References to our *Virtual Learning Environment* are to our online learning platforms, or those that we are contracted to manage on behalf of clients.

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), The Academy of Leadership & Management is a 'controller' and 'processor' of learner personal data. The Academy of Leadership & Management is a private limited company, registered number SC402385. Our registered address is 24 Sandyford Place, Glasgow, G3 7NG.

The Academy of Leadership & Management provides, learning, training and certification products and services in relation to leadership and management and other related subject areas. If you have any queries about this policy, the way in which we process personal data, or about exercising any of your rights, you may contact our Privacy Officer by sending an email to [info@academylm.co.uk](mailto:info@academylm.co.uk) or writing to Privacy Officer, The Academy of Leadership & Management, 24, Sandyford Place, Glasgow G3 7NG.

## What personal data do we collect?

When you register for a product or service from us e.g. a training course, we will normally collect the following information:

- Name – first name and surname
- Date of birth
- Gender
- Residential address
- Email address
- Telephone number
- Employer name and address

We may also collect other categories of personal data if required in relation to a specific qualifications, courses or products if required to carry our assessment, quality assurance processes, investigations, complaints and appeals. This personal data is provided to us in order for you to receive learning, training, and certification products and services provided by us.

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In exceptional circumstances, we may collect sensitive personal data, such as information about your health, to enable us to administer requests for adjustments in relation to your learning and assessment where requested, or relating to an investigation, complaint, or appeal. Such information will only be provided to the awarding body that accredits or regulates your course or qualification if you have given your explicit consent.

When you visit our Virtual Learning Environment, we receive information about you in two ways:

**Automatically:** This includes your IP address and browsing behaviour.

**Directly from you:** This is usually your contact details and any other information you provide as part of your participation on a course or other learning product. We use this information to manage your learning, assessment and training on courses in which you are participating and to provide you with information, products or services that relate to your learning, where you have agreed to be contacted for such purposes.

We may also collect and process personal data 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;
- enter into a contract with us to receive products and/or services,

This will normally include your name, e-mail address, postal address, telephone number and job role.

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 about other people

If you provide information to us about any person other than yourself, such as your employer, 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. However, we will only do so by explaining the reason why and on the basis of your explicit consent.

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## 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 for which you have registered
- to communicate with you in relation to the provision of the contracted products and services;
- to undertake assessment, quality assurance and administration in relation to the contracted products and services
- assess and provide reasonable adjustments in relation to your learning and assessment where requested
- provide you with a certificate, credential or other record of learning
- contact you directly in relation to our quality assurance processes, investigations, appeals and complaints
- provide you with information about 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, offers, and promotions, related to products and which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns.

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:

- providing you with newsletters, surveys, information, offers, and promotions, related to products and which may be of interest to you
- developing, improving, and delivering marketing and advertising for products and services offered by the Academy of Leadership & Management.

**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.

## 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.

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

- 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
- the body that accredits or regulates your course or qualification.
- The Institute of Leadership & Management (TILM) to enable TILM to offer you student membership in relation to leadership and management. You can find out more about TILM at <http://www.institutelm.com>
- service providers contracted to us in connection with provision of learning, assessment, and training products and services such as markers, moderators, assessors, certification or credentialing providers, IT services and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We may also share personal data with law enforcement or other authorities if required by applicable law.

## How long will we 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 seven years following its termination or expiry, to ensure that 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.

## Your rights

Under the 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 with 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.

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## Right to erasure

You have the right to request the deletion of your personal data where, for example, it is no longer necessary for the purposes for which it was 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 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.

## Unsubscribing

You may unsubscribe from marketing communications at any time by contacting us at [info@academylm.co.uk](mailto:info@academylm.co.uk) or by using the 'unsubscribe' functionality on any marketing communication sent to you.

## Contact

If you have any queries about this Policy, the way in which The Academy of Leadership & Management processes personal data, or about exercising any of your rights, you can contact our Privacy Officer by sending an email to [info@academylm.co.uk](mailto:info@academylm.co.uk) or by writing to Privacy Officer, The Academy of Leadership & Management, 24, Sandyford Place, Glasgow G3 7NG. Our telephone number is 0845 890 2549.

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### Complaints

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.

### Changes to our Policy

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.