

PRIVACY POLICY

Towercourt Training Solutions Ltd

1. INTRODUCTION

Towercourt Training Solutions Ltd understands that your privacy is important to you and that you care about how your personal data is used.

Please read this Privacy Policy carefully and ensure that you understand it.

- 1.1 The website <https://www.towercourtraining.co.uk/> ("**Website**") is operated by Towercourt Training Solutions Ltd ("**we**" or "**us**").
- 1.2 We are committed to safeguarding the privacy of our website visitors, service users, individual customers and customer personnel.
- 1.3 Any personal data we collect will only be used as permitted by law.

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively 'the Data Protection Legislation') 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. Personal data covers obvious information such as your name and contact details, but also covers less obvious information such as identification numbers, electronic numbers, electronic location data, and other identifiers.

- 1.4 Please read this privacy policy (the "**Privacy Policy**") carefully and ensure that you understand it before using our Website.
- 1.5 By using our Website you accept The terms of this Privacy Policy. If you do not agree to this Privacy Policy, you must stop using our Website immediately.
- 1.6 This Privacy Policy applies where we are acting as a data controller and data processor with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.7 We use cookies on our Website. Insofar as those cookies are not strictly necessary for the provision of our Website and services, we will ask you to consent to our use of

cookies when you first visit our Website. You can find out more about how our Website uses cookies in our Cookie Policy, available here:
<https://www.towercourtraining.co.uk/privacy-data-cookie-policy/#cookies>.

- 1.8 Our Website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.
- 1.9 Our Website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing correspondences and limit the collection, sharing and publication of your personal data.

2. INFORMATION ABOUT US

- 2.1 Towercourt Training Solutions Ltd is a private limited company registered in England and Wales under registration number 10717571 and registered office at 8a Beechwood Centre Church Street, Woodlesford, Leeds, LS26 8RE, England.
- 2.2 Our principal place of business is at 8a Beechwood Centre Church Street, Woodlesford, Leeds, LS26 8RE, England.
- 2.3 You can contact us:
 - (a) by post, to the postal address given above;
 - (b) using our Website contact form;
 - (c) by telephone, on the contact number published on our Website; or
 - (d) by email, using the email address published on our Website.

- 2.4 Our Data Protection Officer's contact details are:

Name: Data Compliance Officer

Email: admin@towercourtraining.co.uk

3. DEFINITIONS AND INTERPRETATION

- 3.1 In this Privacy Policy, unless the context otherwise requires, the following expressions have the following meanings:

“Applicable Law” means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR, the Data Protection Act 2018 (and regulations made thereunder), and

the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation.

"we", "us" and "our" means Towercourt Training Solutions Ltd.

"you" means the person accessing and using our Website.

4. THE PERSONAL DATA THAT WE COLLECT

4.1 In this section, we have set out the categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.

(a) Communication data:

We may process data enabling us to get in touch with you ("**Communication Data**").

The Communication Data may include your name, email address, telephone number, postal address and/or social media account identifiers.

The source of the Communication Data is you and/or other third parties.

(b) User data:

We may process your website user account data ("**User Data**"). The User Data may include your account identifier, name, email address, business name, account creation and modification dates, website settings and marketing preferences. The primary source of the user data is you and/or other third parties, although some elements of the user data may be generated by our Website.

(c) Activity data:

We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our Website ("**Activity Data**"). The Activity Data may include your name, your contact details, your payment card details (or other payment details) and other transaction details. The source of the Activity Data is you and/or our payment services provider.

(d) Correspondence data:

We may process information contained in or relating to any communication that you send to us or that we send to you ("**Correspondence Data**"). The Correspondence Data may include the communication content and metadata

associated with the communication. Our Website will generate the metadata associated with communications made using the website contact forms.

(e) Usage data:

We may process data about your use of our website and services ("**Usage Data**"). The Usage Data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

5. PURPOSES OF PROCESSING AND LEGAL BASES

5.1 We have set out below, the purposes for which we may process personal data and the legal bases of the processing.

(a) Operations:

We may process your personal data for the purposes of operating our website, the processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control.

The legal bases for this processing are our legitimate interests, namely the proper administration of our Website, services and business; and/or the performance of a contract between you and us.

(b) Relationships and communications:

We may process correspondence data, user data, activity data and/or correspondence data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal bases for this processing are our legitimate interests, namely communications with our Website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our Website, services and business.

(c) Direct marketing:

We may process correspondence data, user data and/or activity data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal bases for this processing are consent; our legitimate

interests, namely promoting our business and communicating marketing messages and offers to our Website visitors and service users.

Research and analysis

We may process user data and/or activity data for the purposes of researching and analysing the use of our Website and services, as well as researching and analysing other interactions with our business. The legal bases for this processing are consent; and/or our legitimate interests, namely monitoring, supporting, improving and securing our Website, services and business generally.

(d) Record keeping:

We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this Privacy Policy.

(e) Legal claims:

We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Legal compliance and vital interests:

We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

6. SHARING YOUR PERSONAL DATA WITH OTHERS

6.1 We may share your personal data with a variety of the following categories of third parties as necessary:

- (a) Third parties to whom we outsource certain services such as, without limitation, IT systems or software providers, IT Support service providers, document and information storage providers.
- (b) Regulatory authorities and Awarding Organisations.
- (c) Third party service providers to assist us with client insight analytics, such as Google Analytics.

- (d) Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- (e) Government/Regulators/tax authorities/corporate registries.

6.2 Please note this list is non-exhaustive and there may be other examples where we need to share your personal data with other parties.

6.3 In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

7. SHARING INFORMATION OUTSIDE THE UK

7.1 Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with Applicable Law, making sure appropriate safeguards are in place.

7.2 Please contact us for more information.

7.3 You acknowledge that personal data that you submit for publication through our Website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

8. RETAINING AND DELETING PERSONAL DATA

8.1 This section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

8.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

8.3 Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

9. YOUR RIGHTS

9.1 Your principal rights under Applicable Law are:

- (a) Your right of access: You can ask for copies of your personal data.

- (b) Your right to rectification: You can ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- (c) Your right to erasure: You can ask us to erase your personal data in certain circumstances.
- (d) Your right to restriction of processing: You can ask us to restrict the processing of your personal data in certain circumstances.
- (e) Your right to object to processing: You can object to the processing of your personal data in certain circumstances.
- (f) Your right to data portability: You can ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- (g) Your right to complain to a supervisory authority: You can complain about our processing of your personal data.
- (h) Your right to withdraw consent: When we use consent as our lawful basis of our processing of your personal data you have the right to withdraw your consent.

9.2 These rights are subject to certain limitations and exceptions. You can learn more about your rights on the website of the Information Commissioner's Office (<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>).

9.3 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

Email address: admin@towercourtraining.co.uk

9.4 You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

9.5 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.

9.6 We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the contact details provided at 9.3.

10. AMENDMENTS

10.1 We may update this policy from time to time by publishing a new version on our Website.

10.2 As explained above, your use of our Website constitutes your acceptance of this Policy.

- 10.3 Consequently, any changes made to this Policy will apply to your use of our Website the first time you use it after the changes have been implemented.
- 10.4 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 10.5 We may notify you of significant changes to this policy by email.
- 10.6 If any part of the current version of this policy conflicts with any previous version(s), the current version shall prevail unless we explicitly state otherwise.

11. IMPLEMENTATION OF POLICY

- 11.1 This Policy shall be deemed effective as of 1st April 2025. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.