

Data Protection and Privacy Policy

Overview

This Policy sets out how HTFT Partnership and HTFT Partnership (CIMA) Ltd uses and protects any personal data received about users of the HTFT Partnership website or through other contact methods. Users are advised to read the Policy carefully, because by visiting or using the website or contracting with HTFT Partnership they agree to its terms. This Policy applies to the main website and to any other related sites under the control of HTFT Partnership.

HTFT Partnership is committed to ensuring that your privacy is protected. When we obtain certain information from you by which you can be identified then you can be assured that it will only be used in accordance with this privacy statement.

Personal Data

- HTFT Partnership will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.
- HTFT Partnership collects personal data when an online enquiry is submitted, on enrolment for HTFT Partnership Live or On-demand, or when a student enrolls or is enrolled by their employer on HTFT Partnership courses or when study materials or book computer-based examinations are ordered.
- To process your enquiries and orders, HTFT Partnership collects name, email and postal addresses, contact phone number, and, if applicable, company and type of business, and training manager's name and email address. Learners may be asked for their date of birth and professional body registration number as well as credit or debit card information for payment.

HTFT Partnership may use postal and email addresses to send information relating to a learner's studies or to make a learner aware of related goods and services provided by HTFT Partnership. We may also use personal information to communicate with the professional bodies regarding examination status. HTFT Partnership does not disclose personal details to any third party. If a learner does not wish HTFT Partnership to contact them by post or email then they can opt out by emailing or writing.

We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so.

Data Sharing

We may pass your personal data on to third-party service providers contracted to HTFT Partnership in the course of dealing with you.

To fulfil your booking, we will need to share your data with our cloud-based databases (our booking system, online learning platform, CRM system and supplier of study materials).

If your employer is paying for your courses, we will share your data, course attendance, course feedback and test results with your employer.

For results service procedures we will also share your data with the relevant institution (AAT, ACCA, CIMA and ICAEW).

When submitting course exams, we may also share your personal data with external markers.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with HTFT Partnership's procedures.

Security of Data

All personal details are held on a secure server so that all details are protected from unauthorised use, modification or disclosure. The padlock symbol in the web browser that means that industry-standard secure server software (SSL) is in place to encrypt any information that is sent. This ensures the safe processing of credit/debit card details when online orders are placed. HTFT Partnership does not currently store any financial details (debit/credit card numbers).

Retaining and Deleting Personal Data

We will retain and process your personal information for as long as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Data Retention Policy

We will retain and process your personal information for as long as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

In many cases the processing of data is necessary for the completion of business transactions entered into with customers, either students booking courses for themselves or training managers/employers booking courses on behalf of their staff.

We therefore believe:

- After a commercial transaction has occurred with an individual student, if a period of two years has elapsed with no further communication from a student, it can be assumed that they have qualified or that they are no longer studying and that communication should cease unless consent has been given.
- After a commercial transaction has occurred with a training manager/employer, if a period of three years has elapsed with no further communication, it can be assumed that they have no further interest in our services and that communication should cease unless consent has been given.

If there is no need to keep the personal data that long, then it will be disposed of securely before the time-limit concludes.

There are some exceptions to the two-year rule which have legislation determining the length of time for which personal data within that category should be retained.

Amendments

HTFT Partnership may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 5 January 2020.

Your rights

Under GDPR, EU data subjects are entitled to exercise the following rights:

Right of Access: Find out what kind of personal information is held about you and get a copy of this information.

Right of Rectification: Ask for your information to be updated or corrected.

Right to Data Portability: Receive a copy of the information which you have provided under contract so that you can provide that information to another organisation.

Right to Restrict Use: Ask for your personal information to stop being used in certain cases, including if you believe that the personal information about you is incorrect or the use is unlawful.

Right to Object: Objecting to use of your information (where a party is processing it on legitimate interest basis) and to have your personal information deleted.

Right to Erasure: In certain circumstances, you may also have your personal information deleted.

Data Subject Access Procedure

HTFT Partnership at your request, can confirm what information we hold about you and how it is processed. If HTFT Partnership does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of HTFT Partnership or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We use this information for statistical analysis purposes and then the data is removed from the system.

We also use cookies to serve our digital remarketing advert campaigns. Third-party vendors, such as Google, display our adverts on websites across the internet. By placing cookies on your device, these third-party vendors show you adverts based on your past visits and use of our site.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, we do not have any control over the third-party website and they would have their own privacy policies. Therefore, we would no longer be responsible for the protection and privacy of any information which you provide whilst visiting third party websites.

For any feedback or complaints on our privacy policy please contact complaints@htftpartnership.co.uk

As mentioned above, HTFT Partnership will only use information to send information relevant to a learner's studies. If a learner prefers not to receive such information they should write to The Data Controller at HTFT Partnership, 1st Floor, 12 The Pavilions, Cranmore Drive, Shirley, B90 4SB or email compliance@htftpartnership.co.uk

We provide opt-out options in all direct marketing emails.

Data Registration

HTFT Partnership has registered as a Data Controller with the United Kingdom Information Commissioner.