

2026

KMP 009A Privacy Notice



Policies and Procedures

Privacy Notice

Declaration

This Privacy Notice applies to individuals whose personal data we process including learners, apprentices, employers, staff, applicants and website users.

Group Horizon Ltd (“GHL”) is the data controller of your personal data and is subject to the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This Privacy Notice explains how we collect, use, store, share, and protect your personal data.

If you are asked to provide information to us, it will only be used in the ways described in this Notice.

This Privacy Notice should be read alongside the organisation’s **Data Protection Policy (KMP 009)**, which explains how Group Horizon Ltd protects personal data and manages data protection responsibilities.

1. Safeguarding

Where safeguarding risks are identified, we may share relevant information with appropriate agencies **in line with our statutory safeguarding duties**. We will only share what is necessary to protect an individual from harm.

2. What Type of Data Do We Collect?

We may collect, store and process the following categories of personal information:

- Name, postal address, telephone number, email address, emergency contact details
- Date of birth and gender
- Financial information (such as bank account or payment details)
- Unique candidate identifiers (e.g., ULN)
- Education and qualification history
- Employment details (e.g., role, employer, workplace contact details)
- Details of training you have undertaken or delivered
- Records of sickness or absence (where relevant)
- Information relating to learning needs, support needs or reasonable adjustments
- Technical information such as IP address, browser data, device information
- Website usage information (e.g., analytics data)
- Audio and video recordings of online sessions, learner reviews and meetings (where applicable)

3. How Do We Collect Your Personal Data?

We collect data in the following ways:

- **Directly from you**
 - For example, when you complete an enrolment form, communicate with us, submit documents, use our website, or participate in assessments.
- **Indirectly**
 - Such as when your employer, school, referral agency, or apprenticeship partner provides information to us on your behalf.
- **From publicly available sources**
 - For example, information available on professional profiles or social media, depending on your privacy settings.

Automatically via our website

We collect limited technical data such as:

- IP address
- browser type and version
- pages viewed and navigation paths
- device information

This supports security and service improvement.

Our website may use cookies or similar technologies to improve functionality, security and user experience. Further information may be provided in our website cookie notice.

4. How Do We Use Your Personal Data?

We may use your personal information to:

- Register you as a learner or candidate
- Deliver training, teaching, assessment and support
- Administer examinations, assessments, reviews, or appeals
- Issue certificates, results and progression information
- Communicate with awarding bodies, funding agencies and regulators
- Provide information, services or support you have requested
- Respond to enquiries and provide customer service
- Improve our services, website and learning resources
- Meet regulatory, audit or reporting requirements
- Support safeguarding duties
- Prevent fraud or misuse of services
- Establish or defend legal claims
- Notify you of changes to services or policies

- Recording sessions for quality assurance, training, safeguarding and compliance purposes

5. Lawful Basis for Processing

Group Horizon Ltd processes your personal data under the following lawful bases:

- **Contract**
 - To deliver the training, support, and assessment services you have enrolled for.
- **Legal obligation**
 - To meet statutory requirements set by bodies such as the **Education and Skills Funding Agency (ESFA)**, **Department for Education (DfE)**, **Ofsted**, awarding bodies, HMRC, and safeguarding authorities.
- **Legitimate interests**
 - For quality assurance, internal administration, monitoring, service improvement, compliance, safeguarding, and the effective delivery of our services.
- **Consent**
 - Where we send optional updates or marketing information. You may withdraw consent at any time.

In some circumstances we may process special category data (such as health information or learning support needs). This is processed where necessary for safeguarding, equality monitoring, supporting reasonable adjustments, or where required by law.

6. Automated Decision-Making

GHL does **not** use automated decision-making or profiling that produces legal or significant effects on individuals.

7. Who Do We Share Your Personal Data With?

We do not sell or rent personal data.

We may share your data with:

- Education and Skills Funding Agency (ESFA)
- Department for Education (DfE)
- Awarding bodies and apprenticeship assessment organisations
- The Learning Records Service (LRS)
- Regulatory authorities (including Ofsted, Ofqual, Qualifications Wales, CCEA)
- Local authorities where required
- Employers or prospective employers (e.g., qualification verification)

- Subcontractors and service providers who support training, assessment, IT or administration
- Professional advisers (legal, audit, quality assurance)
- Police or other agencies for the prevention or investigation of crime
- Organisations where we are legally obliged to provide information
- End Point Assessment Organisations (EPAOs) involved in apprenticeship assessment.

We may disclose data during business transfers or to protect legal rights, safety or security.

As an apprenticeship training provider, Group Horizon Ltd is required to share certain learner and employer data with government departments and agencies for funding, monitoring and statistical purposes. This includes the **Department for Education (DfE)** and the **Education and Skills Funding Agency (ESFA)**. Data is submitted through the **Individualised Learner Record (ILR)** in accordance with funding rules and regulatory requirements.

8. International Data Transfers

If your data is transferred or stored outside the UK, GHL ensures appropriate safeguards are in place, such as **UK-approved Standard Contractual Clauses (SCCs)**.

9. How Long We Keep Your Information

We retain personal data only for as long as necessary for statutory, contractual and regulatory purposes.

- Most personal data is retained for **six years after the end of the individual's relationship with Group Horizon Ltd**, in line with regulatory and funding requirements.
- Core learner data, qualification information and achievement records may be kept **indefinitely** for regulatory verification.

10. Your Rights

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure of your data
- Restrict how we process your data
- Object to certain types of processing
- Request data portability
- Withdraw consent at any time (where consent was used)
- Complain to the Information Commissioner's Office

Requests for access to personal data (Subject Access Requests) are managed in line with our Subject Access Request Procedure (KMP 009B).

ICO Contact Details

Website: <https://www.ico.org.uk>

Telephone: 0303 123 1113

Address: Information Commissioner's Office,
Wycliffe House, Water Lane, Wilmslow, Cheshire, **SK9 5AF**

11. Contact Us

If you are dissatisfied with how Group Horizon Ltd has handled your personal data, you may submit a data protection complaint to the Data Protection Lead using the organisation's complaints procedure. We encourage individuals to contact us first so that we have the opportunity to investigate and resolve concerns before they are referred to the ICO.

Data Protection Lead

Email: communications@grouphorizon.co.uk

Telephone: 0191 497 7722

Post: Group Horizon Ltd
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Eleventh Avenue North
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