



## Privacy, GDPR & Cookie Policy

Document Specification:	
Purpose:	This document sets out Gatehouse Awards' approach to ensuring the Privacy of individuals and the use of Cookies on its websites, etc., in line with the GDPR.
Accountability:	Gatehouse Awards Governing Body
Responsibility:	Responsible Officer
Version:	2.0
Effective from:	June 2020
Indicative Review date:	June 2022
Links to Ofqual GCR	A1, A5
Other relevant documents:	Policy & Electronic Communications Regulations (amended 2016) General Data Protection Regulations Data Protection Bill 2018 GA Comments, Compliments and Complaints Policy & Procedure GA Terms and Conditions of Business

### Gatehouse Awards Limited

64 Daisy Hill  
Dewsbury  
WF13 1LJ  
UNITED KINGDOM

Tel: +44 (0)1924 609250

[www.gatehouseawards.org](http://www.gatehouseawards.org)  
[info@gatehouseawards.org](mailto:info@gatehouseawards.org)

### 1. Overview

This Policy covers the data collected and processed by **Gatehouse Awards Limited**, who can be contacted at:

Gatehouse Awards Limited  
64 Daisy Hill  
Dewsbury  
WF13 1LJ

Email: [info@gatehouseawards.org](mailto:info@gatehouseawards.org)  
Tel: 01924 609250

Gatehouse Awards (GA) is the Data Controller of the personal data we process on our own behalf and the Data Processor of data processed on behalf of our centres, partners and candidates. We have a legal duty to protect the privacy of all, personal and business data obtained from you while you are using our websites, as well as in the provision of our services to you. This Privacy Policy explains what information we may collect from you and the purposes for which it will be used. This Policy complies with all current data protection and privacy regulations in the UK, including, but not limited to, the General Data Protection Regulations (the GDPR) and the Privacy and Electronic Communications Regulations (the PECR).

The GDPR relates to 'personal data' which covers any information which makes an individual (the Data Subject) identifiable.

### 2. Purpose of and Legal Basis for Processing Personal Data

GA will only process personal data for the purposes of delivering the services contracted by our centres, partners and candidates, unless we are provided with specific consent to process for other purposes, such as marketing, or the purpose of complying with local laws or regulations. Personal data will never be processed without the knowledge and/or permission of the Data Subject.

GA is recognised by The Office for Qualifications and Examinations in England (Ofqual) - <https://www.gov.uk/government/organisations/ofqual/about>, the Government Regulatory Body, for the purposes of providing Regulated qualifications.

Regulatory Bodies are given their powers by Acts of Parliament, meaning that the regulations they enforce are backed by UK Law. GA therefore has a Legal Obligation to process certain Personal Data necessary to ensure compliance with those regulations. Links to the relevant website page of the Regulator have been provided above where you can find all of the information on the role of the Regulator and the legislation under which they gain their powers.

By using our services, including accessing our websites and forms, etc. therein, you give your agreement to our processing any personal data we may have as described in this policy.

### 3. Types of Personal Data Processed

Personal Data is any information which could potentially make an individual identifiable and can include, but may not be limited to, your name, address, date of birth, email address and IP address.

We collect data in a number of ways including, but not necessarily limited to:

- As part of a Contract for Services, i.e. names and contact information of individuals, including where they are acting on behalf of a centre or partner organisation
- Provided to us by Centres in order that we can provide the regulated qualifications required by candidates
- Other forms of contact direct from candidates such as for replacement certificates, complaints, enquiries and appeals

Personal Data provided to us by centres, partners or candidates as part of our service provision will be processed only in accordance with the provision of those services and no such data will be used for the benefit of GA.

### 4. Our Websites and Cookies

#### 4.1. Who manages our websites?

The content of our websites is owned and edited by Gatehouse Awards Ltd.

#### 4.2. Website usage information

No information is gathered on visitors to our websites, unless it is a registered user who also logs into a secure section of the website, for example Ark accounts or to access sample materials or live assessment materials where these require a log-in. Where you are a registered user of one of our websites and have logged in, we may collect web usage information to enable us to build a demographic profile or to improve the services you have requested from us.

#### 4.3. Cookies

Cookies are small pieces of data given to your browser by a website which may be stored as text files in the cookie directory of your computer. Cookies are not programs and cannot collect information from or damage your computer. Their primary purpose is to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. You can prevent cookies from being stored, however this may downgrade or 'break' certain elements of the GA websites' functionality.

#### 4.4. Further information about GA's use of cookies: how we use cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to a site. It is recommended that you leave on all cookies if

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you are not sure whether you need them or not in case they are used to provide a service that you use.

### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of websites. Therefore it is recommended that you do not disable cookies.

### The Cookies GA Sets

- Account related cookies

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out; however in some cases they may remain afterwards to remember your site preferences when logged out.

- Login related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

### Third Party Cookies

In some special cases we may also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through our sites:

- Currently no third party cookies used on GA sites.

## 4.5. Third party content and linking to other websites

This privacy policy applies only to our websites. We are not responsible for privacy practices within any other websites. You should always be aware of this when you leave a GA website and we encourage you to read the privacy statement on any other website that you visit. We may embed external content from third-party websites such as YouTube, Twitter and LinkedIn including cookies. This content is not published on our website. It is delivered using devices and services from third party sites that can be inserted into our site such as media players, RSS feeds and widgets. These websites may use cookies. Their content is subject to the privacy policy of the relevant third-party provider and not ours.

## 5. Information sharing and disclosure

We may share your data with specified third parties for the purposes of supplying the services you have contracted us for or if required to by law or by a regulation based on a law, as outlined in section 2 above. We will not sell, rent or disclose your information to any third parties other than those set out in this privacy policy without your prior consent.

We do not transfer your personal data outside of the UK and the European Economic Area.

### 6. Retention of Data

Personal Data will always be held for the minimum amount of time required. This will depend on a number of factors, such as the terms and length of a contract or a relevant law or regulation based on law; for instance:

- centre details – held for a minimum of 6 years after the Centre has ceased to be approved
- candidate details – held indefinitely for the purposes of being able to provide confirmation of a qualification at any time in the future, as required under Ofqual regulation

If you have made an enquiry and have opted in to receiving marketing information, you will continue to receive such communications until you opt out. A reminder of your option to unsubscribe is provided with every communication issued. Once you have opted out, if you do not otherwise fall into the above categories, your data will be deleted 12 months from the date of the opt out.

Personal Data that has been gathered via email, written or telephone enquiries which have not led to further request for services or opted in to marketing, etc. will be held for a maximum of 12 months after the initial contact, unless additional permission is obtained from the Data Subject or a contract for services is brought into force in the interim.

Electronic Personal Data is encrypted and held in a secure manner on our physical and cloud-based servers. The encryption used meets all current requirements for encrypted services and is updated regularly to ensure that it remains fit for purpose. Electronic data is deleted following a secure process to ensure there is no lapse in security at the point of deletion.

Paper based Personal Data is held in secure cabinets. It is destroyed using a secure data destruction procedure.

### 7. Your Rights

Under current legislation, Data Subjects have the following rights:

- **To be informed** – This policy is one of ways in which GA informs you how and why we process your data.
- **Of access** – All Data Subjects have the right to request access to all of the data we hold on them. Any Data Subject requests received will be reviewed and responded to within one calendar month of receipt of the request. Most requests will be fulfilled free of charge, however, GA reserve the right to charge a reasonable administration fee for any requests deemed to be excessive, unfounded or repetitive.
- **Of rectification** – Should you find that any data we hold about you is incorrect, you can ask us to correct it and we will investigate and respond within one calendar month of receipt of the request.
- **Of erasure** – You can ask for your Personal Data to be erased permanently. All such requests will be responded to within one calendar month of the receipt of a request. Please note that, whilst we will always endeavour to fulfil requests, there may be some instances when this is not possible due to legal or regulatory reasons. We will always provide a full explanation in any such instances.

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- **To restrict processing** – If you do not wish for your data to be erased, you may ask for it to be restricted so that we continue to hold it but not process it or use it in any way – we would essentially ‘archive’ your data. This is only applicable in certain circumstances; however we will look at all requests and respond within one calendar month of the receipt of a request.
- **To data portability** – All electronically held data can be transferred to another company in a structured, commonly used and machine readable format on request. Please note that this will only include the data you have provided to us and not any ancillary data produced as a result of the services we have created during the provision of our services or where that data includes information regarding a third party. All requests for moving data will be responded to within one calendar month of a request being received.
- **To object** – You can object to our processing data for the purposes of marketing, scientific/historical research and statistics, or legitimate interests or in the performing of a task in the public interest /exercise of official authority (including profiling). All such requests shall be responded to within one calendar month
- **Rights related to automated decision making, including profiling** – The GDPR sets out specific rights in relation to automated decision making. Please note that GA does not use any form of automated decision making system whilst processing your data.
- **To complain** – You have the right to raise a complaint regarding the processing of your data or our response to a request under the above rights. As part of this, you also have the right to escalate your complaint to a supervisory authority. In respect of data handling, you have the right to escalate your complaint to the Information Commissioners Office (ICO). Please go to <https://ico.org.uk/for-the-public/raising-concerns/> for full details.

Data Subjects have the right to withdraw their consent to our processing their data at any time.

In respect of any of the rights indicated above, if you would like to make a request, require further information, or have a complaint regarding our processing of your data please contact us at:

Address: Gatehouse Awards Limited  
64 Daisy Hill  
Dewsbury  
WF13 1LJ

Email: [info@GatehouseAwards.org](mailto:info@GatehouseAwards.org)  
Telephone: 01924 609250

Website: <http://www.gatehouseawards.org/>

## 8. Changes to this policy

We may make changes to this policy at any time. Changes will be posted on our website and are effective immediately, except where they relate directly to a contract for services where all changes will be subject to the agreements in that contract. Regularly reviewing this Policy ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.