

Marketing Privacy Statement

The wording in this document reflects the requirements of the General Data Protection Regulations (GDPR) which will come into effect in the UK on 25 May 2018.

This Privacy Notice tells you what to expect in relation to personal information about you which is collected, handled and processed by the National College for High Speed Rail.

Data Controller

The National College for High Speed Rail, 2 Lister Street, Birmingham, B7 4AG is the Data Controller.

Data Protection Officer

Sally Brook Shanahan

dataprotectionofficer@nchsr.ac.uk

We acknowledge and agree that any personal data of yours that we handle will be processed in accordance with all applicable data protection laws. With effect from 25 May 2018, the General Data Protection Regulations (“GDPR”) will come into force.

How we safeguard your information

We take care to protect the information we hold about you. For more information about this please refer to our data protection policy.

Type of Personal Data Being Processed

For marketing purposes, we collect:

- Name
- Address
- Email Address
- Job Title (if appropriate)
- Telephone Number
- Business Name (if appropriate)
- IP Address
- Demographic information, such as town or postcode
- Date of Birth – if appropriate
- Former school information/ year group (if appropriate)
- Subjects of interest (if appropriate)
- How you heard about us

Where indicated some of the information is optional and you can choose not to complete.

How personal data is collected for marketing purposes

Personal data is obtained from one or more of the following:

- Visits and use of the NCHSR website and visits to the college
- Event registrations through tools such as Eventbrite
- Use of NCHSR's social media
- If you mention us on social media, eg Twitter, we will collect your Twitter handle
- Use of Google Analytics
- Attendees of corporate seminars and webinars hosted by NCHSR
- Subscribers to the NCHSR newsletter updates
- Requests for information about products and services offered by NCHSR (including quotes)
- We automatically collect some technical information from these devices and web browsers. This might include IP (internet protocol) address, device ID, app ID or vendor ID

Why we collect personal data for marketing purposes

Personal data is collected to provide legitimate business services which include:

- For us to review and reply to your enquiry
- To improve our marketing, our services and our product offering

How personal data is used in marketing

Personal data may be used to:

- Process enquiries appropriately
- We may use third parties to carry out certain activities, such as processing and sorting data, monitoring how customers use our site and issuing our emails for us
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Send you communications which you have requested and that may be of interest to you. These may include information about product updates, newsletters, events, webinars
- To inform you of various promotions, goods and services that may be of interest to you. You may be contacted by post, email, telephone, SMS or such other means with carefully selected marketing communications we deem relevant to send to you in the legitimate interests of NCHSR as an education provider. Each marketing communication sent to you will provide the option to unsubscribe and manage your data profile and communication preferences from NCHSR at any time
- Create a profile of your interests and preferences so that we can contact you with information relevant to you
- We may make use of additional information about you when it is available from external sources to help us do this effectively

The legal basis on which we collect and use your personal information

Where you have previously studied at the College or commenced an application process with us before, then we will send you information about the courses we provide on the basis of our legitimate business interests. In doing so, we will comply with the

requirements of the “soft opt in” and offer you an opportunity to refuse marketing when your details are first collected and in subsequent messages (by way of own unsubscribe).

Any other marketing we carry out will be on the basis of consent.

Who has access to this data?

Only NCHSR employees are granted access to customer information. This is ensured through the use of strict operational processes and procedures.

Staff are trained on security systems and relevant processes and procedures which are reviewed regularly for ongoing effectiveness and suitability for purpose. All employees are kept up-to-date on NCHSR privacy practices.

Employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure that customer information is protected.

We will not sell or rent your information to third parties.

Third-party service providers working on our behalf:

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure.

How long we keep your personal information

We review our retention periods for personal data on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold personal data on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

How we share your personal information

We may share the personal information that you give us with the following organisations (or types of organisation) for the following purposes.

Organisation / type of organisation:

- Auditors
- Funders
- Employer groups

Purpose:

- To assess effectiveness/ impact/ reach of marketing activity

We may also share your personal information with third parties who provide services to the College.

Organisation / type of organisation:

- Marketing agency
- Web developer

Purpose:

- To issue marketing communications on behalf of NCHSR

How we transfer your personal information outside Europe:

We do not store or transfer your personal data outside Europe.

Links to other websites/from other websites

The College website may contain links to other websites run by other organisations. This Privacy Policy only applies to the College website and you are encouraged to read the Privacy Statements on the third party websites that you visit such as Google. NCHSR is not responsible for the Privacy Policies and practices of other websites even if they were accessed via the NCHSR website. Equally, if you link to a NCHSR website from a third-party site, NCHSR is not responsible for the Privacy Policies and practices of that third-party site.

13 or under

If you are aged 13 or under, we need to get your parent's/carer's permission beforehand whenever you provide us with personal information.

Cookies

What are cookies?

A cookie is a text file containing small amounts of information which a server downloads to your personal computer (PC) or mobile device when you visit a website. The server then sends a cookie back to the originating website each time you subsequently visit it, or if you visit another website which recognises that cookie.

Why do websites use cookies?

Web pages have no memory. If you are surfing from page to page within a website, you will not be recognised as the same user across pages. Cookies enable your browser to be recognised by the website. So, cookies are mainly used to remember the choices you have made – choices such as the language you prefer and the currency you use. They will also make sure you are recognised when you return to a website.

Do all cookies do the same thing?

No, there are different types of cookies and different ways of using them. Cookies can be categorised according to their function, their lifespan and according to who places them on a website.

How does NCHSR use cookies?

Our website uses the following types of cookie:

Technical cookies: We try to give our visitors an advanced and user-friendly website that adapts automatically to their needs and wishes. To achieve this, we use technical cookies to show you our website, to make it function correctly. These technical cookies are absolutely necessary for our website to function properly.

Functional cookies: We also use functional cookies to remember your preferences and to help you to use our website efficiently and effectively, for example by remembering your preferred currency and language that you viewed earlier.

These functional cookies are not strictly necessary for the functioning of our website, but they add functionality for you and enhance your experience.

Analytics cookies: We use these cookies to gain insight into how our visitors use the website, to find out what works and what doesn't, to optimise and improve our website and to ensure we continue to be interesting and relevant. The data we gather includes which web pages you have viewed, which referring/exit pages you have entered and left from, which platform type you have used, date and time stamp information and details such as the number of clicks you make on a given page, your mouse movements and scrolling activity, the search words you use and the text you type while using our website. We also make use of analytics cookies as part of our online advertising campaigns to learn how users interact with our website after they have been shown an online advertisement, which may include advertisements on third-party websites. We will not know who you are, and only obtain anonymous data.

Commercial cookies: We use these to show you our adverts on other websites. This is called "remarketing" and it aims to be based on your browsing activities on our website, such as the destinations you have been searching for, the products you have viewed and the prices you have been shown.

How long do NCHSR cookies stay active?

The cookies we use have varying lifespans. The maximum lifespan we set on some of them is five years from your last visit to our website. You can erase all cookies from your browser any time you want to.

How can you recognise NCHSR cookies?

You can find our cookies in your browser settings.

Does NCHSR use third-party cookies?

Yes, NCHSR uses the services of trusted and recognised online advertising and marketing companies. NCHSR may also use third-party providers for analytical purposes. To enable their services, these companies need to place cookies.

The providers we use are committed to building consumer awareness and establishing responsible business and data management practices and standards.

In order to control the collection of data for analytical purposes by Google Analytics, you may want to visit the following link: <https://tools.google.com/dlpage/gaoptout>

Use of re-targeting functions on the website

Activation of interest-related advertising using “re-marketing”. The NCHSR website may use re-marketing tags on its website.

How can you manage your cookie preferences?

Using your browser settings in, for example, Internet Explorer, Safari, Firefox or Chrome, you can set which cookies to accept and which to reject. Where you find these settings depends on which browser you use. Use the “Help” function in your browser to locate the settings you need.

If you choose not to accept certain cookies, you may not be able to use some functions on our website. And opting out of an online advertising network does not mean that you will no longer receive or be subject to online advertising or marketing analysis. It means that the network from which you opted out will no longer deliver ads tailored to your web preferences and browsing patterns.

Your rights over your personal information

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner’s Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO’s website for further information about this (<https://ico.org.uk/>)
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information
- the right to ask us to correct any errors in your personal information
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information
- right, in certain circumstances, to ask us to review and explain our legitimate interests to you
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

Changes to our privacy policy

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be notified to you by email.