



Document title:	Privacy and Cookies Policy
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Policy Status	Approved
Date of Issue	January 2021
Date of revision	November 2023
Reason for revision	Updating to mention use of the Snitcher app to collect data of businesses visiting our website. Editing the following parts of this policy: <ul style="list-style-type: none"> • How do we collect your data? • How do we use cookies? • What types of cookies do we use?
Date to be revised	November 2024
This policy was adopted by:	 Amy Ray
This policy was approved by:	 Anna Smith

High Ridge Training Group Ltd (registered company number 13579432) abide by this privacy and cookies policy as we respect the privacy of all who interact with us and our companies. We are group of specialist registered training providers who combine and share best practice, management and admin/operational resources to support our specialist and industry specific tutors and programme leads. Our companies are:

- Reach4Skills Training (and subsidiary company Reach4Crafts)
- Cedars Training Academy
- Cedars Health and Beauty Centre/Cedars Salons
- Valkyrie Support Services
- High Ridge Management Services

The personal information that we collect about you is used only to provide appropriate learning and training, maintain our service to you, and communicate with you effectively.

We are compliant with the General Data Protection Regulation (GDPR) effective from May 2018. Our legal basis for processing your personal information is so that we can fulfil our contract with you.

The term “processing” covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making

available, alignment or combination, restriction, erasure, or destruction of personal data.

The General Data Protection Regulation (GDPR) applies to the processing of personal data wholly or partly by automated means as well as to non-automated processing if it is part of a structured filing system. [source: [European Commission website](#)].

What data do we collect?

We collect the following data:

- Personal identification information:
 - Name & any previous names (including maiden names)
 - Address
 - Telephone/Mobile Number(s)
 - Date of Birth
 - National Insurance Number
 - Legal identification information (passport/driving license number, birth certificate)
 - Unique learner number
- Next of Kin name & telephone number
- Employment status & history, including the name of your employer and manager if required.
- Qualification details/records
- Payment details (bank, debit/credit card, PayPal)
- Ethnicity
- Disability/learning difficulty information and any related medical information
- Household declaration information
- Referee details
- Driving license endorsements (if applying for a role with our companies)
- Evidence to prove your right to work in the UK
- Details of reasonable adjustments (if required)
- Disclosure of criminal convictions
- Anonymous web tracking information via cookies & tracking pixels:
 - Web traffic data
 - Location data
 - IP Address
 - Demographic data
 - Interaction with Facebook and Instagram advertisements
 - Interaction with adverts on the Google Search Network
 - Data on the device being used to visit our website and interact with our social media platforms

How do we collect your data?

You directly supply most of the data collected by High Ridge Training Group Ltd. This data is collected in the following ways:

- Completing an application form for an accredited training course or Apprenticeship.

- Completing a lead form via a Facebook or Instagram advert.
- Completing a Mailing List sign up form on one of our websites.
- Completing an enquiry form on one of our websites.
- Send an email to one of our company email addresses or emailing a member of our teams.
- Enquiries made by private messaging on social media (Facebook Messenger, Instagram Direct messaging, Twitter messaging)
- Completing a booking for a course or workshop on www.reach4crafts.uk.
- Placing an order on www.reach4crafts.uk.
- Booking a treatment on <https://cedarshealthandbeauty.book.app/>
- Booking a course on <https://cedarstrainingacademy.co.uk>
- Using web browsing cookies.
- Using the Meta Pixel (Facebook and Instagram).
- Using Google Tags.

High Ridge Training Group Ltd may also receive your data indirectly from the following sources:

- Publicly available business data that can be found via web search.
- Previous qualification information via the Learner Records Service.
- Information passed over from other providers that our companies subcontract with. These are M.I.T. for Cedars Training Academy Gloucester (IBHA) and ATL for Valkyrie Support Services.
 - [Click here](#) to read M.I.T.'s privacy policy.
 - [Click here](#) to read ATL's privacy policy.
- Company information collected via the Snitcher Tracking App. We use Snitcher to measure the business usage of our website. This service shows us the company names and addresses based on the IP addresses of our visitors. For Snitcher to distinguish between different visitors on our website, it sets a cookie named 'SNID' with a lifetime of two years. We use this for Reach4Skills, Valkyrie Support Services and Cedars Training Academy. [Click here](#) to read how Snitcher complies with GDPR.

How will we use your data?

High Ridge Training Group Ltd collects your data so that we can:

- Enrol you onto your chosen training course (apprenticeship or accredited training).
- Book you in for a treatment at Cedars Health and Beauty Centre or Cedars Training Academy Derby.
- Claim any government allocated funding so we can offer you training at a reduced/no cost to yourself.
- Answer any enquiries you may have regarding the training and services we offer and to send over relevant information that you request.
- To process payment for courses, workshops and products (Cedars Training Academy, Reach4Crafts).
- To request payment via PayPal for private courses (Valkyrie Support Services).
- To send across important company updates.
- To send across information on the services we offer.

- To send you promotional content and newsletters relating to one of our business areas via MailChimp (this will only be done if you have opted into our marketing for Reach4Skills, Reach4Crafts, Valkyrie Support Services or Cedars Training Academy).
- To send you promotional content via Ovatu (Cedars Health and Beauty Centre clients).
- To send booking reminders via Ovatu (Cedars Health and Beauty Centre clients).
- To send across any physical products or course/workshop materials.
- To analyse the user experience(s) of our websites.
- To analyse the user experience(s) of our Facebook and Instagram adverts so we can better tailor our advertising.

Who Do We Share Your Data With?

High Ridge Training Group shares learner information with the Department for Education (DfE), who collect personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our learners with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#).

If you are an apprentice, we will routinely share your personal details with your employer. This is to enable us to provide the best possible service and support your learning.

We will share your information with exam boards and awarding bodies to verify your results and claim your certification.

For Reach4Skills (including Reach4Crafts), Valkyrie Support Services and Cedars Training Academy- If you choose to opt into our marketing, we will upload your contact details to MailChimp CRM, which we use for email marketing.

For clients at Cedars Health and Beauty Centre- We hold the information you give when booking with us on the Ovatu booking platform.

For learners at Valkyrie Support Services Ltd.- We will upload your information onto the Yeti LMS platform, which is used to keep a record of our learners and employers for enrolment purposes.

Outside of these organisations, we will not share your data with any other third party unless we:

- have a safeguarding concern.
- are required to by government bodies or law enforcement agencies.
- engage a supplier to process data on our behalf.
- have obtained your prior permission.

How do we store your data?

High Ridge Training Group Ltd stores your personal information securely on our Management Information System, which is only accessible to employees within the High Ridge Training Group.

As providers who deliver training through the Skills Funding Agency and European Social Fund, we are obligated to adhere to their retention schedule for the following documents:

- Recruitment Checklist
- Application Form
- Eligibility Form
- Right to Work in the UK Form
- Training Agreement
- Individual Learning Plan
- Learner's Awarding Body registration number
- Visit reports/ Assessment Plans – capturing learning activity and learner progress on an ongoing basis
- Formal progress Reviews – capturing learning activity, learner progress and employer involvement (carried out a minimum of once every 12 weeks)
- Authenticated copy of certificate of achievement (including Apprenticeship Framework Certificate)
- Written confirmation and supporting evidence of withdrawal from or leaving the programme giving reason for exiting programme, signed by Contractor representative
- Proof of contact hours signed by learner and Contractor representative
- Learner and employer exit survey (as provided by the training provider)
- Proof of final advice and guidance
- Any other requirements laid down by ESFA from time to time and requested of the Contractor by the training provider.

The retention schedules are as follows:

- 2007 to 2013 ESF programme- documents to be retained until at least until 31 December 2022
- 2014 to 2020 Programme- documents to be retained until at least until 31 December 2029
- 2021 to 2027 Programme- documents to be retained until at least until 31 December 2035

This retention schedule will be confirmed once the Operational Programme has been approved, meaning that documents must be retained until the end of 2035 at the earliest.

Marketing

High Ridge Training Group Ltd likes to send promotional content via email and text message.

We use MailChimp to send promotional email campaigns about offers and updates to those who opt into our email marketing for Reach4Skills (including Reach4Crafts), Valkyrie Support Services and Cedars Training Academy. This is done via Facebook lead forms, newsletter/ mailing list sign up forms on our website(s) and is also given as an option when booking a course or making a purchase through www.reach4crafts.uk.

If you have registered your interest for an accredited course via Facebook or Instagram and provided a mobile telephone number, we will use this to send text reminders about any upcoming funding/enrolment deadlines relating to the course(s) you have registered your interest for.

Occasionally we send emails to local businesses using publicly available contact information to raise awareness of our services and how the courses we offer can benefit their staff. This data will not be processed through MailChimp but will be sent directly from the email address of the member of staff conducting the outreach.

You have the right at any time to stop us from sending you marketing material. You can opt out of marketing via the following:

- If you are subscribed to one of our MailChimp lists, there is a link to unsubscribe and/or update your preferences at the bottom of every email sent.
- You can reply to any emails you receive from us asking for us to cease marketing communication.
- Email our Senior Digital Marketing Executive via amy.ray@highridgetraining.co.uk asking to opt out and/or update your marketing permissions.

What are your data protection rights?

High Ridge Training Group Ltd would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request High Ridge Training Group Ltd for copies of your personal data.
- **The right to rectification** – You have the right to request that High Ridge Training Group Ltd correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that High Ridge Training Group Ltd erase your personal data, under certain conditions. Please note that we have a statutory duty to retain some types of data for 7 years, so not everything will be erased immediately. Please also note that we will not be able to continue to engage with you if we do not have sufficient information.
- **The right to restrict processing** – You have the right to request that High Ridge Training Group Ltd restrict the processing of your personal data.
- **The right to object to processing** – You have the right to object to High Ridge Training Group Ltd's processing of your personal data.

- **The right to data portability** – You have the right to request that High Ridge Training Group Ltd transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us via:

- **Email:** hello@highridgetraining.co.uk
- **Telephone:** 0330 236 9118
- **Or write to us:** High Ridge Training Group Ltd, Gatcombe House, Copnor Road, Portsmouth, Hampshire, PO3 5EJ

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we collect information from you automatically through cookies or similar technology.

For further information, visit <https://ico.org.uk/your-data-matters/online/cookies/>.

How do we use cookies?

High Ridge Training Group Ltd uses cookies in a range of ways to improve your experience on our websites, including:

- To gather anonymous visitor information on our websites (individual users, page views, demographics, location, device, and browser use) and to use this data for analytics purposes.
- To gather anonymous visitor information and to use for remarketing purposes (e.g; Custom Facebook Audiences).
- To gather visitor information via the Snitcher App to find legitimate interest leads.
- To improve functionality of our websites and their features.
- To monitor commercial activity on www.reach4crafts.uk (add to cart, checkout).

What types of cookies do we use?

High Ridge Training Group Ltd use cookies from Squarespace & Google. Here are descriptions of the types of cookies than we use on our websites:

- **Functionality** – High Ridge Training Group Ltd uses these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – High Ridge Training Group Ltd uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. High Ridge Training Group Ltd sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also

share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

- Facebook Pixel- High Ridge Training Group Ltd uses this tool in our Facebook and Instagram advertising to help with tracking website visitors linked to our advertising campaigns and to retarget our adverts from the information gathered. To find out how to adjust your Facebook advertising settings please click [here](#).
- Google Tags- High Ridge Training Group Ltd uses this tool in our Google Search marketing and analytics to track website visitors. This allows us to monitor the results of our paid Google Search Campaigns as well as tracking the activity of users on our website. With the Google Tag we keep track of the following actions: web page views, contact form submissions and phone calls as a result of Google advertising. We are also able to see demographics (age, gender, location), time spent on website pages & search categories of our website visitors.
- We use Snitcher to measure the business usage of our website. This service shows us the company names and addresses based on the IP addresses of our visitors. For Snitcher to distinguish between different visitors on our website, it sets a cookie named 'SNID' with a lifetime of two years.

We previously also used cookies from Wordpress and Create.net.

How to manage cookies

You can set your browser not to accept cookies, and <https://ico.org.uk/your-data-matters/online/cookies/> tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

This privacy policy applies only to the following websites:

- www.reach4skills.co.uk
- www.reach4crafts.uk
- <https://www.cedarstrainingacademy.co.uk/>
- <https://www.cedarshealth-beauty.co.uk/>
- <https://www.valkyrietraining.co.uk/>
- <https://www.highridgetraining.co.uk/>

Any websites linked to from our websites are subject to their own privacy policy.

Changes to our privacy policy

High Ridge Training Group Ltd keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 9th November 2023.

How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

- **Email:** hello@highridgetraining.co.uk
- **Telephone:** 0330 236 9118
- **Or write to us:** High Ridge Training Group Ltd, Gatcombe House, Copnor Road, Portsmouth, Hampshire, PO3 5EJ

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that High Ridge Training Group Ltd has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office via <https://ico.org.uk/make-a-complaint/>.

This policy works in accordance with the following High Ridge Training Group policies:

- Document Retention Policy
- Document Disposal Policy
- Data Protection and Confidentiality Policy