

## PRIVACY POLICY

White Horse is a training organisation owned by a consortium of Chartered Accountants. We provide Continual Professional Development and Practical Training Courses exclusively for accountants and we also deliver the qualifications of the Association of Accounting Technicians. Where appropriate we offer these qualifications as part of an Apprenticeship and we receive funding from the government for this.

This privacy policy is designed to provide as much information as possible for those to whom we provide these services. We are committed to ensuring that your privacy is protected in accordance with all data protection regulations and any personally identifying information provided to us will only be used as outlined in this privacy statement. Links to the privacy notices of all organisations who control or process data on behalf of White Horse are provided at the end of this policy.

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so. If you attend our courses we may use your personal information to send you promotional information about our services as we would view this as being of interest to you. We will also send you promotional information about our services if you request us to do so.

### DATA WE COLLECT

For the purposes of this policy Personal Data means any and all data that relates to an individual who can be identified from data that is gathered by us in order to provide our business services. These services are detailed on our website and referred to in this policy.

- White Horse collects data for those attending CPD courses and for those studying for the AAT qualification or an Accountancy Apprenticeship with us.
- For those attending our courses, or who have made bookings on behalf of others, we collect and store contact data. In this instance, we do not collect any personal data other than a work email address and a postal address if required for invoicing purposes. We collect this data in order to ensure that we can carry out our advertised service efficiently and we store the data to facilitate bookings and to inform individuals and firms of future courses, which we believe will be of legitimate interest to them.
- We collect personal data from students who enrol on our AAT and Apprenticeship courses. For students who are not Apprentices this includes personal contact data and some personal information to facilitate registration with the AAT and to fulfil our contractual obligations. Once registered with the AAT, the latter will process your personal information and we have access to this information.
- Those funded under an apprenticeship contract must agree to provide a variety of personal data as contractually required by the Education and Skills Funding Agency (ESFA). Full details can be found on the ESFA website or by enquiry to White Horse.
- Personal data is also collected from all students to facilitate teaching and evidence collection via HowtoMoodle and OneFile which are cloud-based applications which provide services to White Horse.

## WHAT WE DO WITH YOUR DATA

- For those attending or booking our courses, we retain your contact data in order to ensure that bookings are carried out and that attendance records can be maintained and, where appropriate, invoices can be sent. We also use this data to keep you informed of future courses on the basis of your interest in them. Data may be held in electronic or paper form or in both.
- For all students your data is kept in order to be able to communicate with you and your employer, if appropriate, and in accordance with the requirements of the AAT. This is part of our contractual arrangements with you to enable us to deliver the AAT qualification.
- Student data and employer contact data may be stored and processed by OneFile and/or HowtoMoodle to facilitate online learning opportunities and evidence collection
- For Apprentices funding is received from the ESFA via a sub-contract arrangement with the South West Association of Training Providers (SWATPro) and the data is updated and processed by both White Horse and SWATPro on a monthly basis to confirm learning, employment and completion as required by this contract. This is done through a PICS database managed by Pellcomp Ltd who are also processors of the information.
- Apprentices should be aware of the full ESFA privacy policy and there is a link to this below. Apprentices will also be given a paper copy of this, as required by the ESFA, on enrolment. Apprentices will also be asked to consent to the use of the Learner Record Service (LRS) which provides details on previous qualifications as well as a Unique Learner Number. A paper copy of their privacy notice will also be provided.
- We do not use your personal information for profiling or automated decision making.
- Links to the privacy policies of relevant organisations may be found below.

## WEBSITE

- The website and linked online database are managed on behalf of White Horse by T-Consult Ltd.
- White Horse's website uses cookies which are files containing small amounts of information which are downloaded to your device when you visit a website. Our website uses only cookies that are essential for function or to improve performance. We do not collect information that identifies a visitor. By using our website you are deemed to have consented to the use of these cookies.
- Our website may contain links to other websites of interest. However these websites are out of our control and you should note therefore that they are not governed by this privacy statement. You should look at the privacy statement applicable to the website in question.
- Our website is linked with our online database and there is a full website privacy and security policy available to view on request.

## DATA RETENTION

- We will only keep personal data for the minimum amount of time necessary, subject to legal requirements.
- For those receiving government funding, data is retained for audit purposes and in accordance with the contractual rules relating to that apprenticeship. For those studying AAT we will comply with their retention rules.
- Initial application data received from those who do not subsequently study with us will be deleted after 6 months.
- Contact information for marketing purposes will be retained until we are asked to remove it.

## GENERAL

- All IT systems at White Horse are managed by Moore Stephens IT Solutions.
- Suitable security systems are in place to protect all data.
- All staff are aware of the requirements of data protection and GDPR.
- Under data protection regulation you may request details of personal information which we hold about you. If you would like a copy of this information or have any other questions please email [marylee.wollaston@whitehorseltd.co.uk](mailto:marylee.wollaston@whitehorseltd.co.uk).
- If you believe that any information we are holding on you is incorrect or incomplete, please email Marylee Wollaston as above or write to us at the address below.

## LINKS:

<b>AAT:</b>	<a href="https://www.aat.org.uk/get-myaat/privacy-policy">https://www.aat.org.uk/get-myaat/privacy-policy</a>
<b>ESFA:</b>	<a href="https://www.gov.uk/government/publications/esfa-privacy-notice">https://www.gov.uk/government/publications/esfa-privacy-notice</a>
<b>HowToMoodle:</b>	<a href="https://tob.howtomoodle.com/?dir=GDPR">https://tob.howtomoodle.com/?dir=GDPR</a>
<b>Onefile:</b>	<a href="https://www.onefile.co.uk/policies/privacy/index.html">https://www.onefile.co.uk/policies/privacy/index.html</a>
<b>LRS:</b>	<a href="https://www.gov.uk/government/publications/lrs-privacy-notice">https://www.gov.uk/government/publications/lrs-privacy-notice</a>
<b>T Consult:</b>	<a href="http://www.tconsult-ltd.com/privacy/">http://www.tconsult-ltd.com/privacy/</a>
<b>Moore Stephens IT Solutions:</b>	<a href="http://www.msbit.co.uk/privacy-policy/">http://www.msbit.co.uk/privacy-policy/</a>
<b>Pellcomp:</b>	<a href="https://www.pellcomp.co.uk/privacy-policy/">https://www.pellcomp.co.uk/privacy-policy/</a>
<b>SWATPro:</b>	<a href="http://www.swatpro.co.uk">www.swatpro.co.uk</a>