

Privacy Policy v3.0

Version	Date	Policy Author(s)	Next Review Date
Version 1.0	November 22	Kirsty Lewis & Victor Stephenson-Henshaw	November 23
Version 1.1	June 23	Kirsty Lewis & Victor Stephenson-Henshaw	November 23
Version 1.2	August 23	Victor Stephenson-Henshaw	November 23
Version 2.0	February 24	Victor Stephenson-Henshaw	February 25
Version 3.0	February 2025	Kirsty Lewis	February 2026

Version	Page No.	Paragraph / Bullet	Changes
Version 1.1	1		Change of Managing Director.
Version 1.2	3		Third party processors added - SoPro
Version 3.0	3 and 4	Categories of Data, Recipients of Data, 3 rd Party Processors, Data Retention	Additional categories of data included, additional possible recipients of data and circumstances it can be shared, reference to contract in place with 3 rd parties and reference to 7 year retention period.

Signed: Ayden Sims
 Ayden Sims (Mar 18, 2025, 3:59pm)

Printed Name: Ayden Sims

Job Title: AKG UK Country Manager

Date: 18 Mar 2025

Learn Plus Us is a trading name of Simply One Stop Ltd

VAT No: 680814328 | Company Registration No: 4684239 | Sterling House, 97 Lichfield Street, Tamworth, England, B79 7QF

Simply One Stop Ltd operate and trade under the name Learn Plus Us.

Learn Plus Us is an Apprenticeship and Skills Training Provider, approved by the Education and Skills Funding Agency, to deliver apprenticeships, Advanced Learner Loans and other work-based learning across England and is an accredited training provider offering commercial training internationally. Learn Plus Us provides work-finding services to its clients and work-seekers, accredited and non-accredited training delivery and keeps clients up to date with courses and industry/sector news. Learn Plus Us must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Learn Plus Us acts as both a Data Controller and a Data Processor.

You may provide your personal details to Learn Plus Us directly, for example by completing an application or registration form or by making an enquiry via our website.

We may also collect your personal information from other sources such as employers, support agencies, referrers, or partner organisations.

Purpose of Processing and Legal Basis

Learn Plus Us process personal data for the purposes of delivering our services which may include providing you with work-finding services, accredited and non-accredited training delivery or keeping you up to date with courses and industry/sector news.

We may also use your information during the course of internal and external audits where we may be required to demonstrate our compliance with contractual requirements, industry standards and to demonstrate that we are providing you with a good service.

Our legal basis for processing your information:

Personal Data

- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you or commissioner of our services

Sensitive Personal Data (sometimes called Special Category Data)

- Your consent
- To carry out our obligations in the field of employment and social security and social protection law.

You do not have to give your consent and may withdraw this consent at any time however, you should be aware that, if you do not wish to provide consent to collect or store your Sensitive Personal Data, this may limit the services we can offer you and therefore reduce their effectiveness.

Categories of Data

Learn Plus Us may collect the following Personal and Sensitive Personal Data:

- personal details e.g name, address, date of birth, contact details
- family details e.g emergency contact
- lifestyle and social circumstances
- financial details e.g bank details

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- education, training and employment history
- unspent criminal conviction information
- support needs e.g. physical or mental health information which may need taking account of to make reasonable adjustments
- racial or ethnic origin
- religious or other beliefs
- trade union membership

You may also choose to share other information with us in relation to your personal and domestic situation or family circumstances or any other information that could affect your ability to fully engage with us. You may also want to provide us with contact details for your next of kin or family member or someone who may act as a carer, translator or support for you.

All this information is stored securely in our IT systems. Your record containing your personal details is held within our case management system, PICS, provided by Advanced Computer Software Group. The system is cloud hosted in Microsoft Azure utilising data centres within the UK. No data is transferred outside the UK.

Recipients of Data

Learn Plus Us may share your Personal Data and/or Sensitive Personal Data with third parties, however where required, we will obtain your consent before sharing this information.

The organisations and people we regularly share information with are:

- business associates and other professional advisers e.g. tutors and assessors
- educators and awarding bodies
- current, past or prospective employers
- family, associates and representatives of the person whose personal data we are processing
- employment and recruitment agencies
- student loan company, ESFA, GLA and other funding bodies
- suppliers and service providers
- central government (Department for Education)
- the organisation that referred you to our programme
- debt collection and tracing agencies

There may be times when we are legally required to share information with statutory agencies such as the Police, Local Authorities, Courts or HMRC. This may be in relation to safeguarding risks, criminal or civil proceedings or fraud. Information can be shared without your knowledge in these circumstances.

There may be other times when we are requested to provide the information we hold on you by third parties not related to the delivery of our services, and where required, we will seek your explicit agreement before providing any information.

If we were to sell or transfer our business or part of our business this may involve the transfer of our operations and/or records to another organisation(s). As part of the sale or transfer, your personal data may be transferred to the new organisation(s) who will, under the terms of this Privacy Notice, be permitted to use this data for the purposes for which it was collected i.e. to deliver our services.

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Third Party Processors

Our carefully selected partners and service providers may process personal information about you on our behalf. Where appropriate, a contract with those third parties will be in place.

Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.

Data Retention

Learn Plus Us will retain your personal data only for as long as is necessary for the purpose we collect it. This is usually for a 7-year period following the end of your engagement with us. However, different laws and contractual and funding requirements may require us to keep different data for different or longer periods of time.

Your Rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data Learn Plus Us processes on you
- The right of access to the personal data Learn Plus Us processes on you
- The right to rectification of your personal data
- The right to erasure of your personal data in certain circumstances
- The right to restrict processing of your personal data
- The right to data portability in certain circumstances
- The right to object to the processing of your personal data that was based on a public or legitimate interest
- The right not to be subjected to automated decision making and profiling
- The right to withdraw consent at any time
- The right to make a complaint to the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, if you think we are doing something wrong.

If you wish to exercise any of these rights or you have any queries relating to this Policy, please contact the Data Protection Officer at DPO@akguk.co.uk

There may be circumstances where Learn Plus Us will be unable to fulfil a request for example if we were to receive a request for erasure but were legally or contractually obliged to retain that data for a specific period of time. In these circumstances, this would be explained to you, and we would only retain the data required by those legal or contractual obligations. All other data would be erased.

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Website Access and Usage

Our website uses cookies - a cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Our website allows you to set your cookie preferences:

Silver - Highest level of privacy. Data accessed for necessary basic operations only. Data shared with 3rd parties to ensure the site is secure and works on your device.

Gold - Balanced experience. Data accessed for content personalisation and site optimisation. Data shared with 3rd parties may be used to track you and store your preferences for this site.

Platinum - Highest level of personalisation. Data accessed to make ads and media more relevant. Data shared with 3rd parties may be used to track you on this site and other sites you visit.

Your preferences and the cookies are then stored for one month however web browsers allow you to delete cookies.

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Parties involved with this document

Document processed	Party + Fingerprint
Tue, 18th Mar 2025 15:59:28 GMT	Ayden Sims - Signer (0944bfe2822f81e0d3e6350058fbb60b)
Tue, 18th Mar 2025 15:59:28 GMT	Debbie Gardiner - Copied In (339d2b0fd49f51cd30861ede82fe73c1)
Tue, 18th Mar 2025 15:59:28 GMT	Annie Rayer - Copied In (f79ccf5369a1c30bdf97bb8c663f683b)

Audit history log

Date	Action
Tue, 18th Mar 2025 15:34:08 GMT	Envelope generated by Annie Rayer (81.96.193.50)
Tue, 18th Mar 2025 15:34:14 GMT	Document generated with fingerprint f59fa8a893b81d9dba51677822c01655 (81.96.193.50)
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Tue, 18th Mar 2025 15:34:25 GMT	Document generated with fingerprint cfe4cc1f8f24cec8174e26977001cf0 (81.96.193.50)
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Tue, 18th Mar 2025 15:59:28 GMT	Ayden Sims signed the envelope (86.190.98.117)
Tue, 18th Mar 2025 15:59:28 GMT	Sent the envelope to Debbie Gardiner (Debbie@learnplusus.co.uk) for signing (86.190.98.117)
Tue, 18th Mar 2025 15:59:28 GMT	Sent the envelope to Annie Rayer (annie.rayer@jobs-22.co.uk) for signing (86.190.98.117)

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