



Educ8 Training Group of Companies

Privacy Notice (Commercial)

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Commercial Training and Other Group Services

(Excluding Apprenticeships)

1. Introduction

Educ8 Training Group ("**ETG**") is one of the largest independent training providers in England and Wales. All companies within the ETG uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

At the date of this policy these companies are:

- Educ8 Training Group Limited, registered number 10865705.
- Haddon Training Limited, registered number 04773490.
- Aspire and Learn Ltd, registered number 08784755.
- Educ8 Ltd, registered number 05059754.

Any reference to "ETG" throughout this policy includes all the companies named above.

For the purpose of this policy the reference to "Funding Bodies" includes, but is not restricted to, the Welsh Government, DfE/Education Skills Funding Agency (ESFA), and local authorities.

2. Purpose

ETG provides a range of commercial and non-apprenticeship services, including but not limited to:

- Commercial training and short courses
- Skills bootcamps
- Employability programmes
- Employer-funded or individual-funded training
- Events, workshops and CPD activity
- Taster sessions and pre-enrolment activity

This Privacy Notice explains how we collect, use and protect personal data for all such services, excluding apprenticeships, which are covered by a separate privacy notice. We are the Data Controller for the personal data we process.

Although this Notice does not primarily relate to under 16 learners, we may from time to time work with this age group as part of Alternative Education, Inclusion or school based provision. In such cases, we do not routinely collect personal data directly and will only process limited information where necessary, in line with safeguarding responsibilities and in partnership with referring organisations such as schools or Local Authorities.



3. Personal Data We Collect

We may collect and process the following types of personal data:

Identity and Contact Information

Name, date of birth

- Address, email address, telephone number
- Emergency contact details

Enrolment and Participation Information

- Course or programme applied for or attended
- Attendance, engagement and assessment records
- Feedback, surveys and evaluation responses

Financial and Payment Information

- Invoicing details
- Payment records (including employer-funded arrangements)

Equality, Diversity and Learning Support Information (where provided)

- Information about disabilities or additional learning needs
- Equality monitoring data (where collected and lawful to do so)

Technical and Usage Information

- IT system access credentials
- Online learning platform usage data
- Photograph, video or audio recordings (where applicable and notified)

Marketing and Engagement Information

- Records of marketing engagement activity — including webinar registrations, event attendance, networking activity and participation in employer engagement campaigns.
- CRM and communication tracking data — including interaction history, enquiry records, correspondence details, and recorded preferences where individuals or employer representatives engage with us regarding commercial services.
- Feedback, testimonials and case study participation — where individuals or employers agree to provide feedback, testimonials, or take part in promotional or impact-related content.

We do not deliberately collect unnecessary personal data, and we will only process special category data where there is a clear lawful basis.

4. How We Use Personal Data

We use personal data to:

- Deliver and administer commercial training and services
- Manage enrolment, participation and completion
- Communicate with individuals and employer clients



- Process payments and manage contractual arrangements
- Maintain safeguarding, health and safety and quality assurance
- Monitor performance, quality and improvement
- Meet legal, regulatory and funding requirements (where applicable)
- Plan and deliver marketing engagement activities, including events, webinars and employer campaigns
- Manage relationship data within CRM systems, including tracking enquiries, engagement history and communication preferences
- Develop promotional materials, case studies and testimonials where consent or appropriate lawful basis applies
- Analyse engagement activity to improve commercial services and outreach

5. Lawful Bases for Processing

- Under the UK GDPR, we rely on one or more of the following lawful bases:
- **Contract** – to deliver training or services
- **Legal obligation** – where we are required to comply with law or regulation
- **Legitimate interests** – to manage and improve our services, including managing employer relationships, engagement activity and business development, balanced against individuals' rights and expectations
- **Consent** – where required (e.g. marketing communications or media use)
- Where **special category data** is processed, we rely on:
- Employment, social protection or safeguarding conditions
- Explicit consent (where required)

6. How We Share Personal Data

We may share personal data with:

- Employer clients or sponsors (where applicable)
- Awarding bodies or certification partners
- IT and learning platform providers
- Professional advisers and auditors
- Regulators or law-enforcement bodies, where legally required
- Third-party platforms used for events, webinars, CRM and marketing communications (for example Microsoft Teams, HubSpot, Eventbrite), where necessary to deliver services and engagement activity

All third parties are required to process data securely and lawfully, under appropriate contracts.

7. International Transfers



Personal data is primarily processed within the UK. If data is transferred outside the UK, appropriate safeguards (such as adequacy regulations or standard contractual clauses) are used.

8. How We Keep Data Secure

We use appropriate technical and organisational measures to protect personal data, including:

- Access controls and role-based permissions
- Secure IT systems and encryption
- Staff training and confidentiality obligations
- Regular reviews and risk assessments

Alternative Education / Inclusion risk

Within Alternative Education and Inclusion services, where staff may process highly sensitive data including Education, Health and Care Plans (EHCPs), enhanced data protection controls are applied, including the use of secure communication platforms such as Egress.

Egress rollout and Local Authority requirement

Access to secure email encryption tools is being expanded across relevant teams to ensure compliance with Local Authority requirements and to mitigate the increased risk associated with sharing special category personal data.

9. How Long We Keep Personal Data

We only retain personal data for as long as necessary for the purposes collected, in line with our Records Retention Schedule.

Retention periods vary depending on the nature of the service, contractual requirements and legal obligations.

10. Your Rights

Under data protection law, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent (where processing is based on consent)

Requests can be made using the contact details below.



11. Automated Decision Making

We do not use automated decision-making or profiling that produces legal or similarly significant effects.

12. Contact Us

If you have questions about this Privacy Notice or how we use personal data, please contact:

Data Protection Officer / Data Protection Lead

Educ8 Group

Email: traceyo@educ8training.co.uk

13. Complaints

If you are unhappy with how we handle your data, you have the right to complain to the

Information Commissioner's Office (ICO):

www.ico.org.uk