

## **PRIVACY NOTICE**

“Intuitive Thinking Skills Ltd”, “We”, “Us”, “Our”, within this document means Intuitive Thinking Skills Ltd, a company registered in the UK from The Think Tank, 457 Chester Road, Trafford, Manchester, M16 9HA. Our company registration number is 05204890.

### **What this Privacy Notice is about**

This notice sets out how we collect, use and store your personal data.

When you interact with us by phone, mail, in person or online, we often receive personal information about you. We are registered with the Information Commissioner’s Office as a data controller in respect of your personal data for the purposes of data protection law and are responsible for ensuring that we use your personal data in compliance with data protection law. Our ICO registration number is Z3591862.

We are committed to protecting your privacy. We will always keep your personal information safe and will never sell it to third parties. We will be clear and open with you about why we collect your personal information and how we use it. Where you have choices, this notice explains them to you and we will respect your wishes.

### **How we Collect Information about You**

We collect your personal data where we receive information about you directly, whether face-to-face, by phone, and by e-mail; when you enquire about or apply for employment with us; or where we receive information about you from third parties, for example where you are being referred to one of our courses by a partner agency. However, third parties should only provide us with this information where you have given them permission to share your information and you should raise any concerns about this with your referring agency.

This information may include, but is not limited to, your name, address, contact telephone number, email address, gender, date of birth, ethnicity, substance use, health concerns/disability, any safeguarding concerns, and any other relevant information such as work commitments or literacy issues. There may be other relevant necessary information for a specific course such as national insurance number; employment status or offending status.

Additionally, in running and maintaining our website we may collect and process the following data about you: Information about your use of our site including details of your visits such as pages viewed, length of visits and the resources that you access.

A 'Cookie' is a file in your web browser that enables us to recognise your computer when you visit intuitivethinkingskills.co.uk and make our site quicker and easier to use (e.g. login fields may be pre-filled with your details). Cookies are also essential to the functioning of certain parts of the site and we use them to collect information about how the site is used, such as how many people visit and return and what products are being viewed.

We do not routinely collect any personal data about you through our website, however, we may collect your personal data whenever you provide us with information through the website, for example when you:

- submit personal information to us using our online forms;
- enquire about our activities;
- register with us;
- undertake one or more of our online courses:

For some of our delivery, we may record details of conversations and interactions with you, such as when undertaking vocational assessments, and to help improve the accuracy and quality of our records, we use Magic Notes powered by Beam, a secure AI-powered tool. This helps us create clear and accurate notes which will assist in improving the quality of the support we can offer. Before recording our conversations, we will make sure you are happy for us to record and ask for your consent. If you do not agree to the recording, we will capture the same information by taking notes manually.

We may also use Interpret (Real Time Translation) which is hosted in the Magic Notes website. Interpret is used to increase access to support for clients for whom English is not their first language and improve outcomes. Interpret translates conversations in real time, but there is an option to transcribe that conversation in Magic Notes if required.

The recording within the Magic Notes system is stored in the UK and is retained for 60 days before it is automatically deleted. The transcription of the recording is reviewed and amended where relevant and uploaded to your case record.

### **How we use your information**

Your personal data may be stored and processed by Intuitive Thinking Skills Ltd in the following ways and for the following purposes:

- Providing you with the services, products or information you have requested or been referred for
- Managing our relationship with you
- Monitoring your individual progress and outcomes
- Undertaking anonymised statistical analysis (we won't be able to identify individuals from this data)
- Reporting to the appropriate legal and regulatory authorities, and complying with law;
- Understanding how we can improve our services, products or delivery.
- Processing your application for employment and monitoring our recruitment practice anonymously
- Managing your employment with us once recruited

We can use your personal data in these ways because either:

- you have consented to such use;
- we have a contract with you;
- we have legal, regulatory and contractual obligations that we must comply with;
- the use of your personal data is necessary for the legitimate business interests of our company
- we may need to establish, exercise or defend our legal rights or for the purpose of legal proceedings.

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### **How long do we keep your personal information?**

We hold your personal information for as long as we have a legal or business reason to do so, which generally means for as long as you remain engaged with Intuitive Thinking Skills; for seven years as required by the National Open College Network where you have completed an accredited course; or as required to meet our legal obligations, including for 6 years following termination of employment as required by HMRC to resolve disputes or enforce our agreements. We will always store it securely and will not use it for any other purpose to those listed above.

### **Disclosure of your information to third parties**

We may need to share your information with third parties where you have been referred by a partner agency, including to confirm your attendance, completion and outcome feedback; or where we are required to disclose your identity for regulatory and legal purposes.

Your personal data is only accessed by employees of Intuitive Thinking Skills Ltd or such companies (e.g. the National Open College Network) that have a need to process your data for the purposes described in this notice.

We may also share your personal data :-

- When you have requested referral or contact with third parties to help coordinate support for you and/or to signpost you to services provided by other organisations;
- If we sell all or part of the company we may disclose your personal data to the buyer for legal or regulatory and continuity purposes
- To third party agents, contractors, professional or legal advisors for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice
- Where required by law, to the police, regulatory bodies or legal advisors, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.
- To secure references and 'disclosure' from the Disclosure and Barring Service relating to your employment but will seek your consent prior to doing so

### **Your rights**

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. However, we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;

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- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request; and,
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us at the address at the end of this notice. Or you can email the Data Protection Officer directly at [DPO@akguk.co.uk](mailto:DPO@akguk.co.uk)

You can find out more information about your rights by contacting the Information Commissioners Office, or by searching their website at <https://ico.org.uk/>.

### **Social Media**

By using our social media sites and pages, including Facebook and Twitter, you consent to our collection and use of the information you provide in the way set out in this policy.

If you do not agree to this policy please do not use our sites, social media pages or services.

### **How we store and keep your information safe**

Intuitive Thinking Skills Ltd hold and stores all information on secure databases and servers entirely within the United Kingdom that are protected through extensive electronic, physical and managerial measures to ensure your information is kept safe and secure.

Where we use third parties suppliers involving the processing of data, these are subject to detailed confidentiality agreements and contracts relating to any personal data they have access to.

When we change our processes and procedures we consider the need to undertake a Data Protection Impact Assessment to ensure we are clear of any impact on data protection of proposed changes.

We respect the fact that your personal information is your information, and we'll make it easy for you to update or change your personal details or consents. Please help us to help you by letting us know if your contact details change or if you spot any errors in the information we hold about you by contacting us at the address below.

### **Contacting Us**

Intuitive Thinking Skills Ltd  
457 Chester Road  
Trafford  
Manchester  
M16 9HA

Freephone: - 0800 069 9198

Email: - [info@intuitivethinkingskill.com](mailto:info@intuitivethinkingskill.com)

Website: - [www.intuitivethinkingskills.co.uk](http://www.intuitivethinkingskills.co.uk)

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