



## The Xenon Group Privacy Policy

This privacy policy explains how we use any personal information we collect about you when you use this website. It applies to all products and services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of The Xenon Group.

### Topics:

- Changes to this privacy notice
- Who we are, how do you contact us and our Data Protection Officer
- What information do we collect about you?
- What is the source of your personal information?
- How will we use the information about you?
- What are the legal grounds for our processing of your personal information (including when we share it with others)?
- What should you do if your personal information changes including access to your information and correction
- How long do we keep information for
- Marketing

### Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website <http://www.xenongroup.co.uk/>

### The Xenon Group and our Data Protection Officer

We are Xenon Management Training and Recruitment Ltd known as The Xenon Group. Our registered office is Carrwood Park, Selby Road, Leeds LS15 4LG. We are a data controller of your personal data.

We have a dedicated data protection officer (“DPO”). You can contact the DPO using the details below or by writing to the above address, marking it for the attention of the DPO or going to [Contact Us](#)

### What information do we collect about you?

Personal information that we’ll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact details history
- **Your date of birth, gender and/or age**
- **Your nationality**, if needed for the product or service
- **Records of your contact with us** such as via the phone and, if you get in touch with us online using our online services or via our smartphone app, details such as your mobile phone location data, IP address and MAC address



- **Courses** you have enrolled on with us, as well as have been interested in and have held and the associated payment methods used
- **Marketing to you and analysing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you.
- **Information about your health or if you are a vulnerable customer** if this has been declared by you on your enrolment form
- **Information about your employment status**, if relevant
- **Your residency and/or citizenship status**, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK

### **What is the source of your personal information?**

We'll collect personal information from the following general sources:

- From you directly when you enquire about our courses or recruitment services
- Information generated about you when you use our products and services

### **How will we use the information about you?**

We use your personal data, including any of the personal data listed in section 1 above, for the following purposes:

- **Recruitment** : Assessing an application for a job we have on offer prior to sending that information over to our client including considering whether or not to put you forward for interview
- **Training**: Assessing an application for a training course including considering whether or not to offer you a place on a specific course
- Managing the product or service you have with us
- Updating your records
- To improve the operation of our business
- To follow guidance and best practice under the change to rules of regulatory bodies
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our staff
- To administer our good governance requirements and those of other members of The Xenon Group, such as internal reporting and compliance obligations
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using LinkedIn, Facebook Custom Audiences and Google Custom Match). Offers may relate to any of our products and services such as training courses or recruitment opportunities
- To develop new products and services and to review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our customers both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
- To share information, as needed, with regulatory bodies such as BIFM



- To facilitate the sale of one or more parts of our business
- The Xenon Group will not share your information for marketing purposes with companies outside the Xenon Group.

## **What are the legal grounds for our processing of your personal information (including when we share it with others)?**

We rely on the following legal bases to use your personal data:

### **1. Where it is needed to provide you with our products or services, such as:**

- Assessing an application for a course you wish to enrol on or a job you wish to apply for including consideration of whether or not to offer you the product, the price, the payment methods available and the conditions to attach
- b) Managing courses you are enrolled on with us, or an application for one
- c) Updating your records, tracing your whereabouts to contact you about your course and doing this for recovering debt (where appropriate)
- d) Sharing your personal information with regulatory bodies such as BIFM and Ofqual for training courses and with clients for job applications
- e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of training courses or recruitment applications

### **2. Where it is in our legitimate interests to do so, such as:**

- Managing your training course and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- To perform and/or test the performance of, our products, services and internal processes
- To follow guidance and recommended best practice of government and regulatory bodies
- For management and audit of our business operations including accounting
- To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that.
- To carry out monitoring and to keep records of our communications with you and our staff (see below)
- To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using LinkedIn, Facebook Custom Audiences and Google Custom Match)



- Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
- For some of our profiling and other automated decision making
- Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

### 3. To comply with our **legal obligations**

### 4. With your **consent or explicit consent**:

- For some direct marketing communications
- For some of our profiling and other automated decision making
- For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer or some criminal records information

We may share information with the following third parties for the purposes listed above:

- Business partners (for example, BIFM), or others who are a part of providing your products and services or operating our business
- Governmental and regulatory bodies such as OfQual
- Employers/Contract Managers where your training course is funded by your employer
- Other organisations and businesses who provide services to us such as debt recovery agencies.
- Credit Reference and Fraud Prevention Agencies (see below)

### 5. **How and when can you withdraw your consent**

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

### 6. **What should you do if your personal information changes?**

You should tell us so that we can update our records using the details in the Contact Us section of our website. We'll then update your records if we can.

### 7. **Is your personal information transferred outside the UK or the EEA?**

We're based in the UK but sometimes your personal information may be transferred outside the European Economic Area, if for example, you have applied for an international job through our recruitment division or for a position within the UK or EEA but where the client is based outside the EEA. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

### 8. **Do you have to provide your personal information to us?**



We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

## 9. Do we undertake any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules and for quality control and staff training purposes. This information may be shared for the purposes described above.

## 10. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance – currently 3 years as required by BIFM.

## 11. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information
- The right **to have your personal information erased** (the "right to be forgotten")
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** ("data portability")
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

## 12. Your right to object



You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the [Contact Us](#) section of our website to exercise these rights.

### **13. What are your marketing preferences and what do they mean?**

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication.

#### **Contact Us**

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the [Contact Us](#) section of our website. Alternatively, you can write to The Xenon Group, Carrwood Park, Selby Road, Leeds, LS15 4LG marking it for the attention of the DPO.