



## Privacy Notice

Welcome to The Sherwood Psychotherapy Training Institute Limited's ("we", "us" and "our") privacy notice. We trade as "The Sherwood Psychotherapy Training Institute".

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you ask us to send you information, you apply to join us, you use our website, while you are a student and after you leave us and become one of our graduate members. This privacy notice also tells you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. **Please also use the Glossary** at the end to understand the meaning of some of the terms used in this privacy notice.

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### 1. Important information and who we are

This privacy notice tells you what personal data we collect about you, how we use the data and who might see it.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### Controller

The Sherwood Psychotherapy Training Institute Limited is the controller and responsible for your personal data. We are registered as a controller on the Data Protection Register. Our registration number is Z5182304.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### Contact details

Our full details are:

- Full name of legal entity: The Sherwood Psychotherapy Training Institute Limited
- Name or title of data privacy manager: Amanda Ackroyd
- Email address: **Amanda.Ackroyd@spti.net**
- Postal address: Sherwood Psychotherapy Training Institute, Thiskney House, 2 St James's Terrace, Nottingham, NG1 6FW

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated in July 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us

### **Third party rights**

Our website (at [spti.net](http://spti.net)) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are also "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes full legal name, informal name, previous names, marital status, title, date of birth, gender, and a photograph.
- **Contact Data** includes billing address, home address, email address and telephone numbers. Financial Data includes bank account and payment card details, sponsorship details.
- **Enrolment Data** includes details about payments to and from you and other details of courses, products and services you have purchased from us.
- **Academic Data** includes qualifications and other academic records; information about your professional experience; and information about disciplinary action taken against you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and IT systems (such as our virtual learning environments (Moodle) and access our library.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Categories Data:** includes information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; information about your health, including any medical condition (such as information about disability status or learning difficulty), health and sickness records; information about criminal convictions and offences.

The information we hold includes the details provided by you on application and enrolment, together with data which is collected during and after your studies. This can include "special categories" of more sensitive personal data.

We also collect, use and share Aggregated Data such as statistical data, demographic data and data about the race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation of our students for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your parts of your Identity, Enrolment and Special Categories Data to calculate the percentage of applications from different areas of the country or the percentage of applications from a particular racial group. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to enrol you on one of our courses). In this case, we may have to cancel your enrolment and we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Enrolment, Academic and Special Categories Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our courses;
  - enrol on to one of our courses;
  - request information or marketing material to be sent to you;
  - give us some feedback;
- **Automated technologies or interactions.** As you interact with our website and IT systems, we may automatically collect Technical Data about your equipment, browsing actions and patterns and the facilities or resources you have accessed. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties [and public sources] as set out below Technical Data from the following parties:
  - analytics providers [such as Google based outside the EU];

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation; or
- Where we have your consent.

Sometimes we may rely on consent as a legal basis for processing your personal data. Were we do so, you have the right to withdraw consent at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Special Categories Data is particularly sensitive personal information and requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process Special Categories Data of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where it is needed in the substantial public interest, such as for equal opportunities monitoring.
- Where it is required to protect your (or someone else's) vital interest and you are not capable of giving consent, such as for getting medical assistance for you.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table overleaf.

#### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
(a) To enrol you as a new student	(a) Identity (b) Contact (c) Financial (d) Academic	Performance of a contract with you
(a) To introduce you to sources of student finance (b) To process and assess bursary applications	(a) Identify (b) Contact (c) Academic	(a) Consent (b) Necessary for our legitimate interests (to help you fund your programme of study with us)
To deliver your course to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Arranging and delivering assessments	(a) Identity (b) Contact (c) Financial (d) Enrolment (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
(a) To arrange, and maintain, the certification or accreditation of our courses (b) To arrange your accreditation if you are a SPTI graduate member with the United Kingdom Council for Psychotherapy	(a) Identify (b) Contact (c) Academic (d) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to have our SPTI graduate members and our courses certified or accredited by recognised bodies)
To have our records and accounts independently audited	(a) Identify (b) Contact (c) Academic (d) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests to meet the auditing requirements of Student Finance England and the course designation process (which enables students to apply for student loans)
To conduct a Disclosure and Barring Service (DBS) search where you apply to do counselling work with vulnerable adults as part of your course	(a) Identity (b) Contact (c) Special Category Data (information relating to your criminal convictions)	(a) Consent for Identity and Contact Data, and explicit consent for Special Categories Data.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Enrolment (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how students use our services and facilities)

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Technical (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how students use our services and facilities to allow us to develop them and grow our business)
To provide: (a) Appropriate reasonable adjustments to accommodate any disability you may have (b) Pastoral care.	(a) Identity (b) Contact (c) Special Categories Data (information about your physical or mental health, or disability status)	(a) Consent for Identity and Contact Data, and explicit consent for Special Categories Data.
To monitor equal opportunities and diversity	(a) Special Categories Data (race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation) – however, this information will only be disclosed to third parties as Aggregated Data that does not identify you.	(a) Explicit consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how students use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of potential students and students for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about training opportunities and workshops that may be of interest to you	(a) Identity (b) Contact (c) Academic (d) Technical (e) Marketing and Communications	(a) Consent (b) Necessary for our legitimate interests (to develop our services and grow our business)

## Marketing from us

We may use your Identity, Contact and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which courses or services may be relevant for you (we call this marketing). You will receive marketing communications from us: (a) if you have requested information from us; or (b) are enrolled, or have previously enrolled, on a course with us (in which case such marketing communications will only be by email and text and be about similar courses to those you have already, or previously, enrolled with us); or (c) you have consented; and, in each case, you have not opted out of receiving that marketing.

## Third-party marketing

We will not share your personal data with any third party for marketing purposes.

## Opting-out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## Cookies

Where you use our website you can set your browser to refuse all or some browser cookies, or to alert you when cookies are set or accessed. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see cookie policy.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Sharing your personal data

We do not normally share your personal data with any third party, except that we will share your personal data with parties set out below for the purposes set out in the table above:

- ABC Awards ([abcawards.co.uk](http://abcawards.co.uk)) – but only if you are studying the Level 2 Award in Counselling Concepts course and then only for the purpose of award assessment and certification and equal opportunities monitoring;
- Staffordshire University (our degree validation partner) ([staffs.ac.uk](http://staffs.ac.uk)) – but only if you are on one of our degree programmes and only for the purpose of enrolment, assessment and award certification;
- The British Association for Counselling and Psychotherapy ([bacp.co.uk](http://bacp.co.uk)) – but only if you are enrolled on our BSc course, and only then for course accreditation purposes;
- The United Kingdom Council for Psychotherapy ([psychotherapy.org.uk](http://psychotherapy.org.uk)) – but only if you are enrolled on our post-graduate MSc courses, and only then for course accreditation purposes or if you are a graduate member and only then for membership purposes;
- The Higher Education Statistics Agency ([hesa.ac.uk/about/regulation/data-protection/notices](http://hesa.ac.uk/about/regulation/data-protection/notices)) and the Office for Students, formally known as the Higher Education Funding Council for England – but only for the purpose of meeting our regulatory obligations and ensuring that those enrolled on our courses remain eligible to apply for student loans;
- The Student Loans Company ([slc.co.uk](http://slc.co.uk)) – but only if you have a student loan from them or a claiming a disabled students allowance, and only then for the purpose of managing and supporting your student loans process by confirming your attendance on the funded programme and meeting other reporting requirements;
- Local authorities; the police and other bodies with enforcement powers where disclosure is necessary for the prevention or detection of crime or by law;

- The East Midland Shared Services (DBS umbrella organisation) – but only if we need to conduct a DBS search where you apply to do counselling work with vulnerable adults and only on the basis of your consent;
- To anybody providing you with a sponsorship or scholarship or other type of funding, but only if you have consented to such disclosure; and
- To third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

## **6. International transfers**

We do not transfer your personal data outside the European Economic Area.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our Information Management Policy which you can request from us by contacting us.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract – for example, our contract with you to deliver to you the course you have enrolled on.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent** means processing your personal data where you have given your unambiguous consent to our processing of your personal data.

## Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.