

GA Privacy, GDPR and Cookie Policy

1. Overview

This policy covers the data collected and processed by **Gatehouse Awards Ltd** ('GA'), the Data Controller, of the personal data we process on our own behalf and the Data Processor of data processed on behalf of our centres, partners and learners. We have a legal duty to protect the privacy of all personal and business data obtained from you while you are using our services and websites, as well as in the provision of our services to you.

This policy explains what information we may collect from you and the purposes for which it will be used. This policy complies with all current data protection and privacy regulations in the UK, including, but not limited to, the General Data Protection Regulations (the GDPR) and the Privacy and Electronic Communications Regulations (the PECR).

The GDPR relates to 'personal data' which covers any information which makes an individual (the Data Subject) identifiable.

GA centres may also wish to read the *GA Terms and Conditions of Business* alongside this document.

Learners should also read our **Learner Privacy Notice**, which explains in plain language how their personal data is collected, used, and retained throughout the assessment process. This sits alongside this policy and these documents should be read together.

2. Purpose of and Legal Basis for Processing Personal Data

GA applies data minimisation principles and only collects personal data for the purposes of delivering the services contracted by our centres, partners and learners, unless we are provided with specific consent to process for other purposes, such as marketing, or the purpose of complying with local laws or regulations. Personal data will never be processed without the knowledge and/or permission of the Data Subject.

GA is Recognised by The Office for Qualifications and Examinations in England (Ofqual) - <https://www.gov.uk/government/organisations/ofqual/about>, the Regulatory Body, for the purposes of offering Regulated qualifications. Regulatory Bodies are given their powers by Acts of Parliament, meaning that the regulations they enforce are backed by UK Law. GA therefore has a Legal Obligation to process certain Personal Data necessary to ensure compliance with those regulations. Links to the relevant website page of the Regulator have been provided above where you can find all the information on the role of the Regulator and the legislation under which they gain their powers.

By using our services, including accessing our websites and forms, etc. therein, you give your agreement to our processing any personal data we may have as described in this policy.

3. Types of Personal Data Processed

Personal Data is any information which could potentially make an individual identifiable and can include, but may not be limited to, your name, address, date of birth, email address, IP address and copies of identification documents.

We collect data in a number of ways including, but not necessarily limited to:

- As part of a Contract for Services, i.e. names and contact information of individuals, including where they are acting on behalf of a centre or partner organisation.
- Provided to us by centres in order that we can provide the regulated qualifications required by learners.
- Other forms of contact direct from learners such as for replacement certificates, complaints, enquiries and appeals.

GA may use Personal Data for the following purposes:

- **To provide and maintain our service**, including to monitor the usage of our service.
- **To manage your account**: to manage your registration as a user of the service. the personal data you provide can give you access to different functionalities of the service that are available to you as a registered user.
- **For the performance of a contract**: the development, administration, and execution of agreements related to the provision of qualifications, certifications, and associated services.
- **To contact you**: to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide you**: with news, updates to important policies, procedures and documents, and general information about approvals, qualifications, services and events which we offer that centres and/or learners reasonably need to fulfil the requirements relating to qualification delivery.
- **To manage your requests**: to attend and manage your requests to us.
- **For business transfers**: we may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our service users is among the assets transferred.
- **For other purposes**: we may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our service, products, services, marketing and your experience.

We may share your personal information in the following situations:

- **With service providers**: we may share your personal information with organisations providing services as part of our delivery of our qualifications and assessments.
- **For business transfers**: we may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **With affiliates**: we may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include any other subsidiary company, joint venture partners or other companies that we control or that are under common control with us.

- **With Regulators:** we may share your information with relevant national or international regulators or other government departments as required for compliance with statutory regulations and laws, etc.
- **With other users:** whilst all efforts will be taken to protect your personal information, where we organise public seminars, webinars or other events, we may share information with other attendees.
- **With your consent:** We may disclose your personal information for any other purpose with your consent.

We will not, at any time, sell your information onto third parties for the purposes of marketing.

4. Our Websites and Cookies

4.1. Who manages our websites?

The content of our websites is owned and edited by GA.

The main GA website is hosted by Netlify under a strict privacy contract clause, in line with GDPR. Their privacy policy can be found [here](#).

The GA online exams and online courses websites are hosted by Vultr. Their privacy policy can be found [here](#).

The GA learner management system is hosted by Digital Ocean. Their privacy policy can be found [here](#).

4.2. Website usage information

Usage Data is collected automatically when using GA's websites and services. Usage Data may include information such as your device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the site or GA services by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our websites and the services we provide by, or through, a mobile device.

Where you are a registered user of our website and have logged in, we may collect web usage information to enable us to build a demographic profile or to improve the services you have requested from us.

4.3. Cookies

We may use cookies and similar tracking technologies to track the activity on our sites and services and store certain information. Tracking technologies used are beacons, tags, and

scripts to collect and track information and to improve and analyse our service. The technologies we use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on your device. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts of our sites or services. Unless you have adjusted your browser setting so that it will refuse Cookies, our service may use cookies.
- **Flash Cookies.** Certain features of our sites and services may use local stored objects (or flash cookies) to collect and store information about your preferences or your activity on our Service. Flash cookies are not managed by the same browser settings as those used for browser cookies.
- **Web Beacons.** Certain sections of our sites and services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "persistent" or "session" cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser.

We may use both session cookies (which are deleted when you close your browser) and persistent cookies (which remain on your device for a set period), for example:

Essential/Necessary Cookies

- Type: Session and persistent cookies
- Purpose: These cookies may be essential to provide you with services available through our website and online platforms. They help authenticate users, maintain secure sessions, and prevent fraudulent use of accounts. Without these cookies, core website functionality may not be provided.

Functionality Cookies

- Type: Persistent cookies
- Purpose: These cookies may be used to remember your choices and preferences when using our platforms, such as login credentials, language settings, or interface preferences. They provide a more personalised experience and avoid requiring you to re-enter information on each visit.

Cookie Consent Cookies

- Type: Persistent cookies
- Purpose: These cookies may be used to record whether you have accepted or declined the use of non-essential cookies on our website, ensuring we don't repeatedly prompt you for the same consent.

Analytics Cookies

- Type: Persistent cookies
- Purpose: These cookies may be used to collect anonymous information about how visitors use our website, helping us improve functionality and user experience.

You can control cookie settings through your browser preferences. Where we implement non-essential cookies, we will seek your consent before their use and provide options to manage your preferences.

4.4. Third party content and linking to other websites

This privacy policy applies only to our websites. We are not responsible for privacy practices within any other websites. You should always be aware of this when you leave a GA website and we encourage you to read the privacy statement on any other website that you visit.

We may embed external content from third-party websites such as YouTube, or social media websites, including cookies. This content is not published on our website. It is delivered using devices and services from third party sites that can be inserted into our site such as media players, RSS feeds and widgets. These websites may use cookies. Their content is subject to the privacy policy of the relevant third-party provider and not ours.

5. Information sharing and disclosure

We may share your data with specified third parties for the purposes of supplying the services you have contracted us for or if required to by law or by a regulation based on a law, as outlined in section 3 above. We will not sell, rent or disclose your information to any third parties other than those set out in this privacy policy without your prior consent.

Under certain circumstances, the company may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

The company may disclose your personal data in the good faith belief that such action is necessary to:

- comply with a legal obligation
- protect and defend the rights or property of the company
- prevent or investigate possible wrongdoing in connection with the service
- protect the personal safety of users of the service or the public
- protect against legal liability

6. Retention of Data

Personal Data will always be held for the minimum amount of time required. This will depend on a number of factors, such as the terms and length of a contract or a relevant law or regulation based on law; for instance:

- centre details – held for a minimum of 6 years after the centre has ceased to be approved.
- learner details – held indefinitely for the purposes of being able to provide confirmation of a qualification at any time in the future, as required under Ofqual regulations.

- assessment records – held for a period of 12 months from the final assessment, unless a longer period is required for an investigation, appeal, or regulatory review.

Personal Data that has been gathered via enquiries, either in writing or over the telephone, which have not led to further request for services or opted into marketing, etc. will be held for a maximum of 12 months after the initial contact, unless additional permission is obtained from the Data Subject or a contract for services is brought into force in the interim.

Electronic Personal Data is encrypted and held in a secure manner on our cloud-based servers. The encryption used meets all current requirements for encrypted services and is updated regularly to ensure that it remains fit for purpose. Electronic data is deleted following a secure process to ensure there is no lapse in security at the point of deletion.

Paper-based Personal Data, where held, is stored in secure cabinets. It is destroyed using a secure data destruction procedure.

7. Your Rights

Under current legislation, Data Subjects have the following rights:

- **To be informed** – This policy is one of ways in which GA informs you how and why we process your data
- **Of access** – All Data Subjects have the right to request access to all of the data we hold on them. Any Data Subject requests received will be reviewed and responded to within one calendar month of receipt of the request. Most requests will be fulfilled free of charge, however, GA reserve the right to charge a reasonable administration fee for any requests deemed to be excessive, unfounded or repetitive.
- **Of rectification** – Should you find that any data we hold about you is incorrect, you can ask us to correct it and we will investigate and respond within one calendar month of receipt of the request.
- **Of erasure** – You can ask for your Personal Data to be erased permanently. All such requests will be responded to within one calendar month of the receipt of a request. Please note that, whilst we will always endeavour to fulfil requests, there may be some instances when this is not possible due to legal or regulatory reasons. We will always provide a full explanation in any such instances.
- **To restrict processing** – If you do not wish for your data to be erased, you may ask for it to be restricted so that we continue to hold it but not process it or use it in any way – we would essentially 'archive' your data. This is only applicable in certain circumstances; however we will look at all requests and respond within one calendar month of the receipt of a request.
- **To data portability** – All electronically held data can be transferred to another company in a structured, commonly used and machine-readable format on request. Please note that this will only include the data you have provided to us and not any ancillary data produced as a result of the services we have created during the provision of our services or where that data includes information regarding a third party. All requests for moving data will be responded to within one calendar month of a request being received.
- **To object** – You can object to our processing data for the purposes of marketing, scientific/ historical research and statistics, or legitimate interests or in the performing of a task in the public interest /exercise of official authority (including profiling). All such requests shall be responded to within one calendar month
- **Rights related to automated decision making, including profiling** – The GDPR sets out specific rights in relation to automated decision making. Please note that Gatehouse

Awards uses limited automated decision-making systems whilst processing your data, specifically where an assessment is marked electronically. However, all such assessment decisions can be reviewed and overridden by a human examiner and all initial rules are input into the system by humans.

- **To complain** – You have the right to raise a complaint regarding the processing of your data or our response to a request under the above rights. As part of this, you also have the right to escalate your complaint to a supervisory authority. In respect of data handling, you have the right to escalate your complaint to the Information Commissioners Office (ICO). Please go to <https://ico.org.uk/for-the-public/raising-concerns/> for full details.

Data Subjects have the right to withdraw their consent to our processing their data at any time.

In respect of any of the rights indicated above, if you would like to make a request, require further information, or have a complaint regarding our processing of your data please refer to the *GA Comments, Compliments and Complaints Policy* which is available on our website, or contact us directly.

8. Collection and Use of Children's Data

GA may collect and process personal data of children under 18 only in the context of providing educational qualifications and related services. We only collect personal data of minors that is necessary for the provision of our services, such as name, date of birth, school year, and educational information.

Children have the same rights as adults under data protection laws. We support children in exercising these rights and recognise that as children mature, they may be able to exercise their data protection rights independently.

Personal data of children is always processed with the utmost care and in compliance with all applicable data protection laws. For children under the age of 16, we require verifiable parental consent before collecting or using their personal data. Consent may be provided by the child's school or educational institution acting in loco parentis, where appropriate. If we discover that we have inadvertently collected personal data from a child without appropriate parental consent, we will delete that information as quickly as possible.

Parents or guardians can review, modify, or request the deletion of their child's personal data at any time.

When processing children's data for educational purposes, such as administering qualifications, we ensure that the processing is in the best interests of the child and does not infringe on their rights or freedoms.

We encourage parents or guardians to discuss this privacy policy with their children if they are engaging with GA's services.

9. Data Protection Enquiries and Contact Information

GA is committed to transparency and cooperation in all matters related to data protection and privacy. To facilitate this, we have designated a point of contact for all data protection inquiries.

GA's Data Protection Lead can be contacted via info@gatehouseawards.org

Our Data Protection Lead is responsible for ensuring that GA's data processing activities comply with the General Data Protection Regulation (GDPR) and other applicable data protection and privacy laws.

If you have any questions, concerns, or requests regarding this Privacy Policy or our data processing practices, please do not hesitate to contact our Data Protection Lead.

To exercise any of your rights under data protection and privacy laws please contact our Data Protection Lead using the contact information provided above. We may need to verify your identity before processing your request to ensure the security of your personal data.

We strive to respond to all data protection inquiries promptly, typically within 3 business days of receipt.

If you are unsatisfied with our response to your data protection inquiry or believe that we are not processing your personal data in accordance with the law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

The ICO's contact details can be found on their website at <https://ico.org.uk/make-a-complaint/>

10. Changes to this policy

We may make changes to this privacy policy at any time. Changes will be posted on our website and are effective immediately. Regularly reviewing this policy ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

Document Specification:	
Purpose:	This document sets out Gatehouse Awards' approach to ensuring the Privacy of individuals and the use of Cookies on its websites, etc., in line with GDPR and privacy regulations and legislation.
Accountability	Gatehouse Awards Governing Body
Responsibility	Responsible Officer
Version	7
Effective from	August 2025
Indicative Review date	August 2027
Links to Ofqual GCR	A1, A5
Other relevant documents	UK General Data Protection Regulations Data Protection Act 2018 GA Comments, Compliments and Complaints Policy & Procedure GA Terms and Conditions of Business GA Learner Privacy Notice