

Learners Privacy Notice

CLASSIFICATION
PUBLIC

Document Information

Document Name	Learners Privacy Notice
Class	Notice
Category Tag	
Classification	Public
Author	Olumide Odutola
Approver	Sarah Mackey
Issue Date	30/04/2025
Next Review Date	29/04/2026
Distribution	FIL, Public

Version History

Date	Version	Author	Comments
21/10/2024	1.0R	Olumide Odutola	Initial copy
30/04/2025	1.1R	Olumide Odutola	<ul style="list-style-type: none"> Document name changed from Customers Privacy Notice to Learners Privacy Notice Updated section 4 to reflect Apprenticeship-related processing activities Post-exam reflection survey processing activity

Contents

Document Information2

Version History.....2

1. Introduction4

2. Contact Details.....4

3. Personal Data.....4

4. Data Collected, Processing Purposes, Lawful Bases, Data Sharing, and Retention Periods.....4

5. Recipients of Personal Data and International Transfers9

6. Your Rights In Relation To This Processing 11

1. Introduction

First Intuition is committed to respecting your privacy. This notice explains how we comply with the law on data protection, what your rights are, and how we may use the personal information we collect before, during and after your relationship with us as a customer.

First Intuition will be the data controller of any of your personal information as defined in Article 4(7) of the UK GDPR. This notice applies to our current and former customers. This notice does not form part of any contract and is for informational purposes only. References to "FI", "we," "our" or "us" in this privacy notice are to First Intuition.

2. Contact Details

First Intuition's Data Protection Officer oversees our compliance with data protection legislation. Our ICO registration number is ZA057033.

Our contact details are the following:

Telephone: 0207 323 9636

Email: dpo@firstintuition.co.uk

Postal Address: County House, Conway Mews, London. W1T 6AA.

3. Personal Data

When you interact with FI in relation to your relationship with us as a customer/learner, you may provide us with, or we may obtain, personal data about you.

We typically collect personal data about learners through the registration and course bookings process, either directly or sometimes from their employers. We may sometimes collect additional information from third parties including background checking services.

4. Data Collected, Processing Purposes, Lawful Bases, Data Sharing, and Retention Periods

Depending on the processing activity, we may rely on one or more of the following lawful bases for processing your personal data under the UK GDPR:

- Article 6(1)(a) which is where you have given us your consent to process your personal data.
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our public task.
- Article 6(1)(f) for the purposes of our legitimate interest.

When we process special category, we must also have additional conditions with which to do so.

The table below describes the main purposes for which we process your personal data, the categories of your information involved, and our lawful bases for being able to do this. It also includes the types of organisations we share your personal data with and how long we keep your personal data.

Non-Special Category Personal Data				
Data Collected	Purpose	Lawful Basis	Data Sharing	Retention Period
(Apprentices) Full Name, Address, Date of Birth, Phone Number, Email address, NI Number, ULN, Next of Kin – name, phone number and relationship, Prior Attainment Level, Employer – name, address, contact details, Gender	ESFA/DfE Statutory returns	<ul style="list-style-type: none"> Contract Legal Obligation 	<ul style="list-style-type: none"> Employees Suppliers / service providers Government departments 	6 years after completion
(Apprentices) Full Name, Address, Date of Birth, Phone Number, Email address, NI Number, ULN, Next of Kin – name, phone number and relationship, Prior Attainment Level, Employer – name, address, contact details, Gender	Provider Data Self-Assessment (PDSAT) Reports	<ul style="list-style-type: none"> Contract Legal Obligation 	<ul style="list-style-type: none"> Employees Government departments 	6 years after completion
(Apprentices) Full Name, Postcode, Date of Birth, Email address, Unique Pupil Number, Universal Candidate Identifier, Gender	Managing & Creating ULNs	<ul style="list-style-type: none"> Contract Legal Obligation 	<ul style="list-style-type: none"> Employees Government departments 	6 years after completion
(Apprentices) Full Name, Email address, ULN	Learner Onboarding	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	6 years after completion
Full name, Personal email address, Business email address, Telephone/mobile number, Home address, Date of Birth, Payment Card Information, Qualifications, Details of criminal offences,	Course bookings	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Employees, Suppliers / service providers 	6 years after completion

Registration Body Number, Unique Learner Number				
Full name, Personal email address, Business email address,	Course bookings	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Education providers 	6 years after completion
Disability details	Course bookings	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Employees 	6 years after completion
Name, Telephone / mobile phone number, Delivery address	Course materials delivery	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Suppliers / service providers, 	6 years after completion
Name, email address, Business email address Unique Learner Number, Job role	Virtual Learning Environment (VLE)/Online LMS	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Employees, Suppliers / service providers 	6 years after completion
IP address	To monitor your activity on our Online LMS	<ul style="list-style-type: none"> Legitimate Interest 	<ul style="list-style-type: none"> Suppliers / service providers 	6 years after completion
Full name, Personal email address, Business email address, Telephone/mobile number, Home address	Pearson Vue Exam	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Suppliers / service providers 	6 years after completion
Passport number/copy	Apprentice Right to Work Checks for funding purposes for UK and non-UK nationals	<ul style="list-style-type: none"> Legal obligation 	<ul style="list-style-type: none"> Employees, Suppliers / service providers 	6 years after completion
Full name, Personal email address	Student marketing	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Employees, Suppliers / service providers 	6 years after completion
Full name, Personal email address, Business email address	Student Exam Admin (Marking)	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Employees Suppliers / service providers Consultants 	6 years after completion
Disability details	Student Exam Admin (Marking)	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Employees Consultants 	6 years after completion
Full name, Personal email address, Business email	Student Exam Admin (Marking)	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Clients 	6 years after completion

address, Telephone/mobile number, Billing address, Qualifications, Employment History				
Biometric data (CCTV, photos)	Crime prevention and detection	<ul style="list-style-type: none"> Legitimate interests 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	30-days or longer if there is an incident
Full name, Personal email address, Business email address, Telephone/mobile number, Home address, Date of Birth, Delivery address, Billing address, Business address, National Insurance number, Payment Card Information, Qualifications, Location data, Skills coach/tutor comments	Data Analysis & Reporting	<ul style="list-style-type: none"> Legitimate interests 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	6 years after completion
(Apprentices) Full Name, Address, Date of Birth, Phone Number, Email address, NI Number, ULN, Next of Kin – name, phone number and relationship, Prior Attainment Level, Employer – name, address, contact details, Gender	Data Analysis & Reporting	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	6 years after completion
Disability details, Health data	Data Analysis & Reporting	<ul style="list-style-type: none"> Legitimate interests 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	6 years after completion
Full name, Personal email address, Business email address, Registration Body Number	Post-exam Reflection Surveys	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	6 years after completion
Special-Category Personal Data				
Data Collected	Purpose	Lawful Basis and Conditions	Data Sharing	Retention
(Apprentices) Ethnicity, Learning Difficulty or Disability,	ESFA/DfE Statutory returns	<ul style="list-style-type: none"> Contract Legal Obligation 	<ul style="list-style-type: none"> Employees, 	6-years after completion

Unspent Criminal Convictions (Yes/No)		<ul style="list-style-type: none"> Article 9(2) (g) Reasons of substantial public interest (with a basis in law) 	<ul style="list-style-type: none"> Suppliers / service providers Government departments 	
(Apprentices) Ethnicity, Learning Difficulty or Disability, Unspent Criminal Convictions (Yes/No)	Provider Data Self-Assessment (PDSAT) Reports	<ul style="list-style-type: none"> Contract Legal Obligation Article 9(2) (b) Employment, social security and social protection (if authorised by law) 	<ul style="list-style-type: none"> Employees, Government departments 	6-years after completion
(Apprentices) Passport number/ copy	Apprentice Right to Work Checks for funding purposes for UK and non-UK nationals	<ul style="list-style-type: none"> Legal obligation Article 9(2) (b) Employment, social security and social protection (if authorised by law) 	<ul style="list-style-type: none"> Employees, Government departments 	6-years after completion
(Apprentices) Ethnicity, Learning Difficulty or Disability	Data Analysis and Reporting	<ul style="list-style-type: none"> Contract Article 9(2) (c) Vital interests 	<ul style="list-style-type: none"> Employees, Suppliers / service providers 	6-years after completion

When we rely on the lawful basis of legitimate interest to process your personal data, we must tell you what these legitimate interests are. The legitimate interests we rely on are as follows:

- In relation to our contract with your employer where we are providing training to you on their behalf.
- In relation to sending marketing messages to you.
- In relation to crime detection and prevention.
- In relation to monitoring your activity on our learning platform.
- In relation to data analysis and reporting.
- In relation to system and data backups and maintain business/service continuity.

Where you have given us your consent to use your personal information, you have the right to withdraw this consent at any time. You may do this by contacting us as described in the "Contact Details" section above.

Please note that the withdrawal of your consent will not affect any use of the data undertaken before consent is withdrawn, and we may still be entitled to hold and process relevant personal information on bases other than consent. Withdrawing consent may also have the same effects as not providing the information at all, for example, we may no longer be able to provide certain services to you.

In some cases, you will have a legal, contractual, or other, requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to properly perform our contract with you or comply with legal obligations. In cases where you are not under obligation to provide such information, failing to provide it may still mean we are not able to properly perform our contract with you.

5. Recipients of Personal Data and International Transfers

FI is required to transfer the personal information provided by its service users to third parties to fulfil contractual obligations.

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

Appropriate safeguards for international transfers are:

- Adequacy decisions
- International Data Transfer Agreements (IDTA)
- Standard Contractual Clauses (SCC)

Please contact us using the details found in the “Contact Details” section for more information on our use of international transfers.

The following are categories of recipients that service user information could be transferred to:

Data Processor	Nature of Processing	Categories of Personal Data	Location of Data	Security Measures	Transfer Safeguard
Microsoft 365	Office productivity apps	Personal data is contained in office apps created by employees and stored in applicable cloud products.	UK	Microsoft compliance	n/a
Innovate Learn Ltd	Virtual Learning Environment (VLE)/ Online LMS	Name, email address, Business email address, Unique Learner Number, IP address, Job role	UK	Innovate Privacy Policy	n/a
Administrative Ltd	Training Management System (Course Booking)	Full name, Personal email address, Business email address, Telephone/mobile number, Home address, Date of Birth, Payment Card Information, Qualifications, Details of criminal offences, Registration Body Number, Unique Learner Number,	EU	Administrative Compliance	Adequacy Decision
Accessplanit Ltd	Course Booking	Full name, Personal email address, Business email address, Telephone/mobile number, Home address, Date of Birth, Payment Card Information, Qualifications, Details of criminal offences, Registration Body Number, Unique Learner Number,	UK	AccessPlanit Compliance	n/a

Coeo Ltd	Data Analysis & Reporting	Full name, Personal email address, Business email address, Telephone/mobile number, Home address, Date of Birth, Delivery address, Billing address, Business address, National Insurance number, Payment Card Information, Qualifications, Location data, Skills coach/tutor comments, Disability details, Health data	UK	Coeo Compliance	n/a
Barracuda Networks Ltd	Backup	Personal data contained in Microsoft office apps created by employees and stored in applicable cloud products.	UK	Barracuda Security, Compliance & Data Privacy	n/a
ESFA/DfE	ESFA/DfE Statutory returns	(Apprentices) Full Name, Address, Date of Birth, Ethnicity, Phone Number, Email address, NI Number, ULN, Next of Kin – name, phone number and relationship, Prior Attainment Level, Employer – name, address, contact details, Learning Difficulty or Disability, Gender, Unspent Criminal Convictions (Yes/No)	UK	ILR Privacy Notice 2025 to 2026	n/a
	Provider Data Self-Assessment (PDSAT) Reports	(Apprentices) Full Name, Address, Date of Birth, Ethnicity, Phone Number, Email address, NI Number, ULN, Next of Kin – name, phone number and relationship, Prior Attainment Level, Employer – name, address, contact details, Learning Difficulty or Disability, Gender, Unspent Criminal Convictions (Yes/No)			
	Managing & Creating ULNs	(Apprentices) Full Name, Postcode, Date of Birth, Email address, Gender, Unique Pupil Number, Universal Candidate Identifier			
	Apprentice Right to Work Checks for funding purposes for UK and non-UK nationals	(Apprentices) Passport number/ copy			

Oneadvanced Ltd (Pellcomp Software Ltd)	ESFA/DfE Statutory returns	(Apprentices) Full Name, Address, Date of Birth, Ethnicity, Phone Number, Email address, NI Number, ULN, Next of Kin – name, phone number and relationship, Prior Attainment Level, Employer – name, address, contact details, Learning Difficulty or Disability, Gender, Unspent Criminal Convictions (Yes/No)	Uk	oneAdvanced Privacy Notice	n/a
--	----------------------------	---	----	--	-----

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors. For example, we may share information about you with ESFA to claim funding.

6. Your Rights In Relation To This Processing

As an individual, you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority.

Some of these rights are 'absolute rights', meaning you can exercise these rights as and when you like. Others are 'qualified rights', meaning certain conditions must be met for you to exercise these rights, or we can apply specific exemptions to you being able to exercise these rights.

Right of Access (absolute): You have the right to obtain confirmation from FI as to whether personal data concerning you are being processed and, where that is the case, access to that data.

Right to Rectification (absolute): You have the right to oblige us to rectify inaccurate personal data concerning you. Considering the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.

Right to Erasure (Right to be Forgotten) (qualified): You have the right (under certain circumstances, but not all) to oblige us to erase personal data concerning you.

Right to Restriction of Processing (qualified): You have the right (under certain circumstances, but not all) to oblige us to restrict the processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.

Right to Data Portability (qualified): You have the right (under certain circumstances, but not all) to oblige us to provide you with the personal data about you in a structured, commonly used, and machine-readable format.

You also have a right to oblige us to transmit those data to another controller.

Right to Withdraw Consent (absolute): If the lawful basis for processing is consent, you have the right to withdraw that consent.

Right to Object to Direct Marketing (absolute): Where your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

Rights in Relation to Automated Decision-Making and Profiling (qualified): FI does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

If you wish to exercise any of your rights concerning your personal data, you should contact FI's Data Protection Officer at the address shown above. If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is Information Commissioner's Office:

Information Commissioner's Office
Telephone: 0303 123 1113
Email: casework@ico.org.uk
Web: https://ico.org.uk/for-the-public/
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details the "Contact Details" section above.

**** END OF DOCUMENTATION ****