

ICS Learn Group Data Protection and Privacy Policy

Updated January 2024.

ICS Learn Group is committed to protecting and respecting your privacy. This privacy policy describes the data processing activities the ICS Learn Group carries out in relation to the information from which you provide when using the ICS Learn Group websites listed at the end of this privacy policy or when enrolling and attending one of our courses.

This policy explains **who** we are, **what, when** and **why** we collect personal information, **how** we use it, the conditions under which we may disclose it to others and how we keep it secure.

Any questions regarding this policy and our privacy practices should be sent:

ICS Learn

studentservices@icslearn.co.uk

DPG

courses@dpglearn.co.uk

Acacia

courses@acacialearning.com

For enquiries within the EU our representative is:

Damien Bon

D.bon@skillandyou.com

Who are we?

We're ICS Learn Group, the world's most experienced distance learning organisation. Our aim is to make learning as accessible as possible in a way that lets you decide when, where and how you learn. The ICS Learn Group is comprised of the following brands: ICS Learn, DPG and Acacia Learning. You can find the full details of each Group Company at the end of this privacy policy.

How do we collect information about you?

Information is provided to the ICS Learn Group by:

1. Use and navigation of our websites
2. Filling out an enquiry form on any of the ICS Learn Group websites
3. Filling out an enquiry form for one of our courses on a third-party website, such as an awarding body, online job noticeboard website, or a generic course enquiry website, which is then automatically sent to us
4. Correspondence by phone, email or chat
5. Requests to join our social media channels such as Facebook, LinkedIn and Twitter

6. Information provided when contact is made with the Student Service team to report a problem, resolve a query or provide general system advice and support
7. Surveys to support continuous improvements in the student experience
8. Career development tools to support your continued learning
9. Completion of an Apprenticeship enrolment form
10. Any pre-enrolment diagnostic test that may be required

What information do you provide?

When you use our website but have not raised an enquiry, we'll collect the following information:

1. Technical Data: including your IP address, MAC (Media Access Control) address; unique identifier or other persistent or non-persistent device identifier; device software platform and firmware, mobile phone carrier and geolocation data and other technology on the devices you use to access our website.
2. Usage Data: which includes information such as: how and when you use our website, how you moved around it, what you searched for; website performance statistics, traffic, location, and other communication data.

When you submit your details to us through an enquiry on our website or when it is provided to us by a trusted third party, we'll collect the following information:

1. Identity Data: (Your full name)
2. Contact Data: (Your email address and telephone number)

When you speak to our course advisors or enrol on a course, we may ask for the following information:

1. Identity Data: Your full name, date of birth, copy of your identification (either passport or driving license)
2. Contact Data: Your email address, telephone number, postal address
3. CV Data: Your education and work experience, where relevant to the course
4. Financial Data: Payment information including credit card number and bank account details
5. Employment Data: Details of your employers name and address
6. Marketing and Communications Data: Your preferences in receiving marketing communications from us
7. Health Data: Where you provide us with this in case we need to make reasonable adjustments

If a third party is paying for your course then that third party will provide us with the following information about you:

1. Identity Data: Full name, date of birth

2. Contact Data: Email address, postal address
3. Financial Data: Payment information including credit card number and bank details (however this will be the Financial Data of the third party)

When you are studying, we may collect the following information about you:

1. Service queries or problems
2. Academic tutor queries
3. Coursework or assessments submissions
4. Student event or survey
5. Career development plans
6. Transactional Data: details of payments made

When you enrol as a student, we'll ask if you have any special educational requirements that might require us to make adjustments to the course or assessments. We ask this so that we can take reasonable steps to accommodate your needs and give you the best student experience possible. Any such health information is known as special category personal data under data protection laws. We may share this with our Awarding bodies so that they can take your requirements into consideration when setting assignments or exams.

This information will only be used to help you.

As with all your data, you can ask us to delete or modify this information at any time. Please see further information about your privacy rights below.

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so. Most commonly we will use your personal data in the following circumstances:

1. for the performance of our contract with you or to take steps at your request before entering into a contract;
2. for our legitimate interests or those of a third party; or where you have given consent;
3. to comply with our legal and regulatory obligations;

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our legal basis for doing so:

| Purpose / Activity | Type of data | Category of data subject | Lawful basis for processing including basis of legitimate interest |
|---|---|---|---|
| <ul style="list-style-type: none"> To register you as a new student To provide you with the course to you that you have enrolled in To manage our relationship with you Manage payments Collect and recover money owed to us To make reasonable adjustments | <ul style="list-style-type: none"> Identity Data Contact Data CV Data Financial Data: Employment Data Health Data | <ul style="list-style-type: none"> Students | <ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us) Comply with a legal obligation (to make reasonable adjustments) |
| <ul style="list-style-type: none"> To respond to enquiries and feedback | <ul style="list-style-type: none"> Identity Data Contact Data | <ul style="list-style-type: none"> Students Individuals who have submitted enquiries on a website | <ul style="list-style-type: none"> Necessary for our legitimate interests (engaging with potential students and identifying how we can improve our courses/services) |
| <ul style="list-style-type: none"> To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | <ul style="list-style-type: none"> Technical Data | <ul style="list-style-type: none"> Website users (including Students who use our website) | <ul style="list-style-type: none"> 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) Necessary to comply with a legal obligation |
| <ul style="list-style-type: none"> To select and deliver relevant website content and advertisements to you or to an audience that we want to target (which may include you) and measure or understand the effectiveness of the advertising we serve to you | <ul style="list-style-type: none"> Identity Data Contact Data Technical Data Usage Data | <ul style="list-style-type: none"> Website users Students | <ul style="list-style-type: none"> Necessary for our legitimate interests (to study how customers use our courses/services, to develop them, to grow our business and to inform our marketing strategy, to serve you with relevant ads and serve ads to our targeted audiences) |

| | | | |
|--|---|--|---|
| <ul style="list-style-type: none"> To send you updates about our services, including exclusive offers, promotions or new courses | <ul style="list-style-type: none"> Identity Data Contact Data | <ul style="list-style-type: none"> Students (current and previous) | <ul style="list-style-type: none"> Legitimate interests when you are a current or previous student and have not opted out (to develop our courses/services and grow our business) Consent (where you have consented to receive marketing) |
| <ul style="list-style-type: none"> To receive services from our suppliers and business partners and make payments for those services | <ul style="list-style-type: none"> Identity Data Contact Data | <ul style="list-style-type: none"> Business Contacts (agents, contractors and individuals that represent our suppliers and business partners) | <ul style="list-style-type: none"> Performance of a contract with our suppliers and business partners |
| <ul style="list-style-type: none"> To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | <ul style="list-style-type: none"> Technical Data Usage Data | <ul style="list-style-type: none"> Website users (including Students who use our website) | <ul style="list-style-type: none"> Necessary for our legitimate interests (to define types of customers for our courses and to understand how our website is used, keep our website relevant and updated, develop our business and to inform our marketing strategy) |

Job Applications: We collect personal information in the context of processing job applications as necessary to comply with our legal and regulatory obligations to ensure that our application processes comply with applicable laws, and also for our legitimate interests to ensure that candidates are appropriately qualified and suitable for working with us. Such processing may also be necessary for us to take steps before entering into an employment contract with a candidate.

How do we use your personal information for marketing and advertising purposes?

If you are an existing student and you have not opted out of receiving marketing (in accordance with your preferences), or if you have consented to receive marketing communications, we may send you marketing communications by phone and email including information on any offers about our courses that we believe may be of interest to you. We may use your personal information to form a view on what we think you may like, or what may be of interest to you and send you details of courses or offers on courses which may be relevant for you.

We also use online advertising to select and serve relevant adverts to you or serve ads to the audience that we want to target, which may include you. We may share

your personal information with the companies that we work with to serve the ads (information is anonymised beforehand and may be aggregated). Like many other companies, we may target ads to you when you use other websites and apps. We do this using a variety of different services offered by social media companies including META's Custom Audience Service. Before sharing your personal information we will screen your details against our marketing opt out list.

How to unsubscribe from marketing communications

To opt out of our emails or other marketing communications, click the 'unsubscribe' button at the bottom of any email or text "STOP" in response to any marketing text message we send you.

To opt out of us sharing details with Facebook that you have submitted through our website or as part of your enrolment process, email the relevant ICS Learn Group entity that delivered your course to you: marketing@icslearn.co.uk; or courses@acacialearning.com; or contact@dpglearn.co.uk.

How long do we keep your data?

If you submit your details as a prospective student, we'll store this data for 3 years.

If you enrol as a student, we'll store your data for 7 years after the completion of your course in line with regulatory and governing body requirements, where there may be a requirement to hold your data to evidence the completion of your studies or for audit purposes.

Technical information about your visit to our website may be kept for the following retention periods:

1. Google unique visitor tracking - 2 years.
2. Google analytics session - 30 minutes.
3. Google referral - 6 months.

For more information about how long we keep your data, please contact us at the details above.

How do we keep your data secure?

We take your privacy and security very seriously and take appropriate measures to ensure that your data is protected from misuse.

We have an ongoing programme of improvement and development in order to protect your personal data from unauthorised access, accidental loss and/or destruction.

We use the following security measures to protect your data:

1. Industry standard secure sockets layer (SSL) technology, to protect personal information, as well as the use of specific logins and secure passwords
2. Our web servers and database servers are held in a securely managed data centre and are further protected with a personal firewall and inherent security layers
3. firewalls, anti-virus, secure file transfers as used where required
4. encryption of emails is used where required
5. office security
6. access to personal data is granted on an "as-needed" basis
7. an incident and disaster recovery protocol framework is in place to help us manage any data security breaches

Please be aware that communications over the internet, such as e-mails/instant messaging, are not secure unless they have been encrypted. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Who do we share your data with?

In order to provide and improve our services, we may share relevant information with the following third parties. All of our third parties are trusted and take appropriate measures to ensure your data is secure.

- Contracted Apprenticeship Partners
- Awarding Bodies
- Examination and workshop Venues
- National Apprenticeship Service for Apprenticeships
- Tutors and assessors who are classified not employees of ICS Learn
- Refer a friend partners
- Career Hub service providers
- Companies that deliver adverts such as social media companies and other website owners

We may also share your information if:

1. It's necessary to enforce our Terms & Conditions or other policies
2. It's necessary to protect our rights, property, employees or students
3. It's necessary to protect ourselves or others against fraud or credit risk
4. We're required to by law
5. You've given us your consent to pass your details to additional third parties

Coursework and assessment submissions will only be shared securely based on the terms of the student agreement; for example, with a designated person or department in the relevant Awarding Organisation.

Technical information gathered about your use of our website may be shared with Google Analytics. We work with Google Analytics to automatically collect technical information as described in the 'What information do you provide?' section to help us understand your use of our website such as how often you return, what parts of the website you visit, how you use the website and how long you spend on the website. This third party provider is prohibited from using your data for any other purposes. Go to <https://www.google.com/analytics/terms/us.html> to read the Google Analytics Privacy Policy.

Transferring your data to a different country

This is relevant as countries outside the EEA and UK are not bound by the same data protection regulations as those within the EEA and UK.

The European Economic Area (EEA) includes the EU member states plus Iceland, Norway, and Liechtenstein, and is covered by the General Data Protection Regulations (GDPR).

Your data might be shared with the non-EEA or UK companies in the US or other non-adequate territories that are contracted to provide a service to us. We trust these companies with your data because they've ensured that their data protection measures are at least as extensive as those required within the EEA and UK by GDPR.

If you are a student residing in Asia or the Middle East, your personal data may be processed by an ICS Learn Group company in the UK in order that services can be provided to you.

Your rights regarding your personal data

Under data protection laws, you have many rights regarding your personal data which may generally be exercised free of charge. These include the right to:

1. **fair processing** of information and transparency over how we use your use personal data (as contained in this policy)
2. **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. We will respond in one month or such longer time as data protection laws allow us to do so.
3. **require us to correct mistakes** in your information which we hold
4. **require us to delete** your personal information in certain situations. You should be aware that we may not be able to delete your personal data if there is a legitimate reason for us to continue to hold your data; for example, we may

continue to hold personal data where we are under a legal obligation to do so, or where such information may need to be used by us in the exercise or defence of any legal claim.

5. **request the transfer** of the personal information you've provided to us in a structured, commonly-used and machine-readable format. We will provide you or a third party with your personal data in the commonly-used and machine-readable format.
6. **object at any time** to processing of personal information concerning you for direct marketing
7. **object to decisions being taken by automated means** which produce legal effects concerning you or similarly significantly affect you
8. **object in certain situations to our continued processing** of your personal information
9. **otherwise restrict our processing** of your personal information in certain circumstances
10. **claim compensation for damages** caused by our breach of any data protection laws

For full information on your rights, including how and when they apply, please contact us or seek [guidance from the ICO](#).

You can exercise any of these rights by emailing the relevant ICS Learn Group entity on: studentservices@icslearn.co.uk, or contact@dpglearn.co.uk; or courses@acacialearning.com or by calling or writing the relevant ICS Learn Group entity on the details set out in the introduction section of this privacy notice.

How to make a complaint

We'll do our best to resolve any complaint or question you have about the data you store with us.

If you believe we've breached data protection laws, you have the right to lodge a complaint with the relevant supervisory body where you work, live, or where the alleged breach occurred.

In the UK, this is the ICO, which can be reached [here](#) or by phone on 0303 123 1111.

How and when we may change this policy

We will keep this policy under review and any changes made from time to time will be posted on this page.

Please check back regularly to keep informed of updates or changes to this privacy statement. We will notify any significant changes via an announcement on our website.

ICS Learn Group list of websites

ICS Learn

<https://www.icslearn.co.uk/>

<https://icslearn.ie/>

<https://www.icslearn.ae/>

<https://www.icslearn.qa/>

<https://www.icslearn.my/>

<https://www.icslearn.hk/>

<https://www.icslearn.sg/>

<https://www.icslearn.sa.com/>

<https://www.icslearn.com.kw/>

DPG Learn

<https://dpglearn.co.uk/>

Acacia Learning

<https://acacialearning.com/>

<https://acacialearning.com/sa/>

<https://acacialearning.com/ae/>

ICS Learn Group

<https://icslearngroup.com/>

ICS Learn Group Companies

The ICS Learn Group companies include:

International Correspondence Schools Limited (trading as ICS Learn)

Registered office address: 7 West Nile St, Glasgow G1 2PR.

Registered number: SC434382

Registered as a data controller with the UK Information Commissioner's Office (ICO) under registration number Z3410565

ICS Learn Services FZ-LLC

Registered office address: Dubai Knowledge Park, Block 2B, Office 136, Dubai, UAE

Registered number: 98844

DPG Limited (trading as DPG Learn)

Registered office address: 3rd Floor, Ashley Road, Altrincham, WA14 2D

Registered number: 02708805

Registered as a data controller with the UK Information Commissioner's Office (ICO) under registration number: ZB536676.

Acacia Learning Limited

Registered office address: 3rd Floor, Ashley Road, Altrincham, WA14 2DT

Registered number: 06215722

Registered as a data controller with the UK Information Commissioner's Office (ICO) under registration number: Z3471831

**Saudi Acacia for
Business Services
Company LLC**

Registered office address: Al Ihsaa, Az Zahra, Riyadh 12815, Saudi Arabia.

Registered number: 1010691083