

Privacy Notice – Clients (Novus Gower Curriculum Services)

1. Introduction

This Privacy Notice explains how we use personal data for the purpose of providing clients with our curriculum services (for example, Hair & Barbering salons), our lawful bases for processing, relevant retention periods, and how you can exercise your privacy rights.

This Privacy Notice provides information which is in addition to any relevant photography and film privacy notices, consent forms and signage which may have been in place at the time the service was received, if photography / filming took place.

2. What is the purpose of this document?

Novus and its subsidiaries such as Novus Cambria, Novus Gower and Novus Transforming Lives (“**we**”, “**our**”, “**us**”), are committed to protecting the privacy and security of your personal information (“**personal data**”). This Privacy Notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the “**GDPR**”), together with other UK data protection laws.

Our Data Protection Policy, as well as more information on how we process personal data, can be found at: <https://www.novusgower.ac.uk/data-protection/> / <https://www.novus.ac.uk/dataprotection>.

You can also contact our Data Protection Officer at dpo@ltegroup.co.uk if you have any questions.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using your personal data and what your legal rights are in relation to it.

3. The kind of information we hold about you

Personal data, or personal information, means any information from which an individual person can be identified. It does not include data where the identity has been removed (anonymous data).

Some of the personal data we may collect about you is classed as being 'special category personal data'^{1*}, for example any of your physical information which is relevant to the service we are providing. Access to and sharing of this information is controlled very carefully.

The categories of personal information that we **may** collect, store, and use about you may include:

	Client
Full Name	✓
Contact Details (e.g. tel no, email address)	✓
Date of Birth/Age	✓
Relevant physical/health information*	✓
Photographs	✓
Audio Recordings	✓
Payment Details	✓

4. How is your personal information collected?

We typically collect personal information about you upon our first contact with you, when you initially book our services and during any relevant consultations prior to you receiving those service(s). We may collect additional personal information whilst you use our services - for example in person, via email or telephone.

5. How will we use information about you?

Client personal data will be used for the purpose of delivering and tailoring our curriculum service(s) to you as a client, and to enable our students to study towards their qualifications and build their portfolios.

From time to time, photographs and videos are taken on site for marketing, educational and promotional purposes. These images could be used in print and digital media formats including, publications, websites, e-marketing, poster banners, advertising, film, social media, teaching and research purposes, etc. We do this to help showcase the work we do as an education provider and to support what our students are achieving.

Do we need your consent?

We do not generally process your personal data based upon your consent as we usually rely on another lawful basis. Where and if we do process your personal information based on your consent, we will inform you of this before we start the processing and you will have the right to withdraw your consent at any time.

6. If information is not provided

If you fail to provide certain information when requested, we may not be able to deliver our services to you.

7. Our lawful bases for processing

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

Lawful Basis	
Contract	<ul style="list-style-type: none">To be able to provide you with our services as a client, in line with any applicable terms and conditions
Legitimate interests	<ul style="list-style-type: none">We have a legitimate interest to be able to promote LTE Group using photography / videography, as explained aboveWe make every effort to ensure you are aware when photography / filming is taking place and to minimise any privacy impact
Consent	<ul style="list-style-type: none">Where appropriate, we may seek your consent to photograph / film / record youThis will be done via your customer form or with specific consent forms, either electronic or paper-basedYou can opt out of photography / filming as explained below.

8. How do I know if photography or audio recordings are taking place?

Wherever possible, we will ensure you know when photography, videography or audio recordings are taking place in the following ways:

- For events, advance notice of our intention to photograph / film / record at events within booking forms, invitations, information etc.
- Comprehensive signage at prominent locations, including entry and exit points
- Notifying you in person when obtaining your consent is relevant.

Withdrawing your consent or opting out

If we have collected your consent or you wish to opt out post-event, once photography / filming has taken place you can withdraw your consent / opt out by letting a member of our team know or by contacting dpo@ltegroup.co.uk, stating: your name, the service you attended and date. Where we are unable to identify you, we may have to ask you to provide a recent photograph to assist us to complete the deletion. This will also be securely disposed of once disposal of photography / film has taken place.

Please note, although we will stop using your image in current publications we continue to control and in any future publications, we will not be able to remove any existing printed copies or material which has already been published and is out in the public domain. This may also include any images already shared with our awarding organisations or event partners (where relevant). Withdrawing your consent / opting out will not affect the lawfulness of any processing we conducted prior to your withdrawal.

9. Your duty to inform us of changes

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

10. Change of purpose

We will only use your personal information for the purposes for which it was originally collected, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

11. Data sharing

We may share your personal data with third parties such as awarding organisations as portfolio evidence for our students, or with our trusted event partners or third-party technology providers.

Any consent form obtained for photography will not be shared, however any images and film we take will likely be placed into the public domain. This includes within our internal and external publications, printed media, prospectuses, on our websites, social media accounts and other public domain advertising, and within adverts placed with specific third parties, (e.g. Google, Facebook and Instagram).

As such, published photographs / film are available to anyone who has access to the website, social media channels or printed materials etc in which the photo or video features.

Original photographs, videos or audio recordings will only be accessible by approved students, employees and agents of LTE Group, or third parties that process data on our behalf (e.g. printing providers, digital asset management suppliers).

12. How long will you use my information for?

We will only retain your personal information for as long as needed. We have a **Data Retention Schedule** which outlines how long we keep information.

Where we have collected your consent to use your image, the consent form used will have a specific retention period (typically three years), after which we will dispose of the photography / film or seek to refresh your consent. We will do this using the contact information provided within the Client Registration Card or consent form.

Where such a consent form has not been used, we will use and retain photography / film for a period of five years from the date of the event, at which point we will dispose of the photography / film. Please note that after deletion the information may still appear in materials already in circulation prior to this date.

Where images have been shared with our event partners, their own retention periods may also apply.

Further information is available on request from dpo@ltegroup.co.uk, or by writing to the address shown in section 16.

13. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not intend to take any decisions about you in this way. We will notify you in writing if this changes.

14. Data security

We have measures in place to help protect your information. Only authorised parties who have a legitimate need to know can access it.

Your data will be stored in the UK only.

We have procedures to deal with any suspected personal data security breach. We will notify you of a suspected breach where we are legally required to do so.

15. Your individual rights in connection with personal data

By law, you have the right to request:

- **Access** to your personal information (known as the Right of Access/a Subject Access Request)
- **Correction** of the personal information we hold about you if it is inaccurate
- **Erasure/Deletion** of your personal information (in certain circumstances)
- **Restriction** of processing of your personal information
- **Transfer** of your personal information to another party
- To be **Informed** about the processing your personal information
- **Objection** to processing of your personal information
- **Suspension** of processing of your personal information

If you wish to make any requests regarding your personal data, please speak with any member of the department, or contact the Data Protection Office at dpo@ltegroup.co.uk. If you make a request, we may need specific information from you or your representative, to confirm your identity.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>).

16. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

LTE Group Data Protection Officer
Whitworth House
Ashton Old Road
Manchester
M11 2WH

Email: dpo@ltegroup.co.uk

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

Information Commissioner's Office - Wales

2nd Floor,
Churchill House
Churchill Way
Cardiff CF10 2HH

Tel: 0330 414 6421

<https://ico.org.uk/about-the-ico/who-we-are/wales-office/>

Your representative can also contact the ICO via: wales@ico.org.uk