



External Privacy Notice

GDPR



Geason House | 145 North Street
Glasgow | G3 7DA
www.geasontraining.co.uk | 0330 088 9596

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Privacy Notice

1. Our Details

We are committed to safeguarding the privacy of our website visitors and service users.

Any reference to "we" or "us" or "Geason" means Geason Apprenticeships Limited, which is a private limited company with registered company number 10839074 or, where applicable, our group companies

(which include our holding companies and all subsidiary companies within our group). Our registered office address is Chase House, 16 The Parks, Newton Le Willows, Merseyside, United Kingdom, WA12 0JQ.

This privacy notice (together with our website [terms of use](#) and our [cookies policy](#) and any other documents referred to in them) sets out the basis on which we collect information from you and how we use information which we collect or which you provide to us. This includes information which we collect or that you provide manually or via our website <http://www.geasontraining.co.uk> or other online services and platforms (together, our "Site").

If you have any questions regarding how we use your information or you wish to exercise any of your rights in relation to your information (as set out in paragraph 9 below), please contact our Data Manager at privacy@geason.co.uk or at Geason Training, 145 North Street, Glasgow G3 7DA.

2. What information do we collect and when?

We only collect information that we will use for the purposes set out in this notice.

» Information you submit to us:
Specifically, we collect:

Through forms, for example such as by filling in our 'Contact Us', 'Request a Call Back' or 'Request a Catalogue' forms on our Site;

By sending us emails and text messages;

By adding posts, reviews and other comments to our Site;

By interacting with us on social media platforms;

By speaking to us in our depots or over the telephone, for example in making an enquiry or a complaint about a product you have purchased; or

By applying for or registering accounts with us. This includes setting up passwords and preferred user names, contact details, account details, your preferences and interests.

By applying for a job with us or registering your interest in doing so, either directly with us or via a third party recruitment agent.

By purchasing, holding or transferring shares in our group companies and related transactions.

Please note: If you submit details to us of any other person (e.g. a colleague), please make sure you have their permission before doing so.

» Information we collect about you:

Full details of the purchases you make from us, including the time and date of purchase, the products and services you purchase from us, any relevant delivery address(es) and details of any relevant payment cards or bank account details.

Information on what you search for, view, click on and access in and through our Site and our marketing communications. We do this through the use of cookies. Our cookies policy gives you more detailed information on how we use cookies and the information we collect. This includes information on how to manage cookies.

Technical information about the devices you use to access our Site. We collect each device's unique identifying code (MAC address), relevant IP address, operating system and version, web browser and version, and geographic location.

Your social media content (where this is in the public domain) and any messages you send us via social media. This information can include posts, comments, pictures and video footage.

CCTV images This information may include images of you from CCTV cameras installed externally and internally at our sites. We use this information for the purposes of public safety and the prevention of fraud and other criminal activity.

Basic background information on you available from government sources. We use the Driver Vehicle Licensing Agency to trace number plates and owners in the event of drive-offs from our sites.

Information from banking, credit card and credit reference agencies about your financial status and the status of any payment card presented to us (for example, if it has been reported stolen) to check we are likely to be paid for any transaction and to reduce the risk of fraud.

Information collected independently by online advertising networks (for example Google) through which we place advertisements. The information we obtain varies from network to network. It often summarises the actions of lots of people, in which case it does not enable us to identify you individually. It relates to what you view, click on, and access through websites in their network, including the subject matter of the website you started at and where you subsequently go. It may also include their analysis of your behaviour across the wider internet and a profile of you. If you are unhappy about this happening you should look out for "settings" and "Do Not Track" options in online advertisements and in the privacy and cookies functionality on your devices and consider changing your settings to block third party cookies in particular. We do not control the information about you that such networks obtain, or the technology they use to do so.

Information about your shareholdings in our group companies. This includes details of your shareholdings, registration details, dividend payments and other information required for regulatory and corporate governance purposes.

Information about you for the purposes of processing your job application or registering your interest in a job with us. This includes including your name, contact details (i.e. address, home and mobile phone numbers, email address), details of your job application (including the application itself, your qualifications, experience and references and employment history, including details of current salary and benefits).

3. How do we use your information?

We use the information we collect for the following purposes:

- » **To provide you with our Site**, which requires a certain amount of technical information to be collected in order to work properly.
- » **To power security measures and related services relating to your access to our Site** for example, to enable us to recognise your username and password for your account and reset these if you forget them.
- » **To enable you to order training, products and services from us and to provide you with those training, products and services**, which again requires a certain amount of information to be collected, for example, payment card or bank account details so we can take payment and details of the equipment, products or services you hire or buy so we can process your order, keep necessary records and provide you with a receipt.
- » **To enable us to run competitions and offers**, about which we need to be able to communicate with you.
- » **To gather feedback from you** about our Site, our products, our services and activities from time to time. We may invite you to provide this feedback on occasion, for example by emailing you to ask if you would like to review training you have received. We may use independent research and feedback providers to do so on our behalf.
- » **To contact you from time to time about things you have told us you want to hear about**, for example our products, services, news, offers, new competitions and sponsored events.
- » **To respond to any questions, suggestions, issues or complaints you have raised with us.**
- » **To respond to any social media posts or other public comments you make where these are made to or about us**, our Site and our products, services or other activities.
- » **To communicate with you about operational changes to our Site**, our products and our services, for example changes to our product list.
- » **To perform any contract we have entered into with you** but also to enforce a contract against you if you do not honour it, including seeking to collect any debts that you may owe us and instructing third parties to support us in doing so.
- » **To gather statistics about how you and other people use our Site** and what you think of our adverts, offers, news, product information, competitions and other digital content. We then analyse these statistics to understand if these things meet most people's needs, or if they should be improved, and if so, what design or other changes (for example, around the nature and timing of communications) would be most beneficial for our customers and our business.
- » **To check that you have or are likely to have the means to pay us** for any products or services you have ordered from us.
- » **To monitor use of our Site to see if it is being abused or threatened**, for example by people posting inappropriate comments in review areas or by potential hackers attempting to undermine our security measures.
- » **To protect you and our business against any other criminal behaviour**, including identity theft and fraud.
- » **To maintain administrative and legal records about our business** to enable us to understand what we have sold, how, when, where and at what price and account to HM Revenue & Customs for the related taxes that we have to pay.
- » **To enable us and our third party service providers to plan and manage our day-to-day business and related services as effectively as possible**, for example in predicting likely sales volumes for

each of our products and services, so we can try and make sure we have enough stock and resource to meet likely demand.

- » **To enable us to understand our customer and user base.** We do this by combining your information with information about our other customers and users of our Site so we can spot trends and common factors. We can then further tailor our business approach and in particular our marketing communications, products and services to the things we think you and other people or businesses like you and your business would be most interested in.
- » **To enable us to conduct focused market research** based on trends that we identify, which we can then use to further improve our products and services for all our customers.
- » **In the process of anonymising your information** so that you are no longer identifiable to us.
- » **To test new systems and processes** as we roll them out to make sure they work and will meet the high expectations we set for ourselves.
- » **To assist us in the development of new products and services over time**, for example to gauge whether a new product is likely to appeal to a large proportion of our customer base.
- » **To analyse whether the money we spend on advertising** on TV, billboards, online and in search engines represents good value.
- » **To comply with tax, legal, regulatory and corporate governance obligations** in relation to your shareholdings.
- » **To contact you in relation to jobs that may be of interest to you and/or to assess your suitability for a particular role** and to comply with legal, regulatory and corporate governance obligations and good employment practice.

We do so in part by matching information common to the various different sources of information we have about you, to build a bigger, richer picture. So for example, if you sign up to a competition and provide your email address, and then register for an online account with us using the same email address, we may link those two pieces of information together. We can achieve the same effect through matching transaction details and technical information about the electronic devices you use. By doing so, we can understand you better and provide a better experience to you, as we set out above.

4. Legal basis for using your information

In accordance with data protection law, we are obliged to inform you that we are using your information as described in this policy on one or more of the following legal bases:

- » you have given your consent to us using your information as described in this notice;
- » the use is necessary to perform a contract between us or to take steps which you requested us to take before entering into a contract;
- » the use is necessary to comply with a legal obligation to which we are subject;
- » the use is necessary to save your life or that of another individual;
- » the use is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority; and
- » the use is necessary for the purposes of our legitimate interests, including direct marketing, fraud prevention or preventing crime and protecting public security.

5. Use of your sensitive personal information

We may on occasion collect sensitive personal information about you. By way of example, information about your racial or ethnic origin may be included within the identification information you provide to us as part of, training or funding provider requirements, our account opening process and/or we may check and record your identification information during our verification process on course attendance.

We will use this sensitive personal information for the purposes of identifying individuals to combat fraud and other criminal activity and also to provide it to government bodies and other related parties to support funding applications for training and/or the provision of training. We will also share this sensitive personal information with the police and our insurers and other organisations that provide similar products and services to ours for the purpose of fraud and crime prevention.

6. Who do we share your information with?

We cannot run our business or provide many of our services and benefits without involving other people and businesses and sometimes we pass your information to these other people and businesses as set out below. We only share your information where we can do so in accordance with our legal data protection and privacy obligations. We share the information we collect with:

- » Our different business units that have relationships with our customers and users. We do so because we hope to have a relationship with you across our different business units and we want to be able to provide you with the same value and high quality of experience.
- » Other people and businesses who help us provide our Site and related services to you, for example, information technology companies who host and/or maintain our Site and payment services companies who enable you to use payment cards with us.
- » Analytics and search engine providers who assist us in the improvement and optimisation of our Site.
- » Our insurers and insurance brokers where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.
- » Credit reference agencies who provide anti-fraud and credit score information to us, central and local government departments, for example the Driver Vehicle Licensing Agency (DVLA), funding bodies and local authorities who run the UK electoral rolls, banks and finance companies who also provide anti-fraud services and customer insight companies (as set out above), in each case as necessary in order to benefit from their services. Where we do so for anti-fraud purposes, the recipient organisation may hold your information on file for the purpose of their fraud prevention services in future. We may also share your information, including late payment information, with credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.
- » Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- » The prospective buyer of any part of our business or assets that we may sell.
- » Our professional advisers for example our lawyers, accountants and technology consultants when they need it to provide advice to us.
- » Our registrars in relation to the administration of our shareholdings, including updating the share registers and managing dividend payments.
- » The police, local authorities, HM Revenue & Customs (HMRC), the courts and any other central or local government bodies where they request it and/or where we may lawfully disclose it, for example for the prevention and detection of crime.
- » Other people who make a subject access request to us, where we are allowed to do so by law (see Managing Your Information below for what we mean by a subject access request).

We may also share the information we collect where we are legally able to do so, for example, to comply with a court order.

7. International transfer of your business information

Although we are based in the UK, we occasionally need to use international suppliers or transfer information to our international business to help ensure you receive the very best products and services from us. To allow us to run our business on this basis, the information we collect may be transferred to other countries where this is necessary for the purposes of our contract with you or in anticipation of a contract (for example, in relation to obtaining a quotation). Where this includes transfers to countries outside of the EEA, we will ensure that we have appropriate contractual arrangements in place to protect your data.

8. How long do we keep your information for?

In accordance with our legal data protection and privacy obligations, we will only retain your information for as long as is necessary for the purpose for which it was collected.

We will then either securely delete it or anonymise it so that it cannot be linked back to you.

See How do we use your information? in paragraph 3 above for full details of those purposes.

9. Managing your information

You can contact us with any queries about how we use your information at any time by contacting our Data Manager at privacy@geason.co.uk or at Geason, 145 North Street, Glasgow G3 7DA.

It is very important to us that all the information we hold about you remains accurate and up to date to reduce the risk of a misunderstanding.

We need your help in doing so. If you have an online account, where relevant, with us which you manage directly, please ensure that the information (for example, contact information) you provide to us through that account remains accurate and up to date. Please review and update it regularly.

You have a number of rights which we respect and aim to uphold in everything we do. These rights are set out below.

We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or harmful to the rights of others.

a) Asking us about your information You have the right to ask us whether we hold information about you and, if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a subject access request. If you would like to make a subject access request, please do so in writing to the address above.

b) Correcting inaccurate information If you have reason to believe any of the information we collect on you may be inaccurate or incomplete, and you cannot correct such inaccuracy or omission yourself through your account with us, please contact us with your queries and/or with the updated information.

c) Erasing information You have the right to require us to erase your information in the following circumstances:

- » the information is no longer necessary for the purposes for which we collected it;
- » we need your consent to use the information and you withdraw your consent;
- » you object to us using your information: (1) for the performance of a task carried out in the public interest; or (2) for the purposes of our legitimate interests (e.g. direct marketing) and there are no overriding legitimate grounds for the processing;
- » you unsubscribe from our marketing communications;
- » we have used your information unlawfully; and
- » the information must be erased for compliance with a legal obligation to which we are subject.

d) Restricting processing You have the right to require us to restrict our use of your information where one of the following applies:

- » while we verify the accuracy of the information that we hold about where you contest the accuracy of the same;
- » we have used your information unlawfully, but you request us to restrict its use instead of erasing it;
- » we no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
- » while we check whether our legitimate grounds override your right to object where you have objected to us using your information.

e) Right to object Where we are using your information on the basis of public interest or our legitimate interests (see paragraph 4), you have the right to object to this at any time by contacting us using the contact details set out below.

f) Withdrawal of consent Where you have given your consent to us using your information (e.g. for marketing purposes), you have the right to alter your preferences or withdraw this consent at any time by contacting us using the contact details set out below or, where applicable, through managing your preferences through your online account with us or clicking the 'unsubscribe' link (where relevant). This will not affect the lawfulness of any use of your information that we make before you amend your preferences or withdraw your consent.

If you have any questions or complaints about our use of your information, please contact our Data Manager at privacy@geason.co.uk or at Geason , 145 North Street, Glasgow G3 7DA.

We hope that our Data Manager can resolve any query or concern you raise about our use of your information but you can also contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.