

Key Performance Training GDPR & Privacy Policy



The purpose of the policy

This is our GDPR and Privacy Policy. It sets out how we collect, use and share your information, describes your rights and explains how you exercise them.

This provides guidelines and measures on how we do that and how we meet regulatory requirements.

We sometimes make changes to our GDPR & Privacy Policy to make sure it's up to date, so come back for a read every now and then.

Before we get started, here's a few things to help you understand our GDPR and Privacy Policy.

Who 'you' are

Where we talk about 'you' or 'your', we mean the person whose information we are using. That might be because you:

- are a current, past or prospective Key Performance Training customer
- are thinking about buying our products or services, or we consider you might be interested in buying our products and services
- visit any of our websites
- have a business relationship with us, (for example, you might work for a supplier, be a public official, member of the press or other media outlet, or work for a regulatory body or trade association).

Who 'we' are

Where we talk about 'Key Performance Training' or 'us', we mean Key Performance Training Limited. Key Performance Training is a controller of your information in all of the circumstances explained in our GDPR and Privacy Policy unless we specifically state that some other organisation is a controller. Our contact details are in section "How to contact us" at the bottom of this GDPR and Privacy Policy. You can raise a complaint about how your information is being handled there.

How we use your information

We respect your information and only use it for proper and/or lawful purposes to:

1. Help us design and develop our products, networks, services and offers, and to improve your experience with us

We rely on Consent or the Legitimate Interests Legal Basis to use your information for these purposes (improving our products, services and offers and the experience of our prospective and actual customers are our legitimate interests).

- We seek feedback from you, for example via surveys, to capture your thoughts and opinions on our products, services and your general experience with us.
- We monitor, record, store and use the communications we have directly with you about your account to improve the quality of our customer service and/or for training, operational and compliance purposes.

Key Performance Training GDPR & Privacy Policy

- We carry out market research to understand what consumers want. Using third-party market research companies to carry out these activities on our behalf.
- We use information about you and how you're engaging with us (including via our website), your products and services and relationship with us and combine this with other information we obtain from public sources and other organisations to create profiles to develop our products, services and offers, to improve your experience with us and identify other potential customers. Further information about our use of profiles is below.
- We use information about how you're engaging with us (including via our website), your products and services, relationship with us and combine this with other information we obtain from public sources and other organisations to create profiles which include your interests, preferences and lifestyle to personalise our offers, communications and your experience with us. Further information about our use of profiles is below.
- We use information when you visit our websites collected by cookies and similar technologies to give you a better, more enjoyable online experience. Further details about how we use cookies and similar technologies and what choices and rights you have can be found <https://keyperformancetraining.co.uk/privacy-policy/>
- If you use social media platforms to contact us, we'll use information you provide to investigate, contact and resolve any issues or queries you tell us about.
- We use information on UK households from third parties that collate and analyse information from public registers and statistical social-economic data to gain local area insights and to review and increase the number of areas in which we can provide our services. Further information about our use of profiles is below.

2. Tell you about our products and services, using different types of sales and marketing activities. This includes letting you know about all the benefits that come with being a Key Performance Training customer and offers from us.

We rely on Consent or the Legitimate Interests Legal Basis to use your information for these purposes (ensuring our customers are aware of and have access to our products and services and growing our business are our legitimate interests).

- We use information about you and how you're engaging with us (including via our website), your products and services, relationship with us and combine this with other information we obtain from public sources and other organisations to create profiles which include your interests, preferences and lifestyle to recommend more appropriate products and services, target our sales and marketing activities to you and personalise our offers and communications to you.
- We'll contact you to tell you about the latest upgrades and offers, products and services from Key Performance Training where you've consented to hearing from us or if it is in our legitimate interest such as when we're following up on your previous enquiry or if you are a prospective customer. We make contact by phone, SMS, email, post or online, including social media messaging.
- If you've consented to our advertising cookies, we may serve you targeted adverts on other websites and social media platforms based on the interests you've shown in our products and services when visiting our websites.

Key Performance Training GDPR & Privacy Policy

3. Manage your account, enter into contracts for our products and services and to perform our obligations to you and ensure we deliver the best service

We rely on Consent, Contract Performance or Legitimate Interests Legal Bases to use your information for these purposes.

- We use information about where you live to check our services are available in your area.
- To set up your account and make sure appropriate security controls are in place to manage access and changes to the account, we'll use information about who you are and information about your account.
- To prepare and send invoices to you, we use information about who you are and your use of our products and services.
- We'll use information about who you are, your contact details, where you live, your products and services and relationship with us to resolve any technical or service issues and any disputes or complaints you might have, to enable you to be notified of anything that impacts on your products or services.

4. To make sure we comply with our legal and regulatory obligations

We rely on Legal Obligation and Legitimate Interests Legal Bases to use your information to ensure we comply with our legal and regulatory obligations (these are our legitimate interests).

- We use information about who you are and your use of our products and services to respond to court proceedings and enforcement authorities, and help authorities and industry organisations with any security, fraud, anti-piracy, crime or anti-terrorism enquiries. We may provide information about you and your use of our products and services.
- Information collected during your enrolment will be used to progress your application and will be passed internally for tasks relating to this. We have a statutory requirement to share this information with the local authority, previous education providers and youth offending teams to ensure you are properly supported throughout your studies.
- We may also wish to share your information with other organisations that are supportive of our aims and objectives. In these cases, you will be asked for your consent to do this when we collect your information.
- We may also need to disclose your information if required by law.
- Your information may be shared with third parties for education, training, employment and wellbeing related purposes including for research. This information will only be shared as the law allows and in accordance with Data Protection/GDPR legislation.
- To demonstrate compliance with anti-money laundering rules
- To adhere to other regulatory requirements linked with treating customers fairly and processing records properly.
- We use information about disability and vulnerability needs to make sure we're providing the appropriate support.

Key Performance Training GDPR & Privacy Policy

- To respond to or cooperate with our regulators and other enforcement authorities or industry associations
- We use information about who you are and your health to support the management of public health situations

5. To develop, manage and protect our business

We rely on the Legitimate Interest Legal Basis to use your information for these purposes (developing, managing and protecting our business are our legitimate interests).

- We use information about who you are, your interests, products and services and your relationship with us to produce internal reports, data models and other insights to track and support the performance of our business, the development and design of commercial and marketing strategies and financial budgeting and forecasting
- We review customer accounts for possible fraudulent activity and provide information to fraud prevention agencies about customer accounts we suspect are fraudulent
- To identify and prevent crime
- We use information about who you are, your contact details and your relationship with Key Performance Training to recover unpaid debts on your account. We use suppliers to help us recover money owed to us and share your information with those suppliers for this purpose
- To protect Key Performance Training's revenue
- To manage our relationships with regulators and accreditation bodies like Ofsted, FAA, RTITB, etc
- To support potential or actual mergers and acquisitions (or other corporate restructures), securitisations and bond offerings (or other financial vehicles or offerings)
- To bring or defend legal claims
- To identify people that have similar interests and behaviours as yours, to target them with special offers and promotions.

Certain scenarios where we think you might want more detail about how we use your information

We use profile information to help us develop our business, for marketing purposes and to personalise your experience with Key Performance Training.

We use information we collect from you directly and through your use of our products, networks and services and, in some cases, combined with information we collect from other sources, such as data brokers, to create a profile of you or to place you into groups or segments. These profiles are used:

- to help us develop our commercial and marketing strategies, financial budgeting and forecasting activities. We use your information in this way relying on the Legitimate Interests Legal Basis (managing and developing our business are our legitimate interests).
- to design personalised offers and communications that are most relevant to you and to personalise your experience (improving your experience/relationship with Key Performance Training, providing

Key Performance Training GDPR & Privacy Policy



more relevant products, services, communications and experiences and developing our business are the legitimate interests relevant here). We only send you direct marketing communications where we have your consent.

We use information about who you are and your health to support the management of public health situations

We may collect and use information about your health in order to support public health situations and protect the health and wellbeing of our customers and our employees. We'll only collect and use the minimum amount and type of information necessary and will make sure such information is kept secure and only kept by us for the minimum period needed before being securely destroyed.

Using your information to make sure we support vulnerable customers and those with accessibility needs

We're committed to understanding the needs and preferences of customers in vulnerable circumstances and those with accessibility requirements. We aim to respond to these needs by removing the barriers these customers may face, or by not creating the barriers in the first place. To do this, we collect and use information to help us identify and appropriately support vulnerable customers and those with accessibility needs. We'll only collect and use this information where we have your consent, or where we have a legal or regulatory obligation to do so.

Using and sharing your information to recover unpaid debts on your account

We may share your information with debt collection agencies where there's an outstanding debt owed on the account. We do this so that they can use the information, alongside other information that they hold, to attempt to contact you on our behalf so that we can recover the debt. In some cases, where we have been unable to recover the amount owed, we may sell the debt to a third-party debt management company. You'll be informed when this takes place. Following the sale of the debt, any questions you have about communications you receive should be directed to the company in question.

How we collect your information

We collect your information in different ways.

Directly from you

Most of the information we use is provided to us by you. You give us information when:

- you're finding out about our products and services and thinking about becoming a Key Performance Training customer
- you're ordering products and services or entering into contracts with us
- setting up and managing your account
- raising issues and concerns with us as a customer. When you call in to customer services or communicate with us online - via our website, for example -, we monitor, record, store and use those communications to improve the quality of our customer service and/or for training, operational and compliance purposes
- you're visiting our websites or online portals

Key Performance Training GDPR & Privacy Policy

- participate in competitions and other promotional activities we may run from time to time You provide this information to us via our websites, cookies, via social media, when calling us or communicating with us in any other way.

Indirectly from others

We collect information about you from other people or organisations. Where we obtain your personal information from a third-party or external source, we carry out appropriate checks and take suitable steps to make sure we're receiving your information in accordance with our data protection obligations. We obtain information from the following sources or companies:

- an existing Key Performance Training customer who wishes to refer you
- other companies we use to market and sell our products and services on our behalf
- other people you've authorised to have access to your account
- other companies who we obtain your contact details from and who have obtained your prior consent to your information being shared with us so that we can contact you about our products and services
- Debt collection agencies
- Fraud and anti-piracy prevention agencies
- Market research companies
- Publicly available sources (for example the electoral roll)
- Data brokers and other companies that supply information to help us develop profiles of our prospective, actual and former customers
- Address verification services
- Third-party accounts e.g., lettings and estate agents collect prospect data that's passed on to Key Performance Training

From your use of our products and services

You generate information when you use our products and services. You generate information in the following circumstances:

- When you visit our websites, we'll use cookies and similar technologies to collect information about your visit. Some cookies are essential for our websites to work and others remember things about you to give you a better, more enjoyable online experience. They also help us to create content, advertise our products and services and personalise our offers to you. Further details about how we use cookies and similar technologies, and what choices and rights, you have can be found at <https://keyperformancetraining.co.uk/privacy-policy/>
- When you use Key Performance Training products and services we collect contact data, location data and behavioural data from your use of those services, including information relating to:
 - your device(s) connected to our network. Devices and applications have their own privacy settings and notices under which they collect your information, so please check and manage your device and app settings
 - CCTV recordings when you visit any of our offices, sites or facilities.

Key Performance Training GDPR & Privacy Policy



Who we share your information with and why

Sometimes we'll need to share the information we hold about you with others. We only share your information with other companies and organisations where we have a legal obligation to do so or otherwise where we're satisfied that there's a legitimate need to share the information, and that appropriate checks and suitable measures are in place to make sure the data is shared and protected in accordance with our data protection obligations.

Third party sharing

We communicate personal data to the following types of companies and organisations:

- Other training providers
- Government bodies (such as Education & Skills Funding Agency (ESFA), an executive agency for the DfE to create a Unique Learner Number (ULN) and to create your Personal Learner Record are part of the functions of the DFE)
- Local authorities
- Accreditation bodies (such as Ofsted, RTITB, FAA)
- Customer service providers
- Equipment hire providers
- Printing and printer service providers
- Engineer services firms
- Couriers and delivery companies
- Payment service providers
- IT services companies
- Business consultancy services companies
- Debt collection agencies
- Data brokers
- Marketing companies that deliver our communications
- Direct Debit scheme

Other data sharing

We also share your information with organisations that are not suppliers where we have a legitimate reason to do so. Other organisations with whom we share your information are:

- Fraud and anti-piracy prevention agencies
- Organisations in a corporate restructure, merger or acquisition
- Courts, enforcement authorities and industry organisations
- Non-Key Performance Training apps that provide services as part of your agreement with Key Performance Training. We may share customer contact details with such third parties, for example

Key Performance Training GDPR & Privacy Policy

RTITB, to verify your services, such as online training courses, facilitate the activation of the third-party service, send activation reminders and other service information.

- Companies you ask us to share your data with
- Our advertising partners, including social media advertising partners. We do share your personal data with some organisations based outside the United Kingdom. We grant these organisations access to personal data only where necessary and only where appropriate security measures and controls are in place to protect your personal data in accordance with applicable data protection laws, regulations and regulatory guidance: a. If there is a decision under the UK data protection law that the country to which your personal data is transferred provides an adequate level of data protection (adequacy decision), we rely on this. For example, the European Economic Area (EEA), which consists of countries in the European Union, Switzerland, Iceland, Liechtenstein and Norway, has received such an adequacy decision. b. If there is not such an adequacy decision, we implement appropriate safeguards or other available legal mechanisms for transferring personal data to third countries. For example, we enter into appropriate contracts, known as standard contractual clauses, with our business partners and suppliers in those third countries to ensure the protection of your personal data.

How long we keep your information for

We collect and store your information safely and only for as long as we need it for the purposes we've explained in this GDPR and Privacy Policy. Afterwards it'll either be securely destroyed or anonymised. When determining the relevant time periods we store information, we take into account the following factors:

- Whether the purposes(s) for which we collected the information are still valid.
- Any legal obligation(s) requiring information to be kept for certain periods of time.
- Unless you ask us not to, we store your generic details (i.e. name, surname, contact details) for up to two years after you stop being our customer, to contact you just in case you change your mind.
- Potential or active disputes or regulatory proceedings.
- Guidelines issued by the Information Commissioner's Office.

Your rights in relation to your information and how to exercise them

You have various rights in relation to your information.

Manage your marketing preferences

We like to contact you to make sure you don't miss out on our latest upgrades and offers and get the best products and services from Key Performance Training. We only send relevant communications, and we won't bombard you.

You can update your marketing preferences by contacting us here to opt out of receiving marketing communications from us. You also have the right to object to your information being used for any direct

Key Performance Training GDPR & Privacy Policy



marketing purposes, not just receiving marketing communications. If you wish to object, please see the “How to contact us” section at the bottom of this GDPR and Privacy Policy.

Manage your consent

Where we use your information for purposes other than marketing on the basis of consent, you have the right to withdraw your consent at any time by contacting us. Please see the “How to contact us” section at the bottom of this GDPR and Privacy Policy. Our use of your information prior to the withdrawal of consent remains valid.

The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we’re providing you with the information in this GDPR and Privacy Policy. If you have any questions about our GDPR and Privacy Policy, please see the “How to contact us” section at the bottom of this GDPR and Privacy Policy.

The right of access

You have the right to obtain access to your information (if we’re processing it), and certain other information about how we use your information (similar to that provided in this GDPR and Privacy Policy). This is so you’re aware and can check we’re using your information in accordance with data protection law. In most cases, we won’t charge for this and we’ll do our best to get details back within 30 days. If you want to access your information, please do so here. To help you understand your request and our obligations we have answered some frequently asked questions (FAQs) here.

The right to rectification

You’re entitled to have your information corrected if it’s inaccurate or incomplete. Please see the “How to contact us” section at the bottom of this GDPR and Privacy Policy.

The right to erasure

This is also known as ‘the right to be forgotten’ and, in simple terms, in certain circumstances enables you to request the deletion or removal of your information where there’s no compelling reason for us to keep using it. If you want to exercise the right to erasure, please email office@keyperformancetraining.co.uk

The right to restrict processing

In some circumstances, you have rights to ‘block’ or restrict further use by us of your information. When processing is restricted, we can still store your information but may not use it further. Where applicable, we keep lists of people who’ve asked for further use of their information to be ‘blocked’ to make sure the restriction is respected in future. If you want to exercise the right to restriction, please email office@keyperformancetraining.co.uk

The right to data portability

You have rights to obtain and reuse your personal data for your own purposes across different services. e.g. if you decide to switch to a new provider, this enables you to move, copy or transfer your relevant information easily between our IT systems and theirs safely and securely, without affecting its usability, such as your name and address.

If you want to exercise the right to portability, please email office@keyperformancetraining.co.uk

Key Performance Training GDPR & Privacy Policy



Rights in relation to automated decision making and profiling

We sometimes make automated decisions based on personal information you've supplied, or we've collected from others about you. This helps us to make sure the decisions we make are quick, fair and correct based on what we know about you.

These automated decisions can affect the products and services we may offer you. We'll make sure human intervention is possible where there are any concerns about the decision. We want to make sure decisions about automated decisions are fair and transparent.

We use technology to make decisions automatically or to build profiles about you. This technology uses logic that analyses your preferences and how you use our products and services, which helps us to improve your customer experience, making it more relevant for you and allowing you to get the most out of our products and services. This means you'll regularly receive from us personalised content (offers, promotions, etc.).

You have the right to object to our use of automated decision making in some circumstances. Please remember that if you object to certain types of automated decision making, it may affect our ability to provide you with the optimum level of customer service and our ability to provide you with certain products, financing and services. To find out more about your rights to object to certain kinds of processing, please visit the 'Right to Object' section below for more information.

The right to object

You have the right to object to your information being used by us in certain circumstances, including processing for direct marketing and automated decision making. If you want to exercise the right to object, please see the "How to contact us" section at the bottom of this GDPR and Privacy Policy.

How to contact us

Complaints

If you'd like to make a complaint about how we use your information, please see the "How to contact us" section at the bottom of this GDPR and Privacy Policy and we'll do our best to help. If you aren't satisfied with our response to your question or concern, or believe our processing of your information doesn't comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) at <https://ico.org.uk/global/contact-us/>.

Contacting us

For queries about Key Performance Training's services, please call our team 01793 975353. If you have any queries or comments about this GDPR and Privacy Policy, please write to Data Protection Officer, Unit 9 Rockhaven Park, Kembrey Street, Swindon, SN2 8BB or contact our Data Protection Officer by emailing office@keyperformancetraining.co.uk.

Review

This GDPR and Privacy Policy will be reviewed annually.

Date of last review: Oct 2025

Next review due: Oct 2026