

## Privacy Notice – Adult

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### 1. Introduction

This notice applies to people receiving services from Novus Cambria.

There is a summary version of this policy available on request from Novus Cambria staff, or at: [www.novuscambria.ac.uk/data-protection](http://www.novuscambria.ac.uk/data-protection)

We regularly review and, where necessary, update our privacy information.

This notice is available in Welsh and English.

### 2. What is the purpose of this document?

Novus Cambria is part of LTE Group. We are committed to protecting the privacy and security of personal information. This notice describes how we collect and use personal information in accordance with data protection laws.

If you have any questions regarding this document or your personal data, you or your representative can contact our Data Protection Officer, or you can ask any Novus Cambria staff to do this on your behalf:

- LTE Group, Whitworth House, Ashton Old Road, Manchester M11 2WH
- Your representative can also contact us via: [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

### 3. Data protection principles

UK data protection law says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected and used for valid purposes that we have clearly explained to you only
3. Relevant to the purposes we have told you about and limited to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary
6. Held securely

### 4. The kind of information we hold about you

Personal data, or personal information, means any information which identifies an individual. It does not include data where the identity has been removed (anonymous data). There are also **special categories** of more sensitive personal data which require a higher level of protection

### The categories of personal information that we may collect include:

- Name, age, gender
- Prison management information and prison number
- Employment/education information/history, Unique Learner Number (where relevant)
- Photography and video of you/your work
- Photograph to be used for exams, e.g., CSCS card (where relevant)
- Contact details (where relevant)

We may also collect, store and use the following "**special categories**" of more sensitive personal information:

- Health, including any medical conditions, injuries or learning difficulty and disability status
- Ethnicity/nationality

### 5. How is your personal information collected?

We typically collect personal information through the information you provide to us during the induction process. We may collect additional information during your time with Novus Cambria.

### 6. How we use information about you

#### We may use your personal information to:

- let you access Novus Cambria services
- comply with health and safety rules
- monitor equal opportunities
- undertake audits
- process any complaints you may make
- protect you in an emergency
- research and plan within Novus Cambria and LTE Group

#### Our lawful bases for processing your data are:

- Performing a task (education) in the *public interest*
- *We have a contractual or legal obligation*
- *We have a legitimate interest*
- *We have your consent*

### 7. If information is not provided

If you do not provide personal information, we may not be able to provide you with access to our services, or we may be prevented from complying with our *legal or contractual obligations*.

## 8. 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.

## 9. Data Sharing

We may share your personal information with third parties, such as the custodial operator, awarding organisations, employers, and other learning/education providers. A full register of who we share your personal data with and why is available on request from the DPO. We may also have to disclose your personal information by law, or to comply with the law, if an Authority asks us.

All third parties are required to take appropriate security measures to protect your personal information. We only allow them to process your personal information for specific purposes. They must do this in accordance with our instructions.

## 10. Photography and Videography

Photographs and videos are sometimes taken at Novus Cambria programmes or events. We do this to help showcase the work we do as an education provider and to support our learning programmes. We will always obtain your *consent* before taking and using such images.

## 11. Data Security

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

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

## 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. This is available on request by contacting our DPO, using the details in [Section 2](#).

### 13. Your individual rights in connection with personal information

Under certain circumstances, by law, you have the right to request:

**Access to your personal information**

**Correction of the personal information**  
we hold about you if it is incorrect.

**Erasure of your personal information.**  
We can only do this in certain circumstances.

**Restriction of processing of your personal information**

**Transfer of your personal information to another party.**

And you can also:

**Object to processing of your personal information**

**Suspend processing of your personal information**

Please be aware that these rights are subject to certain conditions, as set out in UK data protection law.

If you wish to make any requests regarding your personal data, please speak with any member of Novus Cambria staff, or contact the DPO, using the details in [s.2](#). If you make a request, we may need specific information from you, or your representative, to confirm your identity.

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

If you are unhappy with how we have handled your data, you have the right to make a formal complaint with the following department. You may do this yourself, or your representative may do this on your behalf.

**The Company Secretary & General Counsel**

LTE Group  
Executive Suite  
Ashton Old Road  
Manchester  
M11 2WH

Your representative can also contact us via: [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

If you do not wish to discuss this with us, or you are unhappy with our response, you also have the right to make a complaint with the supervisory authority, the Information Commissioner:

**Information Commissioner's Office**

2<sup>nd</sup> Floor, Churchill House  
Churchill Way  
Cardiff  
CF10 2HH  
0330 414 6421

Your representative can also contact the ICO via:

[wales@ico.org.uk](mailto:wales@ico.org.uk)

More information on the ICO's complaint procedure can be accessed at: <https://ico.org.uk/make-a-complaint/>