LIMM SKILLS ACADEMY LTD
Innovation | Creativity | Empowerment

Who We Are and How to Contact Us

Who we are. Limm Skills Academy ltd (for the purposes of the GDPR) of your Personal Data (referred to as either "Limms ", "we", "us" or "our" in this Privacy Policy).
Our address is **Suit 21 Church lane, Church lane Chambers, Leytonstone London E11 1HG**.
.
How to contact us. If you have any questions about our practices or this Privacy Policy, please contact us at contact@limmskills-academy.com.

Your Rights Relating To Your Personal Data

You have the right under this Privacy Policy, and by law if you are within the EU, to:

- **Request access to your Personal Data.** If you are within the EU, this enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right if you are within the EU to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
- **Object to processing of your Personal Data.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing of your Personal Data on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your Personal Data.** we will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data ("Consent Withdrawal"). If you withdraw your consent, we may not be able to provide you with access to the certain specifics. We will advise you if this is the case at the time you withdraw your consent.

How to exercise your rights. If you want to exercise any of the rights described above, please contact us using the contact details in Who We Are and How to Contact Us.

Typically, you will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, except in relation to Consent Withdrawal, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

If you would like to submit a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact us at: **contact@limmskills-academy.com**.

We will reply to your complaint as soon as we can.

If you feel that your complaint has not been adequately resolved, please note that if you are in the UK the GDPR gives you the right to contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.

Marketing Communications Preferences

You can ask us to stop sending you marketing messages or modify your email preferences at any time through any of the following methods:

- by following the opt-out links on any marketing message sent to you; or
- through your account settings those who are using the e-systems i.e. E-portfolios.
- by contacting us at any time using the contact details in Who We Are and How to Contact Us.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of emails relating to existing or pending hires, purchases or investments using the Services or consent to direct marketing communications.

What Personal Data we collect

Limm Skills Academy (limms) uses Personal Data we collect to provide the Services, personalize content, remember information to help you efficiently access your account, analyze how the Services are used, diagnose service or technical problems, maintain security, monitor aggregate metrics such as total number of clients enrolled on a particular course, destination and progression, information, advice and guidance, ethnicity, gender, and demographic patterns.

Information You Directly Provide to Us. There are many occasions when you provide information that may enable us to identify you personally ("Personal Data") while using the Services. The Personal Data we may collect from you is outlined in the below.

Category of Personal Data collected	What this means
Identity Data	First name, surname, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, picture, social security number and/or tax identification number, password, copies of ID cards or other forms of identification.
Contact Data	Your home address, work address, billing address, email address and telephone numbers.
Professional Background Data	Educational and professional history, interests and accomplishments, job and salary preferences, third party recommendations, projects completed, professional resumes and CVs, information about Next of Kin. Copy of DBS those in the health and social Care, and childcare sectors.

Online Presence Data	Links to your public account pages at social media websites, links to personal websites, and other online materials related to you.
Financial Data	Contracted hours of work and ensuring the payment is equal or more than Minimum wage to meet funding guidelines.
Transaction Data	Any details about payments to and from you and other details of subscriptions and services you have purchased from us. Data in respect of your transactions
Content Data	Any content you post to the Services not already included in another category, including without limitation, your profiles, questions, preference settings, answers, messages, comments, and other contributions on the Services.
Marketing and Communications Data	Your preferences in receiving marketing from us and our third parties and your communication preferences. If you correspond with us by email or messaging through the Services, we may retain the content of such messages and our responses.

Personal Data from Third Party Sources. In addition to the Personal Data that we collect directly from you (as described in the section immediately above this one), we may also collect certain of your Personal Data from third party sources, some of which may not be publicly available. Examples of these sources are information from your employers or professional bodies you subscribe to allow us assess your eligibility for public funding and also for RPL for your intended qualifications.

LIMM SKILLS ACADEMY LTD
Innovation | Creativity | Empowerment

How We Use Your Personal Data and Why

We generally use Personal Data for the following:

- to deliver and improve our Services;
- To secure government funding.
- To register you with appropriate external agencies to obtain your qualifications.
- to manage your account and provide you with customer support;
- to perform research and analysis about your use of the Services;
- to develop, display, and track Content and advertising tailored to your interests on the Services.
- to diagnose or fix technology problems; to automatically update the Services on your device;
- to verify your identify and prevent fraud or other unauthorized or illegal activity; to enforce or exercise any rights in our terms of service-(Service level agreement)

In respect of each of the purposes for which we use your Personal Data, the GDPR requires us to ensure that we have a legal basis for that use if you are within the UK. The legal bases depend on the Services you use and how you use them. This means we collect and use your Personal Data only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests; or
- We need to process your data to comply with a legal or regulatory obligation.

We may also rely on your consent as a legal basis for using your Personal Data where we have expressly sought it for a specific purpose. If we do rely on your consent to a use of your Personal Data, you have the right to change your mind at any time (but this will not affect any processing that has already taken place). We have set out below, in a table format, more detailed examples of relevant purposes for which we may use your Personal Data.

Purpose	Why do we do this
Providing, updating, and maintaining our Services, e-learning systems and general businesses we offer.	To deliver the Services you have requested, including, for example, registering you with a funder in order to secure public funding for your chosen

	course, managing your account and profile, and authenticating you when you log in for those using e-learning systems. For our Job securing-related Services, this also includes, for example, surfacing relevant jobs, including you in candidate search results, and effectively matching your skillset and interests with available jobs on the Site.
Research and development	To enable us to improve the Services and better understand our users and the progression they wish to make. For example, we may conduct or facilitate research and use learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns, areas for additional features and improvement of the Services.
Communicating with users about the Services	To send communications via email and within the Services, including, for example, responding to your comments, questions and requests, providing customer support, and sending you technical notices, product updates, security alerts, and administrative, billing and account management related messages. We may also provide tailored communications based on your activity and interactions with us. For example, we may provide you with updates

	regarding new courses being introduced, government changes that affect your sector, notify you of other training opportunities, and providing information regarding your progress or that of your staff. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.
Providing customer support	To resolve technical issues you encounter, to respond to your requests for assistance, comments and questions, to analyze crash information, to repair and improve the Services and provide other customer support.
Enhancing security	To keep our, e-systems, website, e-portfolios, partners portals ,our Services and associated systems operational and secure, including, for example, verifying accounts and activity, monitoring and investigating suspicious or fraudulent activity and to identify violations of our terms and policies.
Marketing, promoting and driving engagement with the Services and third-party products and services	To send promotional communications that may be of specific interest to you, including, for example, by email and by displaying products and services offerings, job listing, candidates, events, promotions and other information on our Site or other companies' websites and materials. These communications may be aimed at driving engagement

	and maximizing what you get out of the Services or promoting third-party products and services. You generally can control whether you receive these communications as described in this policy under Marketing Communications Preferences.
To comply with applicable law, legal process and regulations and protect legitimate business interests	As we believe is reasonably necessary to comply with a law, regulation, order, subpoena, rule of a self-regulatory organization or audit or to protect the safety of any person, to address fraud, security or technical issues, or to protect our legal rights, interests and the interests of others, such as, for example, in connection with Prime contract holders (e.g. due diligence requirements).

What happens when you do not provide necessary Personal Data?

Where we need to process your Personal Data either to comply with law, or to perform the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the functionalities of the Services). In this case, we may have to stop you using our Services.

Who We Share Your Personal Data With

We may share your Personal with third parties in the ways that are described in the table below. We consider this information to be a vital part of our relationship with you.

Recipients	Why we share it
Our Affiliates and Partners	Our affiliates and Partners may access your Personal Data to help us develop, maintain and provide our Services and help manage our customer relationships (including providing customer support, customer liaison, funding advisory services, etc). For example Prime funders and Contract holders.
Service Providers	Our service providers provide us support for our Services, including, for example, website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis, identity verification, background and compliance reviews, E- learning providers for administration, Awarding bodies, Accountants and Legal service providers and other services for us, which may require them to access or use Personal Data about you.
Professional Advisers	Our lawyers, accountants, bankers, auditors and insurers, Brokers and Recruitment consultants may need to review your personal data to provide consultancy, compliance, legal, insurance, recruitment, accounting and similar services.
Legal and Taxing Authorities, Regulators and Participants in Judicial Proceedings	Limms may disclose your Personal Data if we believe it is reasonably necessary to comply with a law, regulation, order, subpoena, rule of a self-regulatory organization or audit or to protect the safety of any person, to address fraud, security or technical issues, or to protect our legal rights, interests and the interests of others, such as, for example, in connection with government changes and education funding and strategy for business (e.g. due diligence).

Advertisers	For the purpose of Professional development, Certain users of the Services may have access to your Personal Data for the purpose of enabling them to interact with you and more effectively offer opportunities through the Limms that are targeted towards your background and preferences. We may also allow third-parties, including ad servers or ad networks, to serve advertisements on our literature or website, and such third parties may be provided with access to your Personal Data to provide advertising tailored to your interests.
Researchers	To enhance the public understanding of patterns and trends in the markets served by or Services, e.g. Trailblazers, we may provide Personal Data to third parties under confidentiality obligations such as, for example, academics or contractors for research purposes.

How long we store your Personal Data

We will retain your information for as long as your account is active or it is reasonably needed for the purposes set out in How We Use Your Personal Data and Why unless you request that we remove your Personal Data as described in Your Rights Relating to Your Personal Data. We will only retain your Personal Data for so long as we reasonably need to use it for these purposes unless a longer retention period is required by law (for example for regulatory purposes). This may include keeping your Personal Data after you have deactivated your account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

Where We Store Your Personal Data

The Services are maintained in the United Kingdom at our head office in Leytonstone address as described above on the organisations main servicer. Personal Data that you provide us may be stored, processed and accessed by us, our staff, sub-contractors and third parties with whom we share Personal Data in the UK or elsewhere inside or outside of the EU for the purposes described in this policy. We may also store Personal Data in locations outside the direct control

of Limms (for instance, on servers or databases co-located with hosting providers). Although we welcome users from all over the world, by accessing the Services and providing us with your Personal Data, you consent to and authorize the export of Personal Data to the our hosting organisations and its storage and use as specified in this Privacy Policy.

Because the Services are maintained in the United Kingdom, we do not transfer your Personal Data from the EU to any parties located outside the EU other than Personal Data relating to webhosting in or out of the United Kingdom. When information is transferred to us from the EU by our affiliate, we use specific contracts approved by the European Commission, which give Personal Data the same protection it has in the EU. For further details, see European Commission: Model contracts for the transfer of Personal Data to third countries.

How We Protect Your Personal Data

Limm Skills uses industry-standard physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. We limit access to your Personal Data to those employees and other staff who have a business need to have such access. All such people are subject to a contractual duty of confidentiality we carry out DBS checks in line with the Data Protection Act 2018 and the Safeguarding Policy and procedure. We cannot, however, ensure or warrant the security of any information you transmit to Limms or guarantee that your information on the Services may not be accessed, disclosed, altered, or destroyed by a breach of any of our physical, managerial, or technical safeguards.

We have put in place procedures to deal with any actual or suspected Personal Data breach. In the event that personal information is compromised as a result of such a breach of security, Limm Skills will promptly notify those persons whose personal information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

Limms cannot ensure that your Personally Data will be protected, controlled or otherwise managed pursuant to this Privacy Policy if you share your login and password information with any third party, including any third party operating a website or providing other services.