

# Privacy Policy

The Bathroom Academy is entirely web-based training using the eLearning modules

This privacy policy sets out how the Bathroom Academy (BA) collects and uses information about individuals.

Please read this privacy policy carefully to understand how the BA will use your information. If you have any questions or queries in relation to this privacy policy, you can contact us at:

[info@bathroom-academy.co.uk](mailto:info@bathroom-academy.co.uk)

Bathroom Academy c/o The Bathroom Manufacturers Association, Innovation Centre 5, Innovation Way, Keele University Science & Innovation Park, Keele, Newcastle, Staffs. ST5 5NT

Tel: 01782 631619

## Information we may collect about you

We may collect the following information about you:

### Information you give to us.

You may give us information about you if you register on the [www.bathroom-academy.co.uk](http://www.bathroom-academy.co.uk) site, filling in a form, contacting us by phone, post or e-mail, in person or giving us a business card, we may also collect data being shared by your colleagues and/or superiors.

The information you give us depends on the reason for you contacting us, but can include your name, job title, address, date of birth, e-mail address, mobile number, telephone number, password and financial information. We will not collect information beyond what is necessary, but we are legally required to hold some types of information to fulfil our business obligations.

When using the BMA's website we may collect, store and use the following kinds of information:

- (a) Information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page view, website navigation);
- (b) Information that you provide to us for the purpose of registering with us;
- (c) Any other information that you choose to send to us; and
- (d) Other information

## Cookies

A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both "session" cookies and "persistent" cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. We will use the persistent cookies to: enable our website to recognise you when you visit.

Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just thirdparty cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites, including this one.

## Information we receive from other sources.

We work closely with other organisations, such as business partners, sub-contractors, analytics providers, search information providers, and we may receive information about you from them. For example, we could gain access to your business contact details via recognised business data providers who collate information from sources including publicly available information such as Companies House. We may also be given your contact details by your employer, if they think that you would benefit from getting involved with the BA or benefit from engaging in our activities or training modules

The categories of information we receive from these sources may include all or some of the following; your name, address, date of birth, e-mail address and phone number and data relating to access

We may also collect information about you from publicly available sources, such as media reports, in order to better understand the people who we interact with.

## Use of your information

We need to obtain, store and use information about you for legitimate business purposes - namely so that you can enjoy and benefit from our services. We may use information we hold about you in the following ways:

- Carry out our obligation based on the Bathroom Academy benefits, as well as to send you material and communications which you have requested.
- To update and correct registration records
- To confirm your identity
- To let you know about other relevant services, both ours and those of other parties whose products and services we have agreed should be made available to you
- To carry out statistical and market analyses, including benchmarking exercises, to enable us to understand you better and improve our services
- Send you information relevant to direct marketing, surveys, events and feedback
- To develop, test and improve our systems
- To notify you about changes to our services
- To ensure the content of our website is presented in the most effective manner for you and for your computer
- Provide you with access to relevant areas of the Academy website
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

We may combine information we receive from other sources with information you give to us for the purposes set out above (depending on the types of information we receive).

## Contacting you

An important part of our work is communicating with our registered students, telling them about our activities and how we are supporting their interests. To do so, we use personal information to keep in touch with individuals registered on the training programme, as well as partners and other individuals.

We will use the contact information you have given us to send you important information. This may be by post, email, text message or telephone.

We may also use the information we hold about you in order to provide you with information about other training modules and services we feel may interest you.

We do not generally seek your consent to send you marketing communications if you have registered onto the Bathroom Academy. We believe that such communications are both in our legitimate interests, to raise awareness of our work and promote our services, and in your interests. However, you do have the right to ask us to stop sending you marketing communications. If you would like to stop receiving these, please email: [info@bathroom-academy.co.uk](mailto:info@bathroom-academy.co.uk) to update your preferences.

Information submitted to us via our websites will be used for the purposes specified in this privacy policy or in relevant parts of the websites.

We may use your information to:

- A) Administer the website
- B) Improve your browsing experience by personalising the website to you;
- C) Enable your use of the services available on the website;
- D) Supply to you services purchased via the website;
- E) Send statements and invoices to you, and collect payments from you;
- F) Send you general (non-marketing information) commercial communications
- G) Send you email notifications which you have specifically requested;
- H) Send to you marketing communications relating to our organisation which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications)
- I) Deal with enquiries and complaints made by or about you relating to the website

## Sharing your information

We may share your information with selected third parties including:

- Online service providers such as marketing systems and survey tools

We may also share your information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or the safety of our customers or others.

We will not sell or distribute your information for profit to any 3<sup>rd</sup> party.

## Our legal basis for collecting, holding and using your information

Data protection law sets the lawful legal bases (or 'conditions') which allow us to collect, hold and use your information. For the Bathroom Academy, these are:

- For the purposes of our own legitimate interests. We believe that we have a legitimate interest in being able to provide our services to our students. As set out in this notice, this sometimes requires us to collect and use personal information about individuals. We only use this legal basis where these interests are not overridden by your interests and fundamental rights or and freedoms.
- Where we have entered into a contract with you. In these circumstances, we may need to process your personal information in order to fulfil the contract. Where we are under a legal obligation to process personal information. For instance, we are required to collect certain information in accordance with our obligations under equalities legislation.
- Sometimes, we will ask you for your agreement to process your information. This is particularly the case when we wish to collect or use any special categories of information

## Security and storage of your personal information

The Bathroom Academy will take all reasonable steps to ensure that your data is stored securely and in accordance with this privacy policy. We hold all information on a database on secure data modules and a secure server, housed in a data centre. A backup of this information will be held on secure data modules. Paper copies of data will be held at the BMA and secured in locked cabinets and alarmed rooms. If it is necessary to transport data it will be kept secure.

We will keep personal information about you no longer than is needed for us to carry out the functions described in this notice. For example:

- We will keep your information held as part of our student records for the duration of your course. Once all modules registered for have been completed, we will delete your course records after 3 years and only retain the minimum information necessary to deal with any future issues for up to a maximum of 6 years.
- Information held on students registered onto the Bathroom Academy, but who have not purchased course modules within 1 year of registration will have all data deleted on the anniversary of their registration or within 1 month of that anniversary.

## Your rights

You have the right to request from us access to your own information.

If you wish to know what data we hold for you please email the BMA at [info@bathroom-academy.co.uk](mailto:info@bathroom-academy.co.uk) and we will respond within 30 days of that request (depending on availability)

You also have the right to ask us not to process your data for direct marketing purposes.

You can exercise this right by contacting [info@bathroom-academy.co.uk](mailto:info@bathroom-academy.co.uk)

From 25 May 2018, you have additional rights to request from us:

- The right to be informed
- The right of access
- That any inaccurate information we hold about you is corrected and confirmed
- That your information is erased

- That we stop using your personal information for certain purposes
- That your information is provided to you in a portable format
- The right to object
- That decisions about you are not made by wholly automated means

Many of the rights listed above are limited to certain defined circumstances and we may not be able to comply with your request. We will tell you if this is the case.

If you choose to make a request to us, we will aim to respond to you within one month. We will not charge a fee for dealing with your request.

## Consent

By registering on the site at [www.bathroom-academy.co.uk](http://www.bathroom-academy.co.uk) and its associated Sites or providing us with your information, you are consenting to the collection, storage and processing of your information by us in the manner set out in this policy.

In general, we gather information about all of our users collectively, such as which area you visit most frequently and what services you access the most. To protect your privacy, we use this information anonymously and aggregated with other users' information. The information collected helps us determine what features and services are of most benefit to you in order to create the best possible service for you.

## Privacy Policy Changes

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page to ensure you are happy with any changes.

## Third Party Amend

The Website contains links to other websites. We are not responsible for the Privacy Policies or practices of third party websites.

## Updating Information

Please let us know if the information which we hold about you needs to be corrected or updated.