



ARLLS Privacy Notice

For Clients and Learners

Registered name: ARLLStar Ltd is registered in England and Wales No. 15409391.

ARLLS holds personal information about learners who are enrolled on courses by ARLLS clients. We only use personal information about learners to deliver programme information including course and workshop content, notices about programme deadlines, performance information including attendance records, and learner feedback to clients.

If at any point you have questions about our privacy notice, or how we are using learner data, please contact us (details below).

Contact details

Post: Sandells House, Cliftons Lane, Reigate, Surrey, RH2 9RA, GB

Email: info@arlls.com

1. About this Privacy Notice

The purpose of this privacy notice is to explain how ARLLStar Ltd ("ARLLS", "we", "our", "us") processes personal data of learners enrolled on its courses and workshops on behalf of client organisations and how it will be used, distributed, stored, and destroyed. ARLLS includes the central offices at Reigate, Surrey UK, and any ARLLS Staff located in countries in which we operate.

2. What information we collect, use, and why

(a) Learner data

All the personal data we process is provided by learners to an ARLLS client organisation who shares it with us. It may also be that learners share personal information with us directly. We use this information to enrol learners on the ARLLS programme and to monitor their performance. Learners may also provide feedback and commentary within courses or workshops which is then held in our systems. We collect or use the following information, all for learner education and welfare:

- Names and contact details for learners
- Date of birth
- Attendance data and reasons for absence
- Progress and performance reports
- Commentary in course forums and workshops
- Information or feedback relating to compliments and complaints



(b) Marketing data

We research and collect business-to-business marketing data from publicly available sources and third parties. This is contact information which enables us to appropriately target our ARLLS products and offers. We collect a variety of information. Examples include:

- Contact information such as name, address, phone number, or email address
- Purchase information such as items clients have purchased, payment method and payment information, billing address, and contact information
- Preference information such as contact and marketing preferences
- Profile and account information which may include name, organisation, job role, phone number, email address, and account password

We and third parties may collect information from the computer, tablet, phone or other device that clients or prospective clients use to access ARLLS material, or that clients or prospects use to open an email or click on a promotion or advertisement from us. This collection includes automatically collected information, and generally does not include personal information unless clients or prospects provide it through a mobile application or they choose to share it with us. Methods we use include:

- Cookies (which may be session-based or persistent, and are typically small data files that are stored on your hard drive or in connection with your internet browser)
- Web beacons or tags (small images embedded into websites or emails that send information about your computer, tablet, phone or other device when you visit our website, or open an email we send you)
- Website and mobile application log files (which we tend to create automatically in connection with access to and use of our website and any mobile application)
- Other technologies which may be similar to or different than the methods noted above

Clients or prospects can opt out of marketing or advertising emails by utilising the 'unsubscribe' link or mechanism noted in the footer of our marketing or advertising emails they receive from us. They may also request to opt out of marketing or advertising emails by contacting us through one of the methods specified our emails or website, and sharing the email address at which they are receiving marketing or advertising emails.

3. Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using personal information of learners. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's [website](#).

Which lawful basis we rely on may affect learner data protection rights which are in brief set out below. More about the data protection rights of learners and the exemptions which may apply can be found on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.



- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure** - You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
- **Your right to object to processing** - You have the right to object to the processing of your personal data.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month. Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact us using the contact details above. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office on the ICO website.

4. Our lawful bases for the collection and use of learner data

Our lawful bases for collecting or using personal information for learner education and welfare are:

- **Contract** - we have to collect or use the information so we can enter into or carry out our obligations with you or the client organisation with whom we have a contract of supply. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we're collecting or using your information because it benefits you, the client organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

We are a provider of a programme of online leadership courses and workshops. We use email addresses and other contact information about learners from client organisations in order to be able to enrol them, contact them to deliver the ARLLS programme and provide results and feedback on learner course and workshop performance. Any feedback data provided by learners and client organisations is used by us to improve our own products and services. We send client organisations emails and updates about programme updates and developments, and performance information about the learners they have enrolled on the programme.

5. Where we get personal information from

- Directly from learners.
- Client organisations who are acting on behalf of learners and in their interest.

6. How long we keep relevant information

Commercial contracts:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contracts with clients	5 years after last action	Internal Shared Cloud Drive	Supply contract and delivery of programme	Delete computer record
Purchase orders and invoices	7 years after last action	Internal Shared Cloud Drive	Client Documents to fulfil supply contracts	Delete computer record

Marketing records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Mailing list contact information	1 year after last action	Internal Shared Cloud Drive	For contact mailing where appropriate	Delete computer record
Preference information	1 year after last action	Internal Shared Cloud Drive	For contact mailing where appropriate	Delete computer record

Client records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contact information	3 years after last action	Internal Shared Cloud Drive/Moodle	For client contact where appropriate	Delete computer record
Profile and account information	3 years after last action	Internal Shared Cloud Drive	For contact where appropriate	Delete computer record



Operational records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Policies/Procedures	7 years	Internal Shared Cloud Drive	Legal requirement	Delete computer record
Complaints	5 years from end of fiscal year	Internal Shared Cloud Drive	Legal requirement	Delete computer record

Intellectual property records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Copyright material	50 years from expiry	Internal Shared Cloud Drive/Moodle	Re-use/ Protection of Copyright	Deletion

Email records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Email correspondence	Archive emails after 6 months	Staff email accounts	Relevant reference	Outlook – Archive deletion

Learner records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contact details	6 months after the end of a Client Contract	Moodle/ Course Information System	Learner contact and course use	Deletion
Course completion details	6 months after the end of a Client Contract	Moodle/ Course Information System	Course delivery and performance management	Deletion

7. Who we share information with

- Organisations we need to share information with for safeguarding reasons
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Contractual staff and service providers



8. Data security

ARLLS takes the security of learner data and any data provided by a client organisation very seriously and we have appropriate security measures in place to prevent personal data from being accidentally lost or misused. Access to learner personal data is limited to those employees, contractors and other third parties who have a need to know. They will only process learner personal data on our instructions and they are subject to a duty of confidentiality.

9. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last updated

November 2024