

Introduction

Welcome to the privacy policy of Cogent Skills Group (Cogent Skills) with our main office address at First floor, 720 Mandarin Court, Centre Park, Warrington, WA1 1GG.

Cogent Skills respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our websites (regardless of where you visit them from) and when you apply for and/or undertake our services, including our training courses, apprenticeships and industrial placements. It also tells you about your privacy rights and how the law protects you.

The websites operated by us include:

- www.cogentskills.com
- www.apprenticesandgraduates.co.uk
- www.cogentskills.solutions
- www.cogentlearn.com
- learn.cogentskills.com
- www.siasuk.com
- www.sciencecareerpathways.com
- notjustlabcoats.co.uk
- www.scienceindustrypartnership.com
- cogentskills.com/membership/sip
- www.nssguk.com
- nuclearskillsdeliverygroup.com
- vacancies.cogentskills.com

(hereinafter referred to as the “Websites”).

This privacy policy is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

- 1. IMPORTANT INFORMATION AND WHO WE ARE**
- 2. THE DATA WE COLLECT ABOUT YOU**
- 3. HOW IS YOUR PERSONAL DATA COLLECTED**
- 4. HOW WE USE YOUR PERSONAL DATA**
- 5. DISCLOSURES OF YOUR PERSONAL DATA**
- 6. INTERNATIONAL TRANSFERS**
- 7. DATA SECURITY**
- 8. DATA RETENTION**
- 9. YOUR LEGAL RIGHTS**
- 10. GLOSSARY**

1. Purpose of this privacy policy

This privacy policy aims to give you information on how Cogent Skills collects and processes your personal data through your use of the Websites, including any data you may provide through the Websites when you contact us via our contact form, complete and return a job application form, request marketing to be sent to you, apply for and/or undertake our services, including training courses, apprenticeships and industrial placements, sign up as a member to any of our group companies (including SIP membership) and/or services, set up a user account or give us some feedback or complete a survey.

The Websites are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

Cogent Skills is made up of the legal entities, Cogent Skills Limited (registered no. 09361100), Cogent SSC Limited (registered no. SC129351), Cogent Skills Services Limited (registered no. 07806185), Cogent Skills Training Limited (registered no. 06430341) and Science Industry Assessment Service Limited (registered no. 09396974) (collectively referred to as Cogent Skills, "we", "us" or "our" in this privacy policy). The entities are joint controllers and both responsible for your personal data. This is because the entities determine the means and use of your data; for example, we work together to ensure appropriate encryption is in place, it is securely stored, and onward transmission of data is limited. We have explained what steps have been taken in relation to the joint controller relationship, our arrangement, and what this means to you, below. We never just 'hand over' your data with appropriately jointly determined safeguards. By accepting our terms and privacy policy, you are giving consent to the sharing and management of data as set out in this policy.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below:

Contact details

Our full details are:

Full name of legal entity:	Cogent Skills
Name or title of DPO:	Andrew Horrocks
Email address:	dpo@cogentskills.com
Postal address:	First Floor, 720 Mandarin Court, Centre Park, Warrington, WA1 1GG
Telephone number:	01925 515200

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

This version was last updated in November 2024 and archived historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Websites, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Non-Special Category of Personal Data

- **Identity Data** includes first name, maiden name, last name, age, marital status, username or similar identifier, title, gender and date of birth.
- **Contact Data** includes home address, work address, billing address, email address and telephone number.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased or requested from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Websites.
- **Profile Data** includes your username and password, services requested by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Websites and services, including number of visits, interaction with the Websites pages (i.e. clicking page links).

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Special Categories of Personal Data

This category of data was previously referred to as ‘Sensitive Personal Data.

- **Diversity Data** - we may collect data about your race or ethnicity.

If you fail to provide personal data

Where we need to collect personal data by law, or under 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 goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- contact us via our ‘contact us’ page;
- complete a job application form and return it to us;
- complete an online job application form via our Sites;
- request marketing to be sent to you;
- apply for and/or undertake our services, including training courses, apprenticeships and industrial placements;
- sign up as a member to any of our group companies (including membership) and/or services;
- attending or registering for a webinar;
- attending or registering for an event, conference or similar;
- set up a user account; or
- give us some feedback or complete a survey.

Automated technologies or interactions. As you interact with the Websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see the information regarding cookies in this policy.

Third parties. We may receive personal data about you from various third parties as set out below:

- Identity and Contact Data from publicly available sources such as Companies House and Duedil, LinkedIn.
- Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as funders of projects and via EOP and WFD grants.
- Sub-contractors.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Where we use a 'Special Category' of data, we are required to confirm an additional lawful basis (to that set out above) for the processing of such data which will most commonly include the following circumstances:

- Express consent that is freely, affirmatively, and transparently, given with regards to the processing described.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To register you as a new customer including sending emails relating to your account set up, status and account credentials. External Third Parties will be used for the hosting of such data. Where you expressly authorise us, we may draw information into your account from authorised third parties.</p>	<p>(a) Identity (b) Contact</p>	<p>Performance of a contract with you (i.e. a user subscribing to our service via the Websites)</p>
<p>To deliver services to you, including our training courses, apprenticeships and industrial placements and for managing payments, fees and charges relating to the same. External Third Parties may be used for facilitation of payments and hosting.</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To obtain funding and fulfil funding requirements with external third parties which may allow us to give funding grants and pay for certain training. We are required to disclose certain learner personal information (including where the funding is to be</p>	<p>Identity Contact Diversity Financial</p>	<p>Where any data is to be disclosed to a third party it will be with your consent and voluntary completion of forms for delivery to such third party (who will be a data controller for the purpose of the data collected). The justification for will therefore (unless otherwise confirmed by the third party provider) be:</p>

benefited of by you)		(a) Consent to disclose to third parties and process as set out for the purpose.
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To internally review and evaluate the quality of our services, including our training courses, apprenticeships and industrial placements as required by the Education and Skills Funding Agency.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Diversity	Where the data is a non-special category of data (i.e. excluding Diversity) we may use it on the basis of: (a) Necessary for our legitimate interests (to improve, monitor and audit our services). In relation to the use of special data – Diversity - for our own internal use, you will be asked to consent for us to use your data in this way, and the provision of Diversity data is voluntary. As such our basis of use will be: (a) consent In relation to submitting this data to third parties, you will only voluntarily be asked if you wish submit the data for this purpose and will be required to consent to the same when submitting your data. AS such, the sharing with third parties will be on the basis of: (a) consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Contacting you by email or phone regarding your	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>account (welcoming you to our service), reminding you of appointments and dates, re-engaging with you, maintenance of your account and updating of details.</p> <p>We may use External Third Parties for the processing of data to assist in sending emails and other correspondence.</p>		
<p>To enable you complete a survey or provide feedback. We may use External Third Parties for the processing of data to assist in sending emails and other correspondence.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and the Websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p> <p>We may use External Third Parties for the hosting of data, applications, website and technical support of the same.</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p> <p>We may use External Third Parties for the processing of data to assist in sending emails and other correspondence.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve the Websites,</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of</p>

products/services, marketing, customer relationships and experiences and to ensure the Websites display and operate properly on your devices.		customers for our products and services, to keep the Websites updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
If you apply for a job either direct to Cogent Skills or, in some instances, where you apply via a third party. Where you apply via a third party we will obtain information from that third party.	(a) Identity (b) Contact	Necessary for our legitimate interests (to assess suitability of candidates)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or received goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Cogent Skills Group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of using our services, requesting our services or providing feedback or surveys.

Cookies

Cogent Skills uses a technology called ‘Cookies’ across the Websites in order to deliver the best possible user experience. Cookies are files that are stored on your device each time you visit the Websites and enables understanding of your preferences and habits.

Cookies do not contain person-identifiable information such as Identity, Contact Data or Financial Data.

The Websites are set to ‘allow cookies’ and if you browse the Websites you consent to this. If you would prefer to deactivate cookies, you can do so by updating your browser settings. Please note that disabling cookies will limit the service that Cogent Skills can provide. For more information on how to update your settings, visit <https://ico.org.uk/for-the-public/online/cookies>

Cogent Skills uses three types of cookie:

- **Session cookies:** These enable the tracking of your movement across the Websites and save information to make life easier. For instance, a session cookie might save an item to your shopping basket, without which you would be forced to order each item separately.
- **Persistent cookies:** These enable your preferences and settings to be saved each time you visit the Websites. This makes using the Websites faster and reduces the need to re-enter data.
- **Third party cookies:** These enable tracking of user activity outside the Websites and optimise campaigns and analytics better.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law. For example, we may be required to disclose your data in the interests of public health, national security, or serious threats to health and/or safety (including child abuse or neglect).

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change

happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Cogent Skills uses SSL encryption to transfer information between your device and our servers. All data is encrypted 'at rest'. This means the data stored on our systems has been encrypted. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data.

Where we have anonymised your personal data (with consent where appropriate) or collected aggregated data for research or statistical purposes, we may continue to use that data indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). 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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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 to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. 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 at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Further information on these rights can be found on the ICO website.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month due to staff absences, 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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Cogent Skills Group acting as joint controllers and who are based in England and Wales and provide services as specifically set out herein, including providing training courses, apprenticeships and industrial placements.

External Third Parties

- Service providers acting as processors who provide IT and system administration services.

- Marketing service providers (including email list providers) who act as processors for our engagement correspondence and marketing with users.
- Online survey providers who convey information supplied by customers to Cogent Skills.
- Payment providers, as processors of payment information, including PayPal.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Financial providers or associated audit services.