

Privacy Policy



Policy Statement

It is the policy of **Glosscalm Ltd** (“we”, “us”, “our”, or “the Company”) to protect the privacy and personal data of all individuals who access our online training eLearning platform, visit our website, or otherwise interact with our services. We are committed to processing personal data lawfully, fairly and in a transparent manner, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR).

Purpose

This Privacy Policy sets out how Glosscalm Ltd collects, uses, stores, shares and protects personal data obtained through our eLearning platform and associated services. It also explains the rights available to individuals in respect of their personal data and how those rights may be exercised.

Scope and Applicability

This policy applies to all individuals who register for, purchase, or access training courses and related services delivered through the Glosscalm Ltd eLearning platform, including learners, employers purchasing courses on behalf of learners, website visitors, and any third parties who provide personal data to us.

In this policy, **Personal Data** means any information relating to an identified or identifiable natural person, as defined under the UK GDPR. **Processing** means any operation performed on personal data, such as collection, recording, storage, use, disclosure or erasure.

Data Controller

Glosscalm Ltd is the Data Controller responsible for the personal data processed through the eLearning platform. Queries concerning the processing of personal data, including requests to exercise data subject rights, should be addressed to the Company’s Data Protection point of contact via the contact details provided on our website.

Personal Data We Collect

We collect and process the following categories of personal data in connection with the eLearning platform:

- **Identity and contact data** – including full name, date of birth (where required to verify eligibility for a course), email address, telephone number and postal address.
- **Account data** – username, password (stored in encrypted form) and account preferences.

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- **Employer and billing data** – company name, job role, purchase order references and invoicing contact details, where training is purchased by an employer.
- **Transaction data** – details of courses purchased, payment method (processed by our third-party payment provider; we do not store full card details), and transaction amounts.
- **Learning data** – course progress, assessment responses, scores, time spent on modules, certification achieved and qualification records.
- **Technical data** – IP address, browser type and version, device information, time zone setting, operating system and platform.
- **Usage data** – information about how you use our website and platform, including pages visited and features accessed.
- **Marketing and communications data** – your preferences in receiving marketing from us and your communication preferences.

How We Collect Personal Data

We collect personal data through the following means:

- Directly from you when you register for an account, purchase a course, complete a form, contact customer support, or provide feedback.
- Automatically through your use of our website and platform, via cookies and similar technologies (see our Cookie Policy / Terms of Use).
- From third parties, such as your employer where they have purchased training on your behalf, or from accredited awarding bodies in connection with certification.

Lawful Basis for Processing

We only process personal data where we have a valid lawful basis under Article 6 of the UK GDPR.

The lawful bases we rely upon are:

- **Performance of a contract** – to provide the eLearning services you (or your employer) have purchased, including account creation, course delivery, assessment and certification.
- **Legal obligation** – to comply with our legal and regulatory obligations, including tax and accounting requirements and, where applicable, record-keeping obligations relating to accredited training.
- **Legitimate interests** – for the efficient administration of our business, improving our platform, preventing fraud and ensuring platform security, provided our interests are not overridden by your rights and freedoms.

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- **Consent** – for specific purposes such as direct marketing communications. Consent may be withdrawn at any time without affecting the lawfulness of processing carried out prior to withdrawal.

How We Use Personal Data

Personal data is used for the following purposes:

- Creating and managing learner accounts on the eLearning platform.
- Processing purchases, payments, refunds and invoicing.
- Delivering training content, tracking progress and issuing certificates of completion.
- Communicating with you about your account, purchases and course progress.
- Providing customer support and responding to enquiries or complaints.
- Complying with health and safety, accreditation and legal or regulatory requirements.
- Preventing, detecting and investigating fraud, misuse or unauthorised access to the platform.
- Improving the quality, functionality and security of the platform, including through anonymised analytics.
- Sending service messages and, where you have consented, marketing communications about related courses or services.

Sharing Personal Data

Personal data may be shared with the following categories of recipients, where lawful and necessary:

- **Service providers and processors** – including platform hosting providers, payment processors, email service providers and IT support suppliers who act on our behalf under written contracts.
- **Employers and sponsoring organisations** – where they have purchased training on your behalf, we may share enrolment, progress and completion data with them.
- **Accrediting and awarding bodies** – where a course is accredited or leads to a recognised qualification, we share the necessary information to register your achievement.
- **Professional advisers** – including accountants, auditors, insurers and legal advisers.
- **Regulators and law enforcement** – where we are required to do so by law, regulation or court order.
- **Successors in business** – in the event of a sale, merger or reorganisation of the Company.

We do not sell personal data to any third party.

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International Transfers

Where personal data is transferred outside the United Kingdom, we ensure that appropriate safeguards are in place in accordance with the UK GDPR. These safeguards may include transfers to countries covered by UK adequacy regulations, the use of the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, or reliance on a specified derogation permitted by law.

Data Retention

Personal data is retained only for as long as is necessary to fulfil the purposes for which it was collected, including satisfying any legal, accounting, regulatory or reporting requirements. As a general rule:

- Learner account and course completion records are retained for a minimum of six (6) years to support re-issue of certificates and to meet accreditation and contractual requirements.
- Financial and transaction records are retained for six (6) years in line with HMRC requirements.
- Marketing data is retained until you withdraw your consent or object to processing.
- Technical and usage data captured for analytics purposes is retained for no longer than twenty-four (24) months in an identifiable form.

At the end of the applicable retention period, personal data is securely deleted or anonymised.

Data Security

We have implemented appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include encryption in transit (TLS), access controls, role-based permissions, secure authentication, regular backups, vulnerability monitoring, staff training and written agreements with all data processors.

In the event of a personal data breach likely to result in a risk to the rights and freedoms of individuals, we will notify the Information Commissioner's Office (ICO) without undue delay and, where feasible, within 72 hours of becoming aware of the breach, and will notify affected individuals where required by law.

Your Rights Under UK GDPR

Subject to the conditions set out in the UK GDPR, you have the following rights in respect of your personal data:

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- **Right of access** – to request a copy of the personal data we hold about you.
- **Right to rectification** – to request correction of inaccurate or incomplete data.
- **Right to erasure** – to request deletion of your data in certain circumstances.
- **Right to restriction** – to request that we restrict processing of your data in certain circumstances.
- **Right to data portability** – to receive your data in a structured, commonly used and machine-readable format.
- **Right to object** – to object to processing carried out on the basis of legitimate interests, including direct marketing.
- **Rights in relation to automated decision-making** – we do not carry out solely automated decision-making that produces legal or similarly significant effects.
- **Right to withdraw consent** – where processing is based on your consent.

Requests to exercise these rights should be made in writing to the Company using the contact details on our website. We will respond within one calendar month of receipt of a valid request.

Complaints

If you have a concern about how we handle your personal data, please contact us in the first instance. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters, at ico.org.uk or by telephone on 0303 123 1113.

Cookies

Our website and eLearning platform use cookies and similar technologies to ensure the correct functioning of the platform, to remember your preferences, to gather analytics and, with your consent, for marketing purposes. Further information is provided in our Cookie Policy and within the cookie consent banner presented on first visit.

Changes to This Policy

We review this Privacy Policy on an annual basis and may update it from time to time to reflect changes in law, regulation, industry practice or the services we provide. Material changes will be communicated through the eLearning platform or by email where appropriate.

Review

This policy will be reviewed on an annual basis.