

Privacy Notice

Purpose

The purpose of this privacy notice is to provide you with clear and understandable information about WDR's privacy practices regarding your personal identifiable information.

Our privacy promise



WDR is committed to respecting your privacy and protecting your personal information

- We will be transparent about the information we are collecting and what we will do with it.
- We will use the information you give us solely for the purposes described in our Privacy Notice, which includes providing you with learning and consultancy services that you, your employer, or, a WDR Client have requested and enhancing your experience with WDR.
- We will seek your consent to opt-in to receive marketing messages. If you change your mind at any time, tell us and we will stop sending them. We will, of course, continue to send important information relating to an active contracted service you still have, such as notification of changes to booked learning events or reminder of actions required for a learning activity
- We will put in place measures to protect your information and keep it secure.
- We will respect your data protection rights and aim to give you control over your own information.

WDR works on the underlying principle that your personal information is owned by you and you may grant us use of it for the lawful purposes outlined in this notice. Equally you may revoke that use.

WDR recommends that you take time to understand your data protection rights using information sources readily accessible from the internet. These rights can be summarised as:

- *Right to Access*
The right to request a copy of the personal data we hold about you.
- *Right to rectification*
The right to have inaccurate data corrected.
- *Right to erasure*
The right to request the erasure of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed.
- *Right to object*
In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes.
- *Right to restrict processing*
In certain circumstances, you have the right to request that the further processing of your personal data is restricted. This right arises where, for example, you have queried the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted.
- *Right to data portability*
In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another Data Controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means.

In Overview

WDR is a long established provider of Learning & Development services (including Apprenticeships, and Institute of Leadership & Management qualifications), and Learning Management System software typically to corporate companies.

Personal identifiable information, collected by WDR whilst providing those services, is primarily used to identify a person and to accurately maintain their record of learning activities.

WDR will use any required personal identifiable information solely for

- the service agreement purposes requested by you, your employer or your Training provider
- responding to any request you make to WDR, or WDR makes to you, for service proposals, service delivery or marketing action
- improvement of online services

That personal identifiable information will be

- retained by WDR until any lawful purpose has expired
- reduced to the minimum necessary for us to provide the requested services
- held within the UK within our own Data processing locations
- not shared with any other company except where required specifically to deliver the services requested by you:
 - For an Apprenticeship or Institute of Leadership & Management qualifications, we will ensure you are clearly advised of that exception and will obtain your specific opt-in for that to occur. Undertaking these learning activities requires the gathering of sensitive personal information from you in order to meet the obligations placed upon WDR by the appropriate agencies for the purpose of lawfully monitoring of Ethnicity & Diversity. WDR itself does not require that information for its processes.
 - Specialist Learning Providers & trainers to manage and deliver certain specialised learning activities; specialist eLearning delivery services when you are undertaken online eLearning courses

Your personal identifiable information

- will be collected directly from you, from your employer or a WDR Client
- will **not** be harvested from any 3rd party sources, such as Facebook, Twitter & LinkedIn, in order to augment your personal information.

WDR Marketing activities to you will be only on the basis of your specific opt-in to receive such communications and these will be stopped at your request. WDR has never and will not share your information for marketing purposes.

Consent

When you use any of the WDR.CO.UK websites, or communicate with WDR via email or any other communication means, you consent to the collection and use of your personal information for the purposes as described in this privacy notice.

Your continued use of any of the WDR.CO.UK websites, or further communication with WDR following posting of changes to these terms will mean you understand and accept those changes.

The full Privacy Notice

Use the following links to see the full details of Privacy Notice:

- [Identifying the Data Controller](#)

- [Our Policy towards Children](#)
- [Information we collect](#)
- [Information from Third Parties](#)
- [Information collected by Passive means](#)
- [Third Party Links](#)
- [How we use your information](#)
- [How we protect your information](#)
- [How we share your information](#)
- [Data Retention](#)
- [Managing your information](#)
- [Inquiries and Access Requests](#)
- [How to raise a concern or make a complaint](#)
- [Changes to this privacy notice](#)

Identifying the Data Controller

WDR acts, in Data Protection terms, as either a Data Controller or a Data Processor of your personal information depending upon your relationship with WDR.

The Data Controller in simple terms decides what personal information is collected, how it is processed, how it is shared, how it is managed and deals with data subject (“you”) requests. The Data Processor in simple terms delivers services under instructions provided by the Data Controller.

To determine who the Data Controller is, please select your relationship with WDR from the following:

- Your Employer has contracted with WDR to supply its employees with Leadership & Development services:
 - your personal information would have been supplied to WDR by your Employer.
 - In this situation the “Data Controller” is your Employer.
 - Your Employer will be defined as our “Client” and we will act in a Data Processor” role
- Your use of WDR services is offered to you by one of our Clients:
 - your personal information will be supplied either (i) by that Client using information that you provided to them, or, (ii) by you providing information via our websites.
 - In either situation the “Data Controller” is that Client and we will act in a Data Processor” role.
- Your role is as a Supplier of services to WDR, or you are a named party during a tendering, proposal or offer process:
 - your personal information would be obtained as a result of data provided in the communications between us and any agreements and proposals for which you were a named party
 - In this situation the “Data Controller” is WDR
- Your independent direct use of our WDR websites &/or services, or, as a job applicant or current or past employee:
 - your personal information will be supplied by you to WDR
 - In this situation the “Data Controller” is WDR

The WDR Data Controller contact details are:

Email: dataprotection@wdr.co.uk

Phone: +44 (0)1403 268251

Post: Data Protection
WDR Ltd
Park Lodge
60 London Road
Horsham
West Sussex

RH12 1AY

We are registered with the Information Commissioner's Office as a Data Controller under number Z9547555.

Our Policy towards Children

WDR's business is not focused on, nor do we knowingly collect information from, children under the age of 13. If a parent or guardian becomes aware that their child, who is under 13, has provided us with personally identifiable information without the guardian's consent, they should contact us at dataprotection@wdr.co.uk.

If WDR becomes aware that a child under 13 has provided us with personally identifiable information, we will immediately remove such information from our files.

Information we collect

WDR primarily gathers information about you in order to undertake our relationship with you from the source described in [Identifying the Data Controller](#). The information collected will be dependent upon the activity you are undertaking but may include:

- contact details such as your user name, email address, telephone number, your company's name, your job title and if applicable your postal address;
- your learning activities normally undertaken through our websites, including details of your learning history, qualifications, learning plans, learning progress, learning journal entries and learning evidence;
- Performance / 360 rating information / Capability Profiling where those services are undertaken;
- information you provide to us to receive technical assistance or during customer service interactions;
- If you are undertaking an Apprenticeship or Institute of Leadership & Management qualification through WDR, we may need to collect additional personal information, including sensitive personal information, to secure funding or to satisfy statutory legal or Government scheme requirements. If that is required, special handling of that information will be utilised to minimise security exposure and you will be provided with full details of its use to which you must sign your agreement;
- If you are our Client, you may provide information about other people to whom you wish the WDR services to be provided under the Clients service contract with WDR;

- if you are a supplier of service to WDR, or are our Client, details of any interactions between us;
- any information you provide whilst requesting information or services from WDR whilst using our www.wdr.co.uk website
- if you contact us by any communication means including whilst using our www.wdr.co.uk website, we may keep a record of your provided contact information and correspondence, including any information that you provide to us in your message;
- billing and payment information;
- your transaction history;
- aggregated data or other information that does not specifically identify you, such as actions taken on our websites;
- Passively gathered information (i.e. gathered without input from you)
 - information about your computer or device, including browser type and settings, IP address and traffic data relating to your Internet connection,
 - Temporary Session Cookies stored on your device in encrypted format whilst you are using our websites purely for processing state purposes
 - product performance data and information about how you use our products and services
- If you are a job applicant, your supplied contact information and career & education information (CV)
 - If you progress beyond an initial assessment of your suitability we will provide you with details regarding the personal information we will need and how it will be used and shared within WDR.

Information from Third Parties

WDR will only use information about you that we receive from Third Parties in the following specific circumstances:

- Evaluation & test results from your undertaking of a learning activity with one of our Specialist Training Suppliers / Trainers / Coaches
- Progress and funding information from the UK Government Education and Skills Funding Agency (ESFA) when you are undertaking an Apprenticeship
- Management information from The Institute of Leadership & Management when you are undertaking learning development to achieve any of their qualifications
- eLearning completion and success status information from SCORM.COM

Information collected by Passive means

Browser Information

Like the majority of companies with online systems, our servers automatically record log data that your browser sends whenever you interact with any of our websites. Log data may include information such as your IP address, browser type or the domain from which you are visiting, the web pages you visit and the search terms you use.

For most users accessing the Internet from an Internet service provider, the IP address will be different every time you log on. Unless described in this privacy notice, we do not use this information to identify you personally. We use it to monitor use of our websites and of our service, and for the technical administration of the websites.

Cookies

Like many websites, we also use “cookie” technology to collect additional website usage data and to improve our websites and service. A cookie is a small data file that we transfer to your computer’s hard disk.

We do not use cookies to collect personally identifiable information.

However, IP addresses are collected by the use of cookies. WDR may use both session cookies and persistent cookies to better understand how you interact with our websites and our service, to monitor aggregate usage by our users and web traffic routing on our websites, and to improve our websites and our services. A session cookie enables certain features of our websites and our service and is deleted from your computer when you disconnect from or leave our websites. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our websites. Persistent cookies can be removed by following your web browser help file directions. Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit.

Telephone calls

Data regarding telephone calls to & from you and the duration are recorded by our systems.

Call conversations are not recorded.

The data collected is purely used to monitor telephone call charges, telephone call queuing and to provide law enforcement agencies call information for abusive telephone calls.

Third Party Links

Our websites may contain links to third party websites such as Facebook, Twitter and LinkedIn. The fact that we link to a third party website is not an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. This privacy notice addresses the use and disclosure of information that we collect from you through our websites. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy notices of the third party websites you visit.

How we use your information

We may use your information to:

- communicate with you regarding the delivery of our service agreement obligations to you or your employee, requesting service or service information from you, or, responding to you if you contact us,
- verify your identity and entitlement to products and services,
- register and subsequently update your learning activity records to reflect the status (completion, pass/fail & scoring) of learning activities you have undertaken
- record and manage your learning activity evaluations and assessments in either a trainer/coach, service provider or learner roles

- manage your registered user account through which you can take advantage of the services made available by WDR, including access to the support or the download websites,
- allow you to view information on the websites,
- provide quotes, process orders and subscriptions, update order status, deliver products, and collect payment information and payment,
- collect feedback, conduct chat sessions and improve our chat sessions by reviewing them with our customer service representatives,
- secure our systems and applications,
- facilitate the provisioning of services,
- deliver newsletters, product updates or technical alerts related directly with your contracted services,
- provide you with a customized experience when you visit our websites,
- meet contractual obligations,
- enforce our legal rights or comply with legal requirements, and to detect & prevent crime
- evaluate, analyse and improve WDR's products and services through surveys, questionnaires, and other methods of gathering information,
- allow you to download our "white papers", participate in webinars or request a booking on one of our seminars,
- where you have provided an opt-in for such communications
 - deliver newsletters and product announcements,
 - communicate with you about and manage your participation in contests, offers or promotions,
 - market specific products and services

Specific information for those taking Apprenticeships through WDR

- If you are progressing your career with an Apprenticeship through WDR, we will need to collect additional personal information including sensitive information, in order to secure funding or satisfy statutory legal or Government scheme requirements.
- The information you supply to WDR will be used by the UK Government Education and Skills Funding Agency (ESFA) to fulfil its statutory functions, and by the UK Government Learning Record Service (LRS) to issue/verify your Unique Learner Number (ULN) and update/check your Personal Learning Record. The ESFA & LRS may share your ULN and Personal Learning Record with other education related organisations, such as Government Departments and public bodies responsible for funding your education.

Further details of how your information is processed and shared by the ESFA and LRS can be found at:

- <https://www.gov.uk/government/publications/esfa-privacy-notice>
- <https://www.gov.uk/government/publications/lrs-privacy-notice>

Specific information for those seeking an Institute Leadership & Management Qualification through WDR

- If you are progressing your career with an Institute Leadership & Management (i-l-m) Qualification Apprenticeship through WDR, we will need to collect additional

personal information including sensitive information, in order to satisfy statutory legal or Government scheme requirements.

Further details of how your information is processed and shared by the i-l-m can be found at:

- <https://www.i-l-m.com/privacy/learnerpersonaldata>

Specific information for job applicants, or, current & past employees

- If you are a job applicant, your supplied contact information and career & education information (CV).
 - If you progress beyond an initial assessment of your suitability we will provide you with details regarding the personal information we will need and how it will be used and shared.
 - If you do not progress to employment with WDR your information will be retained for the purposes of addressing any challenges to our selection for a period of 12 months after which time it will be erased. We may ask if you would like your details to be retained for a period of 12 months in order for fulfil any future internal job opportunity.
- If you are a current or past employee please refer to your employment contract and the Employee Handbook for detailed information of how your personal information is handled
- If you have any questions regarding how we handle your personal information then please contact hr@wdr.co.uk

How we protect your information

WDR takes safeguarding the confidentiality of your personally identifiable information seriously. We employ appropriate physical and computing security measures designed to protect your information from unauthorized access. Those measures include:

- controlled access to our facilities, locked doors and filing cabinets
- secure on-site destruction of media containing your information,
- the use of network protection, anti-virus and endpoint protection software, encryption, and monitoring of our systems and data processing locations to ensure that they comply with our security policies, and
- training and awareness programs on security and privacy, to make sure employees understand the importance and means by which they must protect your information.

We bind our employees contractually to observe your privacy and confidentiality rights.

How we share your information

General

Except as set out in this privacy notice, WDR will not share your personally identifiable information with third parties.

Sharing information with Third Parties

We may engage third parties, such as Specialised Training Suppliers, Trainers & Coaches, to provide your contracted services or to provide proposals for services requested by you.

When doing so WDR may share some of your personally identifiable information in the following specific circumstances:

- to manage a learning activity arranged on your behalf with one of our Specialist Training Suppliers / Trainers / Coaches
- to initiate and manage progress and funding for an Apprenticeship you are undertaking, WDR is required to share information with the UK Government Education and Skills Funding Agency (ESFA)
- to initiate and manage your learning activities when you are undertaking learning activities leading to a qualification from the Institute of Leadership & Management (i-l-m)
- to enable the delivery of eLearning courses to your device using SCORM.COM services

The personal information provided will be restricted to that absolutely necessary for the third party to deliver its contracted service.

In the cases of ESFA and i-l-m the personal information they require can be wide ranging and sensitive personal information is required. In these two cases WDR will ensure that you are (i) clearly advised of the required information and (ii) specifically when sensitive information is involved, the supplied information will only ever be sourced from you. WDR would advise you to review the Privacy Notices of those parties before entering into any learning activity involving those two parties.

Compliance with Laws and Law Enforcement

WDR cooperates with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including court orders); to protect the property and rights of WDR or our Service providers, the safety of the public or any person; to prevent or stop any illegal, unethical or legally actionable activity; or to comply with the law.

Business Transfers

WDR may decide to sell, merge or otherwise reorganize businesses. Such transactions may involve, in accordance with applicable law, the disclosure of personal information to prospective or actual purchasers. We make it a practice to seek appropriate protection for information in these situations.

Data Retention

Personal data will be maintained at the minimum levels needed to satisfy the reasons for which it was collected.

WDR will retain and use your information for the minimal period of time necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

For accounting reasons, WDR generally stores a minimal amount of your personal data necessary for accounting purposes for 7 years after the last processing operation.

We store other data as long as is necessary for the execution of the service agreement we have with you, your employer, or a WDR Client and to safeguard our rights. We reserve the right to apply longer statutory and operational storage requirements and reasons.

Where WDR services are provided to you under a service agreement with your Employer, or from one of our Clients, WDR will retain all your personal information until that service agreement is terminated. At that point WDR will:

- return your personal information to the designated Data Controller (our Client) as defined in that agreement,
- will erase the data from its systems, and
- access to your information will then be determined by that Data Controller.

Where you have a direct relationship with WDR, WDR will retain all your personal information until a period of 7 years has expired from the last learning activity you made with our systems. At that point WDR will communicate with you requesting your instructions regarding your personal information. If we are unable to contact using the last known contact information, we will erase the data.

Personal data collected for marketing activities is generally deleted as soon as the purpose of the activity has been met unless you opt-in to receive further marketing information when your details will be kept until you opt-out.

Personal information provided for job applications will be kept whilst your application is being processed and for a period of 12 months after the fulfilment of the vacancy for the purposes of any challenge to how the selection was made.

Managing your information

You are the owner of your personal information and WDR will observe all your rights over it.

In this section we provide details of:

- Marketing communications – how to opt-in & equally opt-out
- Updating your personal information
- Making Inquiries and Access Right Requests
- How to raise a concern or complaint

Choice/opt-out

We communicate with users who subscribe to our services on a regular basis via email, and we may also communicate by phone to resolve customer complaints or investigate suspicious transactions.

We may use your email address to confirm your opening of an account, to send you notice of payments, to send you notifications related to learning activities you are undertaking (such as event cancellations, changes, pre-work, assessments & evaluations), to send you information about changes to our products and services or to provide those products or services, and to send notices and other disclosures as required by law. Generally, users cannot opt out of these communications which are necessary to deliver our contracted obligations.

With regard to sending you marketing communications, WDR insists on a positive opt-in by you for such activities. You may revoke that opt-in at any time by contacting WDR either by email at info@wdr.co.uk or calling +44 (0)1403 268251.

Updating your personal information

Please help us keep the personal data you have shared accurate and up to date.

Please identify the appropriate Data Controller to contact (refer to [Identifying the Data Controller](#)) to arrange an update of your personal information.

If the Data Controller is WDR, and your update is regarding your

- **non-sensitive personal information:** please write (via postal or email) to us listing the changes required
- **sensitive personal information:** please write (via postal or email) to us indicating, in the first place, that you wish to (i) update sensitive personal information and (ii) the specialist programme you are undertaking through WDR that requires that type of information. Please **do not send** any sensitive information to the normal update request mailbox. WDR will arrange for the staff member dealing with that programme to contact you directly.

Inquiries and Access Requests

Under the UK Data Protection Act 1998, which is replaced by the General Data Protection Regulation (EU) 2016/679 from 25 May 2018, you may request a copy of any of your personal data held by the Data Controller.

Please identify the appropriate Data Controller to contact (refer to Identifying the Data Controller) to make inquires or access requests regarding your personal information.

- If your Data Controller is **not** WDR please refer to that Data Controller's Privacy Notice for their contact details.
- If your Data Controller is WDR there is no fee for this request. Please note, however, that the UK Information Commissioners Office has provided guidance that Data Controllers may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

For requests to WDR the request must be in writing (delivered either by (i) postal service or (ii) email) and must contain the following:

1. Your full name and postal address.
2. Details of your request.
3. Any details which may help us locate the information which is the subject of your request, for example:
 - a. Event Booking reference or date
 - b. Where relevant, your WDR website Logon Username.
4. A photocopy of either your passport, driving licence, or, Other Official ID document, so that we can verify your identity.
5. A photocopy of either a Utility Bill, Driving License, or Bank Statement, so that we can verify your address.
6. Your signature and the date of the request.
7. If you are applying on behalf of another person then signed authority from the individual is required.

WDR understands that there are circumstances where it may be difficult to supply any of the above mandatory requirements. If this is the case please contact WDR and we will seek ways to assist.

How to raise a concern or make a complaint

If you would like more information, have any questions about this policy, wish to make a formal complaint about our approach to data protection, or, to raise privacy concerns, please contact the WDR Data Controller using the contact details in the section [Identifying the Data Controller](#)

If you are not happy with the response you receive after raising the concern or complaint, you can raise your concern with the relevant statutory body:

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Alternatively you can [visit their website](#).

We are registered with the Information Commissioner's Office as a Data Controller under number Z9547555.

Changes to this privacy notice

We reserve the right to revise or modify this privacy notice. If this happens, we will post a prominent notice on our website prior to the change becoming effective.

Last updated: 2018-05-24