



Solutions Ltd

## **Privacy**

**Neurodiverse Work  
Solutions Ltd**

**Effective date:** [Insert date]

Neurodiverse Work Based Training Solutions Ltd (“we”, “us”, “our”) is committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, store, and protect personal information in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

We aim to present this information clearly and accessibly. If you require this policy in an alternative format, please contact us.

## **Policy**

**Based Training**

---

### **1. Data Controller**

Neurodiverse Work Based Training Solutions Ltd is the **data controller** responsible for your personal data.

**Contact details:**

Email: [insert email address]

Address: [insert registered address]

Telephone: [optional]

---

### **2. Personal Data We Collect**

We may collect and process the following categories of personal data:

**a. Identity and Contact Data**

- Name
- Email address
- Telephone number
- Job title and organisation

**b. Training and Service Data**

- Course registrations and attendance
- Feedback, evaluations, and surveys

- Communications with us

### c. Special Category Data

We may process special category data (such as information relating to neurodiversity, health conditions, or learning needs) only where:

- You choose to provide it voluntarily
- It is necessary to provide appropriate support or reasonable adjustments
- You have given **explicit consent**, or another lawful basis applies under Article 9 of UK GDPR

### d. Technical Data

- IP address
  - Browser type and version
  - Website usage and analytics data
- 

## 3. How We Use Your Personal Data

We use personal data to:

- Deliver training and support services
- Communicate with you regarding enquiries, courses, or updates
- Make reasonable adjustments and provide inclusive access to our services
- Improve our training programmes and service delivery
- Meet legal, regulatory, and contractual obligations

We do **not** sell or rent personal data to third parties.

---

## 4. Lawful Basis for Processing

Under UK GDPR, we process personal data using one or more of the following lawful bases:

- **Consent** – where you have clearly agreed
- **Contract** – where processing is necessary to deliver services
- **Legal obligation** – where required by law
- **Legitimate interests** – where necessary for our business and not overridden by your rights

Special category data is processed in accordance with **Article 9 UK GDPR**, primarily with explicit consent.

---

## 5. How Long We Keep Your Information (Data Retention)

We only retain personal data for as long as necessary for the purpose it was collected and to meet legal or regulatory requirements.

Typical retention periods include:

- **Enquiry information:** up to **24 months** from the last contact
- **Client and training records:** up to **6 years** after the end of the service or contract
- **Special category data** (including neurodiversity or health-related information): only for as long as necessary to provide support or reasonable adjustments, and then securely deleted
- **Financial and invoicing records:** **6 years**, in line with UK legal requirements
- **Website and technical data:** typically up to **14 months**

When data is no longer required, it is securely deleted, anonymised, or destroyed.

---

## 6. Data Sharing

We may share personal data only where necessary, including with:

- Trusted service providers (such as IT systems or learning platforms)
- Professional advisers (such as accountants or legal advisers)
- Regulatory or law enforcement authorities, where legally required

All third parties are required to protect personal data and comply with UK GDPR.

---

## 7. Data Security

We take appropriate technical and organisational measures to safeguard personal data, including:

- Secure digital systems
- Restricted access to information
- Confidential handling of sensitive data

We regularly review our security measures to ensure ongoing protection.

---

## 8. Your Rights Under UK GDPR

Under the UK General Data Protection Regulation, you have the right to:

- **Access** your personal data and receive a copy
- **Request correction** of inaccurate or incomplete data
- **Request erasure** of your data where there is no lawful reason for us to keep it
- **Restrict processing** of your data in certain circumstances
- **Object** to the processing of your data
- **Request data portability**, allowing you to receive your data in a usable format

- **Withdraw consent** at any time, where consent is the lawful basis for processing

Exercising your rights will not affect your access to our services unless the data is essential for delivery.

To exercise any of these rights, please contact us using the details provided above. We will respond within **one month**, in line with legal requirements.

---

## 9. Cookies and Website Use

Our website may use cookies and similar technologies to:

- Ensure the website functions correctly
- Improve accessibility and user experience
- Analyse website usage

You can manage or disable cookies through your browser settings.

---

## 10. Complaints

If you are unhappy with how we handle your personal data, you have the right to complain to the **Information Commissioner's Office (ICO)**:

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, Cheshire SK9 5AF  
Website: [ico.org.uk](http://ico.org.uk)

We encourage you to contact us first so we can address your concerns.

---

## 11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be published on our website with an updated effective date.