

# MARSHALL CENTRE WEBSITE PRIVACY NOTICE

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## 1. Introduction

The Marshall Centre website ([www.marshallcentre.com](http://www.marshallcentre.com)) is a company owned by Marshall of Cambridge (Holdings) Ltd (Company number: 2051460, Address: Airport House, The Airport, Newmarket Road, Cambridge, CB5 8RY, England).

This Privacy Notice describes how we collect and use personal information about you before, during and after your training relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to current and former students and apprentices, it also includes enquiries and applications from the general public for the purpose of provision of training, (together referred to as 'you' or 'data subjects'). Our website is not intended for children and we do not knowingly collect data relating to children.

Marshall Centre is a "data controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information gained from various sources. We are required by law to notify you of the information contained in this Marshall Centre Privacy Notice.

It is important that you read and retain this document.

We may update this document at any time and the latest version will always be available on the Marshall Centre website, but we will send you by email, a new Marshall Centre Privacy Notice if any significant changes are made.

## 2. Responsibilities

- 2.1 The Data Privacy Manager is responsible for ensuring that this notice is made available to data subjects prior to Marshall Centre collecting/processing their personal data.
- 2.2 All Employees/Staff of Marshall Centre who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention.

## 3. Privacy notice

### 3.1. Who are we?

In the context of this Privacy Notice 'Marshall of Cambridge (Holdings) Ltd' refers to a group of different legal entities, details of which can be found [here](#),

This Privacy Notice is issued on behalf of the group of companies known as Marshall of Cambridge (Holdings) Ltd, so when we refer to 'Marshall Centre', 'Marshall', 'The Centre', 'Marshall ADG', 'The Company', 'we', 'us' or 'our' in this Privacy Notice, we are referring to the relevant company responsible for processing your personal data.

The entity which will be the controller for your data is the entity with which you have provided personal information.

If you access any services from other Marshall of Cambridge (Holdings) Ltd legal entities then these will be covered by a separate Privacy Notice.



Marshall Centre are a training organisation based in Cambridge, UK. The Marshall Centre provides:

- Training to industry which includes, but is not limited too;
- funded apprenticeships to both new staff entering the business, and to existing staff for personal development. These apprenticeships are monitored for funding compliance by the ESFA, and for quality of delivery by Ofsted;
- Professional qualifications, including but not limited to Association of Project Management & IOSH;
- on-line training;
- bespoke training;
- Assist an individual or organisation in Aerospace Technical Training services.

Our Data Privacy Manager can be contacted using the details provided in Para 3.12.

### **3.2. Personal data types:**

Personal data is any information that identifies a living individual such as name, passport, driving license, an identifying number (e.g. National Insurance No, Clock/Candidate No, DOB), location or physical characteristics associated to that individual. It can be an opinion of someone, or any information that when combined identifies the person.

In the context of this document this data will be referred to as ordinary. Some personal data is classed as “special category data”.

This is data referring to race/ethnicity, religious beliefs, sexual orientation, political opinions, information about your health, genetic and biometric information and criminal records.

We are committed to protecting the privacy of any personal data that you may submit to the website. Generally, you can visit the website without revealing who you are, or disclosing any personal data about yourself. However, there may be times when we require personal data about you

when you wish us to carry out an action on your behalf. Such personal data is obtained only when voluntarily submitted by you and is subject to the provisions set out on this page.

### **3.3. We may collect and process the following personal data about you:**

The Personal Identifiable Information we could use is: -

#### **Ordinary personal data**

- your name, address and contact details including email address, telephone number, date of birth, place of birth and gender;
- information for security providing identification, e.g. passport/visa details, driving license or other photo identification;
- information about your next of kin and personal/emergency contacts;
- brief description of your enquiry for general enquiries or reporting a problem with the website;

#### **Special category personal data**

The special categories of personal data concerned are:

- information about racial or ethnic origin
- information about health, medical conditions

**3.4. The personal data we collect will be used for the following purposes:**

We need to process data for many independent training purposes in support of our legitimate business interests. These include:

- fulfilling our regulatory and legal obligations;
- fulfilling our contractual obligations with employers and 3rd parties;
- to hold evidence of training for auditing purposes by Quality Management Organisations;
- to allow government funding to be accessed in regard to Apprenticeships;
- supply you with courses through an educational awarding body e.g. City & Guilds;
- supply you with goods, services and information which you have requested;
- providing you with information, products or services that you request from us which we feel may interest you, unless you have indicated otherwise;
- notifying you about changes to our services;
- ensuring that content from our services is presented in the most effective manner for you and for your computer;
- analysis so that we can administer, support, improve and develop our services & special category demographic.

### **3.5. Automated technologies or interactions.**

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns, we collect this data by using cookies. This could include:

- usage data includes information about how you use our website, products and services;
- technical data includes internet protocols (IP), 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 this website;
- details of your visits to the website including, but not limited to, traffic data, locations data, weblogs and other communication data and the resources that you access.

Further details of our Cookie Policy.

### **3.6. Legal basis for processing data.**

Our legal basis for processing personal data is to comply with our legal and contractual obligations. For example:

- we are required to hold training records to comply with European Commission Regulation 1321/2014, Annex IV (Part-147) and, for non-UK residents, UK Government Security requirements;
- we are required to hold data to allow government funding to be accessed
- demonstrate compliance with European Commission Regulation 1321/2014;
- to comply with Employment Law - information about health or medical conditions;
- to comply with the Equality Act - information about ethnic origin. This is done for the purposes of equal opportunities monitoring.

Laws that currently apply to personal data include, (but are not limited to);

- the Equality Act;
- Employment Law.
- Disability Act (reasonable adjustment)

We have a legitimate interest pursued by us, or authorised third parties we use (as detailed in paragraph 3.8), in processing personal data before, during and after the end of the training provided or contract. Processing personal data allows us to:

- maintain accurate and up-to-date training records and contact details, (including details of who to contact in the event of an emergency);
- hold evidence of training for auditing purposes by e.g. UK Civil Aviation Authority, Quality Management Organisations, awarding bodies;
- arrange security passes and access onto site;
- ensure correct and appropriate training and examination delivery;
- satisfy contractual requirements with third parties and employers;
- respond to and defend against legal claims.

### **3.7. If you give us someone else's personal data**

Sometimes you might provide us with another person's personal data – e.g. details of your emergency contact or next of kin. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.



### 3.8. Disclosure

Your information may be shared internally with Marshall of Cambridge (Holdings) Ltd employees, depending on the nature of your training, enquiry or request and if access to the data is necessary in the performance of their role.

If your request relates to: We may share your data with the following:

**EASA regulatory courses** European Aviation Safety Agency (EASA)  
Your employer  
Quality management organisations  
The company Training Management System

**Purchase of online courses** Connected Shopping Ltd – for provision of courses from our  
Virtual Learning platform (Moodle)  
Access Planit (Training booking portal)

**Education & Awarding bodies** (C&G, CMI, APM and associated EPA's)  
Apprenticeships  
ESFA (Education & Skills Funding Agency)  
OFSTED

**Aircraft technical training**

UK Civil Aviation Authority  
European Aviation Safety Agency (EASA)  
National security agencies (UK MoD, UK Government)  
Your employer  
Quality management organisations  
The Company training management system  
Sub-contracted training providers

**3.9. Retention period**

Where training has been delivered in accordance with the European Commission Regulation 1321/2014 Part-145, records will be retained indefinitely as detailed at, <https://www.caa.co.uk/Commercial-Industry/Aircraft/Airworthiness/>

Other personal data relating to training records will be held in accordance with contractual, regulatory and awarding body regulations or to support our legitimate business interests.

However, where data retention is not specified in the contract, personnel data pertaining to the fulfilment of the contract will be held for the duration of either 2 years from the last activity or upon end of contract, (dependent on legitimate business interests), at which point the data will be securely destroyed. This is detailed in the Marshall ADG Data Retention Policy which can be accessed from our Marshall ADG website <https://marshalladg.com/legal/privacy-notice>

### 3.10. Our rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you;
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected;
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.;
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing;
- Right of portability – you have the right to have the data we hold about you transferred to another organisation;
- Right to object – you have the right to object to certain types of processing;
- Right to object to automated processing, including profiling – you have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene. (Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation);
- In the event that Marshall refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in Clause 3.9 below.

All your rights identified above apply to any third party (as stated in 3.6 above) should they be involved in the processing of your personal data.

If you would like to exercise any of these rights, please contact the company Data Privacy Manager, Isobel Aylott, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, Marshall ADG, Airport House, Newmarket Road, Cambridge, Cambridgeshire, CB5 8RX.

You can make a subject access request by completing the organisation's Subject Access Request Form which is available from [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com)

### 3.11. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Marshall ADG (or third parties as described in 3.6 above), or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall ADG's Data Privacy Manager, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority.

### 3.12. Contact Details

The details for key personnel are:

Role: Data Privacy Manager  
Contact Name: Isobel Aylott  
Address: Marshall ADG, Airport House, Newmarket Rd, Cambridge, CB5 8RX  
Email: [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com)  
Telephone: 01223 373206  
Website: [www.marshalladg.com](http://www.marshalladg.com)

Role: Supervisory Authority  
Contact Name: Information Commissioners Office (ICO)  
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Email: <https://ico.org.uk/global/contact-us/email/>  
Telephone: 03031231113  
Website: <https://ico.org.uk/concerns/>

*Note that the recommended method of communication to the ICO is via their website.*

## 4. Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available on the Marshall ADG and Marshall Centre websites.

Issue	Description of Change	Approval	Date of Issue
1.1	Amendments incorporated after legal review	Data Privacy Manager	23/05/18
1.2	Updated to reflect changes in Company Internet	Data Privacy Manager	07/03/19
1.3	Updated to reflect Training Delivery rebranding (AeroAcademy to Marshall Centre)		