

1. Introduction

Sava is committed to protecting personal data. This privacy notice describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection.

Sava processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data. To find out more about our specific processing activities, please go to the relevant sections of this statement.

2. Our privacy promise

We promise to:

- collect, use and store your personal data in a safe and secure way.
- only use your personal data for the specific purposes stated
- keep you informed about how we use your information and who we give it to

3. Company information

Sava Limited (Sava) is a limited company registered in England & Wales under registration number 01753762. The registered address of the company is 4 Mill Square, Featherstone Road, Wolverton Mill, Milton Keynes, MK12 5ZD. You can contact us at hello@sava.co.uk

4. Our processing activities

4.1. Business and individual contacts

Collection of personal data

Sava processes personal data about contacts (existing and potential Sava customers and/or individuals associated with them) using a customer relationship management system (the "Sava CRM").

The collection of personal data about contacts and the addition of that personal data to the Sava CRM is initiated by a Sava user and will include name, employer name, contact title, phone, email and other business contact details. In addition, the Sava CRM may collect data from Sava email (sender name, recipient name, date and time) and calendar (organiser name, participant name, date and time of event) systems concerning interactions between Sava users and contacts or third parties.

Use of personal data

Personal data relating to business contacts may be visible to and used by Sava users to learn more about a contact or opportunity they have an interest in, and may be used for the following purposes:

- Administering, managing and developing our businesses and services
- Providing information about us and our range of services
- Making contact information available to Sava users
- Performing analytics such as trends and performance

Sava do not sell or otherwise release personal data contained in the Sava CRM to third parties for the purpose of allowing them to market their products and services without consent from individuals to do so.

Data retention

Personal data will be retained on the Sava CRM for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a business contact).

4.2. Customers undertaking a qualification

Collection of personal data

Our policy is to collect only the personal data necessary for delivering the qualification and to only share personal data where it is strictly needed for those purposes.

User of personal data

Personal data is accessed and processed by a Sava user for the purposes of ensuring that the customer (“learner”) meets the necessary criteria for achieving the qualification. Due to the nature of qualifications, the information (with the exception of any billing and financial information) is also accessed and processed by authorised third parties, these being:

- qualification assessors, who assess the learner’s portfolio
- where relevant, the appropriate awarding body for a qualification

As with any provider of qualifications and other professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Data retention

Personal data will be retained on the Sava learning systems for as long as necessary for us to fulfil our contract with the customer and as determined by any awarding body.

4.3. Suppliers and subcontractors

Collection of personal data

We collect and process personal data about our suppliers (including subcontractors such as qualification assessors) in order to receive services from our suppliers and to provide professional services to our clients.

User of personal data

We use personal data for the following purposes:

- Receiving services. We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with cleaning services, we will process personal data about those individuals that are providing services to us.
- Providing professional services to clients. Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients (for example, where our supplier is providing people to work with us as part of a Sava team providing professional services to our clients).

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

4.4. Others who get in contact with us

Collection of personal data

We collect personal data when an individual gets in touch with us with a question, complaint, comment or feedback (such as name, contact details and contents of the communication). In these cases, the individual is in control of the personal data shared with us and we will only use the data for the purpose of responding to the communication.

5. Collection and Use of Personal Information on the sava.co.uk website

In general, you can browse our web site without giving us any personal information. We use several products to analyse traffic to this web site in order to understand our visitors' needs and to continually improve our site for them. There are additional activities on our site that require you to be registered. For example, to access our online software or assessment centre. If you want to request more information about our products and services there are also "contact us" forms where we ask you for your basic contact information. By filling in one of these "contact us" forms, you are agreeing to us contacting you. Your details will be put on the Sava CRM and we will keep you up to

date with relevant information. You may contact us and ask us to remove this information at any time.

6. Use of Cookies on the sava.co.uk website

A cookie is a small text file containing information that a web site transfers to your computer's hard disk for record-keeping purposes and allows us to analyse our site traffic patterns. A cookie cannot give us access to your computer or to information beyond what you provide us. Most web browsers automatically accept cookies; consult your browser's manual or online help if you want information on restricting or disabling the browser's handling of cookies. When you first log on to the Sava website, you are asked to "agree" to our cookie policy. At this stage there is also a link to more details on our cookie policy.

7. 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. We will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Changes to this privacy notice

We will keep this privacy notice under regular review. This privacy notice was last updated on 25 May 2018.

9. Individuals' rights and how to exercise them

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

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Right to opt-out of automated profiling of your personal data
- Request transfer of your personal data
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us. Please see additional information below regarding your rights.

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 or delete 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 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.

Withdrawal of consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data please email us at hello@sava.co.uk, or to stop receiving an email from a Sava marketing list, please click on the unsubscribe link in the relevant email received from us.

10. Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to hello@sava.co.uk. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO website.