# Privacy Policy

## 1. Introduction

This Privacy Policy (together with our terms and conditions and any other documents referred to in it) describes the type of information that we collect from you ("you/your") through the use of our services ("Services"), or the use of our website www.cotstraining.co.uk ("Website"), how that information may be used or disclosed by us and the safeguards we use to protect it.

Our Website and Services may contain links to third party websites that are not covered by this Privacy Policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

We have drafted this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it. By using or accessing our Website or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy. This Privacy Policy may change from time to time and your continued use of the Website, or the Services is deemed to be acceptance of such changes, so please check periodically for updates.

Please check back regularly to keep informed of updates to this Privacy Policy. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using our Website immediately.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you have any comments on this Privacy Policy, please email them to James Mowforth james@cotstraining.co.uk

## 2. Who We Are

2.1 Here are our details:

- Our Website address is www.cotstraining.co.uk
- Our company name is Commercial Operator Training Solutions Ltd
- Our trading name is As Above
- Our registered address is:

Skills House, Tank Farm Road, Llandarcy, Neath, SA10 6EN

- Our trading address is As Above

- Our nominated representative is the Compliance Director and can be contacted at sharon@costraining.co.uk

2.2 We respect your right to privacy and will only process personal information about you or provided by you in accordance with the Data Protection Legislation which for the purposes of this Privacy Policy shall mean: (i) the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR), (ii) the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the UK GDPR or the Data Protection Act 2018 and other applicable privacy laws.

**3. What we may collect**

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier. When you email, phone, live chat or otherwise, we may collect information such as your first name, last name, email address and phone number
- Contact Data includes billing address, invoicing address, email address and telephone numbers
- Financial Data includes bank account and payment card details
- Transaction Data includes details about payments and other details of our Services you have purchased from us
- Technical Data includes internet protocol (IP) address, your login data, 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
- Profile Data includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses
- Usage Data includes information about how you use our Website and Services
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences
- Interaction Data includes any information that you might provide to any discussion forums on the Website
- Cookies Data like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our Website. Please refer to the "Do we use 'cookies'?" section below for information about cookies and how we use them and what kind
- Third Parties and Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or through the Services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our Website.
  We are also working closely with third parties (including, for example, business partners, suppliers, sub-contractors, advertising networks, analytics providers, and search information providers) and may receive information about you from them

- Analytics includes third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy

3.3 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

3.4 Where we do collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) and it is necessary to do so for our business, we will obtain your specific consent, unless we have another lawful basis to do so.

3.5 Under UK GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

a. You have given consent to the processing of your personal data for one or more specific purposes

b. processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract

c. processing is necessary for compliance with a legal obligation to which we are subject

d. processing is necessary to protect the vital interests of you or of another natural person

e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

f. processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular, where the data subject is a child

3.6 If you provide personal information to us about another data subject, you are responsible for ensuring that you have their consent to provide that data for the uses set out in this Privacy Policy and for bringing this Privacy Policy to their attention.

**4. How we may collect and use your data**

4.1 We (or third party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information by way of different methods to collect data from and about you including through:

Direct interactions. You may give us your information by filling in forms via our Website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

a. present Website content

b. use any of our Services

c. create an account on our Website

d. subscribe to our Services or publications

e. request marketing to be sent to you

f. enter a competition, promotion or survey

g. give us some feedback

4.2 In addition to the above, we may use the information in the following ways:

a. To personalise your Website experience and to allow us to deliver the type of content and product offerings in which you are most interested

b. To administer a contest, promotion, survey or other site feature

c. If you have consented to receive our e-mail newsletter, we may send you periodic e-mails. If you would no longer like to receive promotional e-mails from us, please refer to the "How can you opt-out, remove or modify information you have provided to us?" section below. If you have not opted-in to receive e-mail newsletters, you will not receive these e-mails. Visitors who register or participate in other site features such as marketing programs and 'members-only' content will be given a choice whether they would like to be on our e-mail list and receive e-mail communications from us

d. Present Website content effectively to you

e. Provide information, and services that you request, or (with your consent) which we think may interest you

f. Carry out our contracts with you

g. Provide the relevant Services to you

h. Tell you our charges

4.3 If you are already our customer, we will only contact you electronically about things similar to what was previously sold to you.

4.4 If you are a new customer, you will only be contacted if you agree to it.

4.5 We may keep a record of those links which are used the most to enable us to provide the most helpful information but we agree to keep such information confidential and you will not be identified from this information.

4.6 In addition, if you don't want us to use your personal data for any of the other reasons set out in this section in 4, you can let us know at any time by contacting us at james@cotstraining.co.uk and we will delete your data from our systems. However, you acknowledge this will limit our ability to provide the best possible services to you.

4.7 In some cases, the collection of personal data may be a statutory or contractual requirement, and we will be limited in the services we can provide you if you don't provide your personal data in these cases.

4.8 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

a. Where we need to perform the contract we are about to enter into or have entered into with you

b. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

c. Where we need to comply with a legal or regulatory obligation, for example compliance with health and safety, tax or other statutory obligations

4.9 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to our marketing communications or sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at james@cotstraining.co.uk and we will either delete your data from our systems or move your data to our "unsubscribe list". However, you acknowledge this will limit our ability to provide the best possible services to you.

4.10 As already indicated above, with your permission and/or where permitted by law, we may also use your data for marketing purposes which may lead to us contacting you by email and/or telephone with information, news and offers on our Services. We agree that we will not do anything that we have not agreed to under this Privacy Policy, and we will not send you any unsolicited marketing or spam. We will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the UK GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended.

**5. Cookies**

5.1 All Cookies used by and on our website are used in accordance with current UK Cookie Law.

5.2 We use cookies to distinguish users and improve our Website. Please look at our Cookie Policy for more cookie information.

**6. Where we store your data and security**

6.1 We may transfer your collected data to storage outside the UK. It may be processed outside the UK to fulfil your order and to receive our Services and deal with payment. If we do store or transfer data outside the UK, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the UK GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties we engage with and the use of approved Model Contractual Arrangements. Your acceptance of this Privacy Policy shall be your consent permitting us to store or transfer data outside the UK if it is necessary for us to do so.

6.2 Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Website. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

6.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6.4 By giving us your personal data, you agree to this arrangement. We will do what we reasonably can to keep your data secure.

6.5 Any payments made by you, will be encrypted.

6.6 We have implemented security measures such as a firewall to protect any data and maintain a high level of security.

6.7 Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

6.8 If we give you a password upon registration on our Website, you must keep it confidential. Please don't share it.

6.9 We will keep personal data for as long as is necessary which is usually the life of our relationship and up to a period of seven years after our relationship have ended. We may however be required to retain personal data for a longer period of time to ensure we comply with our legislative and regulatory requirements. We review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged to.

**7. Disclosing your information**

7.1 We are allowed to disclose your information in the following cases:

7.1.1 If we want to sell our business, or our company, we can disclose it to the potential buyer.

7.1.2 We can disclose it to other businesses in our group.

7.1.3 We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights.

7.1.4 We can exchange information with others to protect against fraud or credit risks.

7.2 We may contract with third parties to supply services to you on our behalf. These may include payment processing, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. These are the third parties that have access to your information:

- RTITB
- NPORS

- City & Guilds
- DVSA
- SQA
- Highfield
- ALLMI
- CITB
- CILT
- JAUPT
- PASMA
- IPAF
- Lloyds CardNet
- CPCS

7.3 Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under UK GDPR and the law. Any third party that we share data with will not be permitted to use it for any other purpose than fulfilling their contract with us.

**8. Your rights**

8.1 When you submit information via our Website, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided above in this Privacy Policy).

8.2 Under the UK GDPR, you have the right to:

- request access to, deletion of or correction of, your personal data held by us at no cost to you
- request that your personal data be transferred to another person (data portability)
- be informed of what data processing is taking place
- restrict processing
- to object to processing of your personal data
- complain to a supervisory authority

8.3 You also have rights with respect to automated decision-making and profiling as set out in section 11 below.

8.4 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

8.5 To enforce any of the foregoing rights or if you have any other questions about our Website or this Privacy Policy, please contact us at:

Commercial Operator Training Solutions Ltd, Skills House, Tank Farm Road, Llandarcy, Neath, SA10 6EN.

Or james@cotstraining.co.uk

**9. Links to other sites**

9.1 Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our Website. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

**10. Changes**

10.1 If we change our Privacy Policy, we will post the changes on this page so please check this page for our current policy.

**11. Automated Decision-Making and Profiling**

11.1 In the event that we use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on you, you have the right to challenge to such decisions under UK GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from us.

11.2 The right described in section 11.1 does not apply in the following circumstances:

a. the decision is necessary for the entry into, or performance of, a contract between the you and us

b. the decision is authorised by law

c. you have given you explicit consent

11.3 Where we use your personal data for profiling purposes, the following shall apply:

a. Clear information explaining the profiling will be provided, including its significance and the likely consequences

b. Appropriate mathematical or statistical procedures will be used

c. Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented

d. All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling

**12. Your agreement**

12.1 By using our Website and by way of acknowledgment, you agree to our Privacy Policy.

**13. Dispute Resolution**

13.1 We will use our best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it.

13.2 Any dispute shall not affect our ongoing obligations under this Privacy Policy.

13.3 This Privacy Policy and any dispute or claim relating to or connected with it (including non-contractual disputes or claims) shall be governed by and construed in accordance with the laws of England and Wales and the courts of England and Wales are the only place where disputes or claims relating to or connected with this Privacy Policy (including non-contractual disputes or claims) may be decided.

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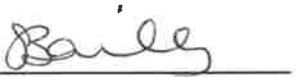
| Name & Signature: |  |
| Position: | Compliance Director |
| Company Name: | COTS Training Ltd |
| Date: | February 2026 |
| Date for next review: | February 2027 |