



PRIVACY NOTICE – APPRENTICESHIP PROGRAMMES

EFFECTIVE DATE: 01 April 2024

The privacy of your personal information is important to us at Vertex Company UK 1 Limited, a V2X company, trading as Vertex Professional Services (in the following “VPS”).

This Privacy Notice describes the personal information that we collect from you, or that you provide, and how we use it, when you:

- visit or use of any of our websites or systems;
- apply for an apprenticeship vacancy
- take benefit of our vocational, educational or training services (together the "Services"); or
- communicate with us.

It is important that you read this Privacy Notice carefully together with any other privacy notice(s) or fair processing notice(s) we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this Privacy Notice from time to time as our services and privacy practices change, or as required by law. The effective date of our Privacy Notice is stated above. Please just visit <https://www.hondaapprenticeships.co.uk/files/VPS-Privacy-Notice.pdf> if you want to stay up to date, as we will post any changes there.

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1.0 WHO WE ARE - CONTROLLER

Vertex Company UK 1 Limited, trading as Vertex Professional Services is a company registered in England and Wales under number 13672353 whose registered office is at Building 3 Units 3.3 and 3.4.3 Caldecotte Lake Business Park, Milton Keynes, MK7 8LF.

Vertex Company UK 1 Limited is the controller (referred to as “VPS”, “we”, “us” or “our” in this Privacy Notice) and is responsible for your personal data.

You can reach us under “Contact Us” (see section 10).

Third Party Links

This website and the systems you use as part of your apprenticeship programme with us may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or systems, we encourage you to read the privacy notice of every website you visit.

2.0 WHAT PERSONAL DATA DO WE PROCESS?

The types of personal data relating to you that we may process depends on your interaction with us. The key types of personal data that we may process are set out below:

- Your name and contact details (such as your address, telephone number(s) and email address)
- Your date of birth, national insurance number, unique learner number, UK driver’s license details including endorsements, transport (Y | N)
- Entitlement to work information: such as evidence of citizenship, right of abode, right to work/permission
- Job related information: such as your resume including your current employment details (e.g. employer name and contact details, apprenticeship agreement, etc.), past employment and positions, education, professional qualifications and registrations, reference contact information, position preferences, hobbies and interests.
- Interview Process: video recording(s) and digital assessments.
- Education and training information: unique learner number, training completions, training and progress reports with electronic evidence in the form of photograph(s), audio and video recording(s) and digital assessments to be used towards your chosen framework(s) or standard(s).
- Diversity monitoring information: such as information regarding your age, gender, race and ethnicity (where permitted and to the extent required for diversity monitoring purposes).
- Information required by government authorities or agencies such as the Education and Skills Funding Agency (ESFA), Skills Development Scotland (SDS) and the Office for Standards in Education, Children’s Services and Skills (Ofsted).
- Usage data about how you use our websites or systems, e.g. IP address and server logs

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- Any information you provide us (including during an interview or during the course of any correspondence you may have with us)
- **Special Category Data:** We may also collect special category data also known as sensitive data:
 - Health Data: Medical condition, learning difficulty or disability status,
 - Ethnicity

The above information may be provided either directly from you, your parents, your employer, or obtained through government systems, e.g. the Learning Records Service.

YOUR DUTY TO INFORM US OF CHANGES

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.

3.0 HOW DO WE USE YOUR INFORMATION ABOUT YOU

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and the legal grounds for the collection processing and use of personal data:

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Processing Purposes	Lawful Basis for Processing
To evaluate your application for an apprenticeship vacancy and sharing the information provided with your potential employer	Legitimate interests: <ul style="list-style-type: none"> • Checking your eligibility for an apprenticeship • Matching you against our vacancies for apprenticeships • Shortlisting applicants for interview that meet the criteria set by an employer. • Responding to your communications with us
To administer, manage and provide you training to achieve your apprenticeship qualification/standard and where required to provide evidence of your progress To facilitate communication with you about your training (including in cases of emergency)	<ul style="list-style-type: none"> • Necessary for the compliance with a legal obligation to which VPS is subject • Necessary for the purposes of the legitimate interests pursued by VPS - as stated in the left-hand column
To obtain government funding for your apprenticeship. To comply with the funding rules and other legal and contractual requirements imposed on us by: <ul style="list-style-type: none"> • the Education & Skills Funding Agency • Skills Development Scotland • the Office for Standards in Education, Children’s Services and Skills (Ofsted) 	<ul style="list-style-type: none"> • Necessary for compliance with a legal obligation to which VPS is subject • Necessary for the purposes of the legitimate interests pursued by VPS - as stated in the left-hand column • Necessary for the performance of tasks in the public interest – education/vocational training.

<p>To monitor your use and ensure secure use of our website and systems (including our LMS, any apps and tools you use on the Apprenticeship Programme)</p>	<p>Legitimate Interests:</p> <ul style="list-style-type: none"> • Necessary for compliance with a legal obligation to which VPS is subject • to monitor how our site and systems are used, and to detect and prevent fraud, other crimes and the misuse of our website and systems
<p>In relation to Health Data: – to understand if you have any health conditions or special needs which you consider may affect your performance at work and/or interview and to make your potential employer aware to the extent needed so support can be provided to you, where required. - To ensure your welfare, and health and safety - To potentially gain funding for additional learning support during your apprenticeship - To provide the information to the DfE / ESFA to fulfil its statutory duties.</p>	<p>Consent: We ask for your consent to use the health data you provide in your application, during the programme and during our communications with you and will not process this data without your consent.</p>
<p>In relation to your ethnicity: To provide evidence to the government funding bodies and other authorities of compliance with diversity requirements</p>	<p>Consent: We ask for your consent to use details about your ethnicity and we will not process this data without your consent.</p>

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

4.0 DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above.

Internal Third Parties: V2X Company and its affiliates, and

External Third Parties:

- Your employer
- Honda Motor Europe Limited

- Service providers or suppliers such as IT and system hosting and administration providers, assessment or training related service providers, awarding bodies and end point assessment agencies etc.
- Department for Education, Education and Skills Funding Agency (ESFA) and Skills Development Scotland (SDS)
- Modern Apprenticeships Online Scotland
- Ofsted – Office for Standards in Education, Children’s Services and Skills
- Health or social welfare authorities providing community care services
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- VPS may transfer personal information in connection with the sale, merger or acquisition of one or more of its businesses or subsidiaries to a different company that agrees to offer equivalent safeguards for the use and disclosure of such information.

HM Revenue & Customs, law enforcement authorities, government regulators and other authorities where 1) where such disclosure is required or permitted by law; (2) to protect VPS’s legal rights to the extent authorized or permitted by law; or (3) in an emergency where the health or safety of You or another individual may be endangered.

INTERNATIONAL TRANSFERS

VPS belongs to V2X Company a global leader in technology-driven solutions. For some of our services VPS may transfer your personal data outside the United Kingdom.

Safeguards for international transfers of Personal Data:

In cases where VPS needs to transfer personal data to countries not deemed to have adequate protection it shall ensure that adequate safeguards, as required under applicable data protection legislation, will be implemented.

5.0 PROTECTING YOUR PERSONAL DATA

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. 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.

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.

6.0 DATA RETENTION

Your personal data is retained by us for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. At a minimum the information outlined in this Privacy Notice will be kept in line with the ESFA (Education & Skills Funding Agency), Skills Development Scotland & ESF (European Social Fund Programme Contract).

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7.0 CHOICES

Where we need to collect personal data in relation to your participation in the apprenticeship programme, and you fail to provide that data when requested, we may not be able to continue providing the apprenticeship programme for your benefit. We will notify you if that is the case.

8.0 YOUR RIGHTS

You have the right to:

- **Request access** to a copy of the information we hold about you
- **Request correction** of any inaccurate or incomplete personal data we hold about you.
- **Request erasure (right to be forgotten):** of personal data where there is no compelling reason for its continued processing
- **Object to the processing** of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the transfer** of your personal data to you or to a third party
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Withdraw the consent** you have given at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of the processing prior to your withdrawal of consent. If you withdraw your consent we may not be able to provide certain services to you or you may not be able to receive government support. We will advise you if this is the case at the time you withdraw your consent.
- **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.

If you wish to exercise any of the rights set out above, please contact us.

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 for the administrative costs if your request is manifestly unfounded or excessive. We may also charge a reasonable fee if you request further copies of your data following a request. 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

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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.

9.0 CONTACT US

If you have any questions about this privacy notice, including any requests to exercise your rights please contact the Privacy Team using the details set out below.

Contact Details

Name: Maria de Freitas Ebert

Email address: privacy.emea@gov2x.eu

Postal address:

Vertex Professional Services – Apprenticeship Programmes
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