Privacy Notice

Privacy Notice

The following information explains how West Herts College (WHC) Group collects, retains and uses any data we collect on you as an individual. Up until 24 May 2018 any personal data held by the College was used in accordance with the Data Protection Act. From 25 May 2018 personal data will be kept and used in accordance with General Data Protection Regulations (GDPR).

When do you collect my data?

At West Herts College (WHC) Group we collect your data in a limited number of ways at key points.
In addition to gaining information from you online data is also taken from you at moments such as when:

You make an enquiry
•   For example: register to attend a business event; a request to send you a prospectus; use our webchat facility; register to visit us on an open day, or when asking a question via the 'Got a question' page.

You apply or enrol
•   For example: when you complete an application form or enrolment form.

Please note: We take only the minimum data required to continue processing your application. Your application form is the paperwork we hold prior to you attending an interview/ introduction meeting or paying any course fees. The enrolment stage follows this at the beginning of the course – when you will sign a Learning Agreement and/or pay any course fees.

What data do you collect when I'm browsing your website?

Our monitoring of site activity includes recording the popularity of the site, visits to individual pages and typical user paths through the site. The data we may collect here could include IP address, the pages you visited and for how long.

Cookies
We use cookies and pixels to optimise your experience on our site to provide social media features and analyse traffic to site pages. Cookies and pixels are small pieces of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing.

This means that when you're browsing for a particular course and leave our site, you might start to see advertisements inviting you back to our website to pick up where you left off or browse similar courses related to those, you're interested in. It also enables us to report on the number of visitors to a particular course page, this helps us know which of our programmes are more popular and allows us to shape future provision accurately.

On our website we use first-party cookies, such as the Google Analytics cookie, and third-party cookies and pixels through our trusted social media, advertising and analytics partners (such as Google advertising cookies, Facebook pixels and Retargeting pixels). By continuing to use our website and/or live chat you consent to our use of cookies and pixels – you can learn more about the use of these below.

Google Analytics

We use Google Analytics to monitor traffic on our website, this allows us to measure the quantity of visitors to a particular section of the site and report on overall site performance by considering a number of metrics – you can learn more about Google Analytics **here**. While Google Analytics enables us to report on the number of visitors to the site, it does not allow us to identify users directly.

As with our use of cookies, we keep track of Google Analytics data to help shape our curriculum offer and understand better which courses are more popular for our site users.
To enable us to improve each year, we use the figures provided by Google to compare key site metrics such as: unique visitors to a page, number of applications to a course, page abandonments and error reports. These allow us to improve your experience on our site.
Our retention for Google Analytics data is currently set to 38 months.

You can opt-out of Google Analytics Advertising Features through Ads Settings, Ad Settings for mobile apps, or any other available means (eg, the NAI's consumer opt-out).

Facebook

To help our online community find courses and updates that are relevant to them, we use Facebook advertising features to share these messages with users. We use a Facebook pixel on our site to monitor the pages that you visit, this enables us to make sure that when we advertise on Facebook, you'll only receive adverts relevant to your interests.

This pixel is a tiny piece of JavaScript code that we have incorporated into each of our web pages – it provides a series of functions for transmitting application-specific events and user-defined data to Facebook. The pixel records information about your browsing session, which it sends to Facebook, along with a hashed version of the Facebook ID and the URL viewed, enabling us to share content directly related to the courses you visit.

We also use a conversion pixel to follow the actions of users after they are redirected to our website having clicked on a Facebook advertisement. You can read more about this in Facebook's own Privacy Policy **here**, if you'd like to revoke your consent for conversion tracking or review your Facebook ad settings, click **here**.

Retargeting/Display advertising

West Herts College (WHC) Group collects some data about your activities that does not personally or directly identify you when you visit our website, the website of entities for which we serve advertisements (our "Advertisers") or the websites and online services where we display

advertisements ("Publishers").

This information may include the content you view, the date and time that you view this content, the courses you apply for, or your location information associated with your IP address. We use the information we collect to serve you more relevant advertisements (referred to as "Retargeting"). We collect information about where you saw the ads we serve you and what ads you clicked on.

Livechat (Giosg)

If you use the livechat function on our site, you are consenting to the privacy policy of Giosg Ltd, which can be accessed **here**. West Herts College (WHC) Group tracks and stores the following visitor personal data via the chat function:
- IP address
- Content of chat conversations
- Visited URLs
- Referrer URL
- Timestamp
- Operating system
- Device
- Browser

Akero (NetNatives)

We use Akero forms and landing pages to capture data, these data capture points are used to manage general enquiries, open event registration and course interest. When you submit data to these forms you will be prompted to opt in to wider communications, should you wish to receive them.

Your personal data will be stored securely in Akero and will only be used to contact you regarding the event, course or enquiry related to your submission. We will keep this data until the end of the academic cycle (October half term) in which you submitted it to us. For more information on how your data is stored, please refer to the NetNatives privacy policy **here.**

Any sensitive personal data will be collected transparently through the forms mentioned in the above section.

If you pay online for a course with West Herts College (WHC) Group, your card details are not shared with or stored by us – this element of the transaction is processed by our chosen third party provider – currently PayPal.

How long do you keep my data?

We keep your data only for legitimate reasons and processing. The period for this is set, but we will give you the option to grant consent to keeping your data longer than usual so we can stay in touch for an extended period.

Our Retention Schedule is an outline of how long we keep personal data and on whom. This schedule is in line with legitimate interest (ie, to provide you with a good service). Dates for deletion may be extended with your consent. You can find our full retention schedule **here**.

Here are some examples of our data retention schedule

- If you **apply** for a full-time course, we will keep your personal data for up to two years.

- If you **enrol** on a full-time course, we will keep your personal data for up to six years after your most recent enrolment.

- If you **register** to attend an open day, we will keep your personal data until the end of that application cycle.

What are my rights regarding my personal data?

The key rights you should be aware of are as follows.

You can:
- Withdraw consent (where this is the College's legal basis for processing/retaining your data).

- Rectify any inaccuracies in personal data we hold about you.

- Access a full report of your personal data that we process.

- Be forgotten – that is have your details removed from our systems that we use to process your data.

- Restrict/object to certain aspects of the processing of your data.

Please see **https://ico.org.uk/** for further information on the above rights. You may also contact the West Herts College (WHC) Group **Data Protection Officer** for further information. Access to our other relevant policies and procedures can be found **here**.

Who do you share my information with?

The College is legally obliged to share some of your details with third-parties, eg funding bodies, exam boards, local authorities and in exceptional circumstances with public services such as the police and other emergency services.

What will you do with my data?

With your consent we may contact you by email from time to time to keep you up to date with

the College's latest offers and courses.

There will be a clear 'unsubscribe' button at the bottom of each email should you change your mind. Should you wish to join/rejoin this mailing list, please contact **admissions@westherts.ac.uk**

whc
group