

HubL Norwich CIC – Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Email - contact@hubl.org.uk

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Website user information (including user journeys and cookie tracking)

We also collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Racial or ethnic origin

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)

- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legitimate interests** - we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in supporting you in attending an assessment and then enrolling in an English class, through advice or signposting. For example, if you include your mobile number when booking an assessment, we may call you regarding your assessment and to offer additional support and advice.

Where we get personal information from

- Directly from you

How long we keep information

HubL securely retains user data for a period of three years to ensure the support provision language assessments and class enrolment.

Who we share information with

- **Data processors:**
 - **Website server hosting & database storage** – Hosting of website and assessment booking system, including a database of user bookings, English assessments, assessment results, and notes relating to the user's individual English language skills. This includes users' personal details provided at the time of booking, and is secured through restricted access and multi-step login verification.
 - **Email and cloud file storage** – Management of email and file storage systems, including all internal communications and storage of company files and records. This includes users' personal details provided at the time of booking, and is secured through restricted access and multi-step login verification.
- **Others we share personal information with:**
 - **Charities and voluntary organisations** – we may share information regarding your English assessment outcome with local class providers to support and facilitate your enrolment.

Sharing information outside the UK

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Bluehost

Category of recipient: Website hosting provider

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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