



FOR THE FUTURE
**COOL BLUE
COLLEGE**

Privacy Policy

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0191 510 0414

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Privacy Policy

Cool Blue College respects your privacy.

Your privacy is important to us.

This privacy statement explains what personal data Cool Blue College collects from you, through our interactions with you and how we use that data.

This statement applied to Milltech interactions with you and the services listed below:

- Personal Data we collect
- How We Use Personal Data
- How to Access & control Your Personal Data

Any personal information you provide to us including and similar to your name, address, telephone number and e-mail address will not be released, sold, or rented to any entities or individuals outside of Cool Blue College.

Personal data that we collect

Cool Blue College collects data to operate effectively and provide you with services best suited to your individual needs.

You have choices about the data we collect. When you are asked to provide personal data, you may decline, but if you choose not to provide data that is necessary to deliver our services in full to you, the service delivered may be limited.

The data we collect depends on the context of the services you require to be delivered from our company, the choices you make, including protecting your privacy, and the products and services you use. The data we collect can include the following:

We collect your first name and last name, e-mail address, postal address, telephone number and other similar contact data.

How we use personal data

Cool Blue College uses the data we collect for three basic purposes:

- To operate our business
- Provide our service to you
- To send communications to you

In conducting these purposes, we collect data to give you information about our services.

Providing and improving our product

We use data to provide and improve the services we offer and to improve essential business operations. This includes delivering our services, maintaining & improving the performance of our Services and products, developing our customer service, conducting research, and providing customer support. Examples of such uses include the following:

- **Providing services** – we use data to conduct your instructions with us and to provide our services to you.
- **Client support** – We use data to provide customer care and support services.
- **Provision of services** – We use data to provide our services that have been agreed with you.
- **Service Improvement** – We use data to continually improve our services to you.
- **Business Operations** – We use data to develop, analyse and feed into business intelligence that enables us to operate, protect and make informed decisions and report on the performance of our business.
- **Communications** – We use data we collect to communicate with you.

Reasons we share personal data

We share your personal data with your consent.

We will access, transfer, disclose and preserve personal data, when we have a good faith belief that doing so is necessary to:

- Comply with applicable law or respond to valid legal processes, including from law enforcement or other government agencies.
- Protect our customers, for example to prevent spam or attempts to defraud users of our services.
- Operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks; or
- protect the rights or property of Milltech, including enforcing the terms governing the use of our services.

Credit card details

Cool Blue College will never ask for Credit Card details and request that you do not enter it on any of the forms on the College website.

External sites

Cool Blue College is not responsible for the content of external internet sites. You are advised to read the privacy policy of external sites before disclosing any personal information.

Remember the risks whenever you use the internet

While we do our best to protect your personal information, we cannot guarantee the security of any information that you transmit to Cool Blue College, and you are solely responsible for maintaining the secrecy of any passwords or other account information. In addition, other Internet sites or services that may be accessible through Cool Blue College have separate data and privacy practices independent of us, and therefore we disclaim any responsibility or liability for their policies or actions. Please contact those vendors and others directly if you have any questions about their privacy policies.

Other important privacy information

Below, you will find additional privacy information that you may find important.

European privacy rights

Cool Blue College adheres to applicable data protection laws in the European Economic Area, which if applicable includes the following rights:

If the processing of personal data is based on your consent, you have a right to withdraw consent at any time for future processing.

- You have a right to request from us, a “data controller” as defined in the law, access to and rectification of your personal data.
- You have a right to object to the processing of your personal data; and
- You have a right to lodge a complaint with a data protection authority.

When we process personal data about you, we do so with your consent and/or as necessary to provide the services/products you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of Cool Blue College as described in the “How We Use Personal Data” and “Reasons We Share Personal Data” sections above. When we transfer personal data from the European Economic Area, we do so based on a variety of legal mechanisms, as described in “Where We Store and Process Personal Data” below.

Security of personal data

Cool Blue College is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities held within two locations within the UK. When we transmit highly confidential data over the links to cloud apps into one app which your client can download.

Where we store and process personal data

Personal data collected by Cool Blue College will be held securely and we take steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable UK & EU law.

Our retention of personal data

Cool Blue College retains personal data for as long as necessary to provide the products and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. The criteria used to determine the retention periods include:

How long is the personal data needed to provide the products and operate our business? Is the personal data of a sensitive type? If so, a shortened retention time would generally be appropriate.

Has Cool Blue College adopted and announced a specific retention period for a certain data type?

Changes to this privacy statement

We will update this privacy statement when necessary to reflect customer feedback and changes in our services/products. When we post changes to this statement, we will revise the “last updated” date at the top of the statement and describe the changes. If there are material changes to the statement or in how Cool Blue College will use your personal data, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this privacy statement to learn how Cool Blue College is protecting your information.

How to contact us

If you have a privacy concern, complaint, or a question for the Data Controller of Cool Blue College, please contact us at info@coolbluecollege.com

Monitoring and review

All received complaints will be reviewed on a quarterly basis by Cool Blue College. As part of the Quality Review Meetings, the number of complaints logged and any observable trends will be discussed in detail and an appropriate plan of action to rectify the situation will be created.

Review of Policy Statement

This procedure will be reviewed at minimum, on an annual basis or when necessary, by the Managing Director of Cool Blue College and the Quality & Compliance Coordinator

Date of Review	Print Name	Position
9 th January 2023	Mark Clelland	Director
	Luke Stavers	Quality & Compliance



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