



# Privacy Notice

## 1. Introduction

System People Ltd is committed to protecting your privacy and ensuring your personal data is handled in a fair, transparent, and lawful manner.

This notice explains how and why we use your personal data, who we share it with, how we protect it, and your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice also applies to personal data collected through our websites ([www.sptraininguk.com](http://www.sptraininguk.com) and [www.system-people.co.uk](http://www.system-people.co.uk)), including enquiry forms, course applications, and other online interactions.

System People Ltd operates an “opt-in” approach for marketing communications. You have full control over how we contact you and can update your preferences or withdraw consent at any time by contacting [info@sptraininguk.com](mailto:info@sptraininguk.com).

We never sell your personal data. We only share it with trusted organisations when necessary to deliver our services or meet legal obligations, and only where privacy and security are guaranteed.

### Questions?

Any questions about this notice or how we use your data can be sent to:

The Managing Director (Data Protection Officer)  
System People Ltd, Carlisle Airport Business Park, Carlisle, CA6 4NW  
Email: [info@sptraininguk.com](mailto:info@sptraininguk.com) | Tel: 01228 530132

## 2. About Us

Your personal data will be collected and used by:

System People Ltd trading as SP Training and System People  
Company number: 04593467 (England)  
Registered address: Carlisle Airport Business Park, Carlisle, CA6 4NW  
Data Controller Registration: Z1862361

The Managing Director acts as the organisation’s Data Protection Officer (DPO). For the purposes of data protection law, System People Ltd is the data controller.

## 3. What Information We Collect

We collect and process a range of personal data depending on your relationship with us.

### Data you provide directly:

- Personal details: name, date of birth, contact details, ethnicity, National Insurance number, driving licence, residency status, and qualification level

- Financial information: payment details (credit/debit card, bank, or direct debit information)
- Employment details and existing qualifications
- Website or email enquiries: name, email, telephone number, company name (if applicable), and any other information included in your message, solely to respond to your enquiry

**Data created through your involvement with us:**

- Records of training, attendance, qualifications achieved, and assessment outcomes
- Communications and correspondence with us

**Data from third parties:**

- Department for Education (DfE) and its agencies (including legacy ESFA data)
- Awarding organisations, employers, or funding partners
- Limited information from social media (if you engage with our pages)

**Sensitive personal data:**

We may process information about health, ethnicity, or other characteristics/information (e.g., National Insurance, qualifications) where required for funding, safeguarding, or equality monitoring purposes.

**Accidents or incidents:**

If an accident or incident occurs on our premises or during training, we record details to comply with health and safety obligations.

**3A. Recruitment Services**

System People provides recruitment and work-finding services to clients and work-seekers. To deliver these services, we process personal data, including sensitive personal data, and act as a **data controller**.

**Sources of Recruitment Data:**

- Direct applications or registration forms
- Job boards or third-party recruitment platforms
- Government sources (e.g., HMRC)
- References, occupational health providers, or criminal records agencies (e.g., DBS)

**Categories of Data Collected:****A. Work-Seeker Information (for matching to roles):**

- Name, address, email, telephone number
- CV, work history, qualifications, education/training certificates
- Job preferences (role, location, salary)

- Any additional work-related information provided

**B. Additional Information (for placements and administration):**

- Passport, permits, visas (if applicable)
- Date of birth, National Insurance number
- Job offers, placement records, employment history
- Criminal record check outcomes
- Medical information (where relevant)
- References from previous employers
- Financial information (payroll, HMRC data, pensions, statutory payments)
- Communications with System People

**Purpose of Processing:**

- Matching skills and experience to suitable vacancies
- Submitting candidate details to prospective employers
- Facilitating job placements and contractual arrangements
- Administering payroll and statutory requirements
- Keeping candidates informed of relevant opportunities and services

**Legal Basis for Processing:**

- **Consent** – where explicitly provided
- **Legitimate interests** – matching candidates to roles and managing placements
- **Contractual obligations** – to perform agreements for placements
- **Legal obligations** – statutory duties such as right-to-work checks and payroll

**Data Sharing:**

We may share your personal data with:

- Clients and prospective employers for placement purposes
- Umbrella companies and payroll providers
- IT service providers (e.g., CRM systems like Voyager Software)
- Marketing and operational service providers (e.g., Sopro for digital marketing)

**Retention:**

- Work-seeker records: minimum one year from creation or last service provided (per Conduct of Employment Agencies and Employment Businesses Regulations 2003)
- Payroll, pensions, and statutory records: as required by HMRC and other applicable legislation

- Consent-based processing continues until withdrawal

**Your Rights:**

You have the same rights under UK GDPR as outlined in Section 10, including access, correction, erasure, restriction, objection, data portability, and withdrawal of consent.

**Consequences of Not Providing Data:**

Failure to provide necessary information may prevent System People from:

- Representing you for work
- Processing payroll or contractual obligations

**4. How We Use Your Information**

We only use your personal data where we have a lawful basis to do so. These include:

- **Performance of a contract:** to provide our training services and fulfil our obligations to you
- **Legal obligation:** to meet our duties under UK law and DfE funding or audit requirements
- **Legitimate interests:** to manage our business, communicate with clients, and improve our services
- **Consent:** where you have explicitly agreed (e.g., for marketing or optional communications)
- **Vital interests:** where processing is necessary to protect someone's life or wellbeing

**Examples of Use:**

- Administering enrolments, attendance, assessments, and certifications
- Managing learner and employer relationships
- Responding to enquiries submitted through our website or by email
- Providing information about training and processing course bookings
- Complying with DfE funding rules and audit requirements
- Ensuring the safety, security, and integrity of our learners and staff
- Maintaining training records and producing reports

*Recruitment services personal data is used in accordance with Section 3A.*

We do not carry out automated decision-making or profiling using your personal data.

**5. Sharing Your Data**

We only share your personal data where necessary and subject to strict confidentiality controls.

We may share data with:

- Department for Education (DfE) and its agencies for funded training and compliance
- Awarding organisations for qualification certification
- Employers/Subcontractors involved in apprenticeship or workforce training
- IT, web hosting, and analytics providers who help us operate our secure systems and website
- Auditors, inspectors, and regulators (including Ofsted and DfE auditors)
- Recruitment clients, payroll providers, and selected service providers as detailed in Section 3A Recruitment Services

All third parties are required to handle your data securely and in compliance with UK data protection law. We will never sell your personal data.

## **6. Marketing**

We will only send you marketing communications if you have opted in. You can opt out or update your preferences at any time by emailing [info@sptraininguk.com](mailto:info@sptraininguk.com).

## **7. Anonymised and Statistical Data**

We may aggregate and anonymise personal data to identify trends, measure performance, or report outcomes. This information cannot identify individuals and is not considered personal data.

## **8. How We Protect Your Data**

We use appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or disclosure.

- Data is stored on secure UK-based systems with restricted access (both physical and electronic)
- Staff receive regular data protection training and follow formal procedures for handling personal data
- Physical premises and IT systems are subject to security controls

Some of our premises have CCTV, which may record you when you visit. CCTV helps provide security and protect both visitors and staff. Footage is retained temporarily unless flagged for review (e.g., to investigate an incident).

## 9. Data Storage and Retention

We store data within the UK or in countries with UK government adequacy decisions. Where international transfers occur (e.g., through Microsoft services), we ensure appropriate safeguards such as the UK–US Data Bridge or Standard Contractual Clauses.

We only retain data as long as necessary for the purpose collected:

- Learner and funding data: typically 6–12 years in line with DfE and audit requirements
- Financial records: 6 years for accounting compliance
- CCTV: normally 30 days, unless retained for investigation
- Website enquiry data: retained only as long as necessary to respond to your query
- Recruitment records: see Section 3A for retention periods

We securely delete or anonymise data once it is no longer required.

## 10. Your Rights and Complaints

Under UK GDPR, you have the following rights:

- To access your personal data (subject access request)
- To have inaccurate or incomplete data corrected
- To request erasure (“right to be forgotten”)
- To restrict or object to processing in certain circumstances
- To data portability (where applicable)
- To withdraw consent at any time (without affecting prior lawful processing)

Please note that some rights are subject to legal exceptions. We will always aim to respond fully, but there may be circumstances where we cannot comply with a request.

### - **Right to Complain to Us**

If you are unhappy with how we have handled your personal data, you have the right to make a complaint to us.

We encourage you to contact us first so we can investigate and resolve your concerns as quickly as possible.

A data protection complaint may relate to concerns about how we:

- Collect or use your personal data
- Store, secure, or share your information
- Respond to your data rights requests
- Comply with data protection laws



You can submit a complaint using the following contact details:

**Managing Director - Data Protection Officer**

System People Ltd  
Carlisle Airport Business Park  
Carlisle, CA6 4NW

Email: [info@sptraininguk.com](mailto:info@sptraininguk.com)  
Telephone: 01228 530132

When you make a complaint, we will acknowledge your complaint within 30 days and investigate your concerns fairly and impartially. We may contact you for further information if required. Where appropriate, we will explain the outcome and any actions we have taken.

**- Escalating Your Complaint**

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO).

We ask that you allow us the opportunity to address your concerns before contacting the ICO.

**Information Commissioner's Office (ICO)**

Website: [www.ico.org.uk](http://www.ico.org.uk)  
Telephone: 0303 123 1113

## **11. Cookies, Analytics, and Website Links**

Our website uses cookies to improve user experience and analyse traffic.

Our website also uses Clicky Analytics to understand how visitors use the site. Clicky collects anonymous usage data (e.g., pages visited, visit duration, referral source). This data does not identify you personally. You can view Clicky's Privacy Policy here: <https://clicky.com/terms/privacy>.

Our site may include links to external websites. We are not responsible for their content or privacy practices. Please review the privacy notice of any external site you visit.

## **12. Updates to This Notice**

We may update this notice periodically to reflect changes in our operations or legal obligations. The latest version will always be available on our website.

**Summary:**

System People Ltd only collects the information necessary to deliver our services and respond to enquiries. We never sell or misuse personal data and take every reasonable step to keep it secure. Recruitment services data is processed in line with Section 3A.

Last reviewed: June 2026