

Privacy and Cookies Policy

Effective Date: November 2025

Last Updated: November 2025

2WARDS LIMITED ("2WARDS LIMITED", "we", "us", "our") is committed to protecting your privacy. This policy outlines how we collect, use, disclose, and protect your information across our operations and services, including our website, training programmes, consultancy services, and employee management.

1. Scope of This Policy

This policy applies to:

- Visitors to our website
- Clients and learners who use our training or consultancy services
- Employees, job applicants, and contractors

It applies to all data processed by 2WARDS LIMITED in the UK and internationally and is compliant with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

2. Personal Data We Collect

We may collect and process the following types of personal data:

A. Website Visitors

- IP address
- Browser type and version
- Pages visited and time spent
- Cookie identifiers
- Contact form details (name, email, phone)

B. Clients and Learners

- Full name, date of birth, and contact details
- Proof of ID and address (for course registration)
- Payment details (handled securely via third-party processors)
- Enrolment and progress records
- Assessment submissions and certificates
- Learning preferences, attendance, and communications

C. Employees and Applicants

- Full name, contact information, and identification
- CVs, application forms, references
- Payroll information (e.g., bank details, National Insurance number)
- Training records and employment history

- Performance reviews and disciplinary records

3. How We Use Personal Data

We use personal data to:

- Provide training and consultancy services
- Register learners with awarding bodies
- Issue certificates and verify qualifications
- Manage learner support, communication, and progress tracking
- Improve and monitor website performance
- Process employment applications and HR functions
- Comply with legal and regulatory obligations

4. Lawful Bases for Processing

We process your data under the following lawful bases:

- **Contractual necessity:** To deliver agreed training or consultancy services
- **Legal obligation:** Compliance with awarding bodies, tax, and employment laws
- **Legitimate interests:** Improve service delivery and protect our business
- **Consent:** For marketing communications or optional cookies

5. Data Sharing

We may share your data with:

- Awarding Organisations (e.g., for certification and moderation)
- Payment processors (e.g., Stripe, PayPal)
- External quality assurers (as required by Ofqual)
- HMRC or legal authorities (where required by law)
- HR/payroll service providers (for employees)

We never sell your data to third parties.

6. International Transfers

If your data is processed outside the UK (e.g., cloud storage or international learners), we ensure safeguards are in place, such as:

- Adequacy decisions
- Standard contractual clauses (SCCs)
- Secure encrypted data transfer

7. Data Retention

We retain personal data only as long as necessary:

- Learner records: 3 years from course completion
- Employee records: 6 years post-employment

- Website enquiries: 12 months unless further contact is made
- Certificate records: Retained in line with awarding body requirements

8. Your Data Rights

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion (where legally possible)
- Object to or restrict certain processing
- Withdraw consent at any time
- Lodge a complaint with the **ICO** (www.ico.org.uk)

To exercise these rights, contact us at:

Email: alexandra@2wards.co

Phone: +44 20 8952 8721

9. Cookies Policy

What Are Cookies?

Cookies are small text files stored on your device to improve your browsing experience.

Cookies We Use:

- **Essential cookies:** Necessary for site functionality
- **Analytics cookies:** Track website usage via tools like Google Analytics
- **Marketing cookies:** (Only if consented) for targeted advertising

Managing Cookies:

You can manage or disable cookies through your browser settings. Note that disabling cookies may affect website functionality.

10. Security Measures

We use appropriate security measures, including encryption, secure servers, password protection, and access control, to protect your data from unauthorised access, loss, or misuse.

11. Updates to This Policy

We may update this policy to reflect changes in law or service. The latest version will always be published on our website.

12. Contact Us

Data Controller: 2WARDS LIMITED

Email: alexandra@2wards.co

Phone: 02089528721

Website: <https://2wards.co>

Registered Office: 251-253 Burnt Oak Broadway, Edgware, England, HA8 5ED

