

## **CTC Privacy and Cookie Code of Practice (CoP)**

This Privacy and Cookie Policy explains how CTC uses the personal information we collect and how you can limit our use of that personal data.

### **1. What information do we gather?**

1.1 We gather information that relates to, and can identify you (e.g., your name and address) and information that does not identify you (e.g., a visitor's behaviour patterns when they visit our website). We collect information that does not identify you to evaluate our site, ensure that our site and services run properly and ensure we are paid for advertising services we offer. We might also collect your IP address through the placement of cookies (see sections 6 and 7 on cookies and their management, below).

### **2. How do we gather information?**

2.1 Information is gathered in two ways:

(1) indirectly (e.g., using website technology or technology when you use a CTC application for a mobile device); and

(2) directly (e.g., when you register in person or online, download a mobile device application or you otherwise provide your information when you interact with us).

### **3. How do you decide how you want to hear from us?**

3.1 We always explain why and how we might contact you at the point you give your information to us. We also provide the means for you to grant or withhold your permission for us to contact you. We do this by using opt-out tick boxes. If the boxes aren't there, it's because we will not use your information for any other purpose than that for which you give it (e.g., to administer an admission).

### **4. How we use your information**

4.1 We might use your information to:

(1) remember you when you visit our website and track your browsing patterns by using cookies. You can prevent this; section 5 deals with this in more detail;

(2) place your anonymised information into our data base to help us understand our enquiry to admissions customer relationship audience;

(3) ensure any course offers or services you receive are correctly administered (including visa applications when relevant);

(4) contact you by email, mail, telephone or sms text message to let you know about any of our courses, or services (which, in some cases may be provided by third parties such as universities) but only according to the permissions you give us;

(5) ensure materials on the website or in apps are presented in the most effective manner for you and your computer or mobile device;

- (6) collate and log numeric internet addresses to improve the website and to monitor website usage;
- (7) assess and understand customer feedback and identify usage hotspots

## **5. Accessing and updating your personal information**

5.1 Subject Access Rights (SARs): Individuals have a right to access any personal data relating to them which are held by the College. Any individual wishing to exercise this right should apply in writing to the Principal. Any member of staff receiving a SAR should forward this to the Principal. Under the terms of the legislation, any such requests must be replied to within one month.

5.2 You can update your details and preferences by emailing [info@ctc.ac.uk](mailto:info@ctc.ac.uk) or by writing to us at CTC, Water Tower Hill, Croydon, CR0 5SX, Surrey.

5.3 You have the right to access the personal information held about you. To obtain a copy of the personal information we hold about you, please send an email to [info@ctc.ac.uk](mailto:info@ctc.ac.uk). In situation where requests become excessive there will be an administrative charge of £20 for providing a copy of this information.

## **6. Cookies**

6.1 A cookie is a small piece of information that is placed on your computer when you visit certain websites. Find out more about the use of cookies on <http://www.cookiecentral.com>.

6.2 We use the following types of cookie:

(1) Analytics cookies that anonymously remember your computer or mobile device when you visit our website. They keep track of browsing patterns and build up a profile of how our visitors use the CTC website.

(2) Service cookies that help us to make our website work as efficiently as possible; remember your registration and login details; remember your settings preferences; and meter the number of pages you view for the purpose of content management.

6.3 We have no access to third party cookies and third-party organisations have no access to ours. The third-party organisations that place cookies have their own strict privacy policies.

## **7. Managing your cookies preferences**

7.1 Most browsers allow you to turn off cookies. To do this look at the “help” menu on your browser. Switching off cookies may restrict your use of the website and/or delay or affect the way in which it operates.

## **8. Security**

8.1 The password you provide when registering is encrypted to ensure protection against unauthorised access to your personal information.

8.2 We invest in high-quality security and do our utmost to protect user privacy. No data transmission over the Internet can be entirely secure, and therefore we cannot guarantee the security of your personal information and/or use of the website. Any information that you send is at your own risk and may be read by others. However, once we have received your personal information, we use strict procedures to protect the security of your personal information.

8.3 Use of computers by all members of the CTC community should follow good practice. All users should lock their screen when going away from their desk (press windows button + L). All users should change their password at least once a term. The use of computers for communicating and accessing websites must follow all related college policies.

## **9. Disclosing your information**

9.1 We may disclose your personal information if required to do so by law or in good-faith believing such action is necessary to comply with the law.

9.2 We sometimes share your personal information with third parties such as universities during the UCAS process or for visa applications or reference writing etc.

9.3 We never sell personal information, or pass it to third parties for marketing purposes without your permission.

## **10. Where we store your personal information**

10.1 The personal information that we collect from you may be sent and stored outside the European Economic Area ("EEA") as part of our support for your application to CTC or to university.

## **11. Changes to this Code of Practice (CoP)**

11.1 If we change our Policy, we will update the policy on the CTC website. Please check the website regularly for any changes to this Policy.

11.2 If we change our CoP, we will update the CoP on the CTC website. Please check the website regularly for any changes to this CoP.

## **12. If you don't feel we're adhering to this code of Practice, what should you do?**

12.1 If you believe that we have not adhered to this Policy, please notify us by email at [info@ctc.ac.uk](mailto:info@ctc.ac.uk) and we will try to solve the problem promptly.

Reviewed: August 2022

Next review: August 2023