



LEARNER PRIVACY NOTICE

OVERVIEW

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and how to contact us and the Information Commissioner's Office (ICO) in the event you have a complaint.

The Lighting Industry Association will always process your personal data in accordance with the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

Our offices are based at:

The Lighting Industry Association Limited
Stafford Park 7
Telford
TF3 3BQ

We are registered as a data controller with the ICO under the registration number ZA547621.

TYPES OF PERSONAL DATA

We process the following personal data about prospective, current, and past learners:

- Identifiers – including name, job title, geographical location
- Contact details – including work address, telephone number and email address
- Academic attainment – including prior qualifications, examination and assessment results, details of current study including progress and attendance information
- Employer details – if your employer is paying for your course fees
- Learning support requirements
- Financial details – including bank details, fee receipts, outstanding debts
- Images, audio, and video recordings
- Records of your correspondence with The LIA and/or its Learning Management System provider
- Records of your attendance, including any accessibility and/or dietary requirements, at any learning events hosted by The LIA as part of your development record

We may process other factual information, expression of opinion or other recorded information that identifies or relates to you and your studies.



SPECIAL CATEGORY DATA AND CRIMINAL CONVICTIONS

Some of your data is more sensitive than other data. This is called special category data under the UK GDPR.

Examples of special category data includes information that reveals the following:

- Racial or ethnic origin
- Political opinions
- Religion
- Philosophical beliefs
- Trade union membership
- Sexual orientation
- Health
- The processing of genetic and/or biometric data

We have no intention of collecting any special category data in relation to your learning and development journey.

HOW WE OBTAIN PERSONAL DATA

Most of your personal data that is processed by The Lighting Industry Association is provided directly by you for one of more of the following reasons:

- You have subscribed to marketing communications from us
- You have submitted an enquiry or complaint to us
- You have booked onto one of our courses

We may also receive your personal data indirectly from your employer, if they chose to register you under their membership agreement with the Association.

Our Learning Management System is provided by an approved third party, D2L, their privacy notices are available [here](#) and [here](#).

WHY WE PROCESS YOUR PERSONAL DATA

We process your personal data for the following purposes:

- To send you marketing information that may be of interest to you for your personal and professional development
- To respond to your enquiries and register you for course events pertaining to your learning experience
- To deliver your chosen course and monitor your progress
- To personalise our support to meet your learning needs
- To provide access to our online learning content and knowledge centre



Data protection requires us to have a lawful basis to process your personal data and the lawful bases that we rely on, include:

- Consent – when you send an enquiry or subscribe to receive marketing information from us
- Contract – when you enrol onto your chosen course, you and/or your employer enter into a contractual agreement to participate in and complete all elements of the learning journey
- Legitimate Interest – we may process your personal data if it is necessary for our legitimate interests, and you would reasonably expect us to hold and use this data
- Vital Interest – we may be required to share your learning progress with your employer, if they have funded the course on your behalf

WHEN WILL WE SHARE PERSONAL DATA

We may share your information with third parties who provide services to us, or directly to you on our behalf. These organisations are known as data processors. We have contracts in place with our data processors that mean they should not do anything with your personal data unless we have instructed them to do it. They will not share your personal data with any organisation apart from us without our consent, and they will ensure it is stored securely for the time period we instruct.

As mentioned in point 5, if your course fees are part or fully paid by your employer, we may share information relating to your attendance and progress upon request.

At no time will your personal data be sold to other organisations for marketing or sales purposes.

The Lighting Industry Association hold annual awards ceremonies based on performance and achievement of certain courses. If you are nominated to attend, you should be aware such events are regarded as public events and may be recorded and/or live streamed. Learner names, programmes and classifications are also printed on materials that are made publicly available, however, your consent for inclusion in these publications will be requested prior to their release.

TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

We do not routinely transfer your personal data outside of the EEA, however, on rare occasions, some organisations that process data on our behalf may store data in cloud services outside of the EEA. These transfers will only be made to services hosted in countries with which there are appropriate safeguards.

DATA RETENTION

We retain personal data for a specified period of time before destroying it confidentially, for LIA employees, further details relating to this can be found in our Data Retention Policy. If you are a learner who has accessed our services through The LIA Knowledge Hub, the following additional retention requirements will apply to your personal information:



Type of Document	Period of Retention	Reason / Requirement	Responsible Person(s)
Records containing individual feedback on the learning and development programmes in relation to continuous improvement processes	Completion of analysis of feedback, after which the data will be anonymised unless written consent obtained from the parties involved to be named on current and future marketing, PR, and communication projects	Review for archival value. Impact assessment on the quality and depth of learning received	Commercial & Training Manager
Records documenting the process of obtaining approval and/or accreditation for taught programmes from professional, statutory, or other accreditation bodies	Life of programme, plus 1-year	Review for archival value.	Commercial & Training Manager
Records containing data on, and analyses of, delegate numbers and other programme statistics	Current year, plus 5-years	Review for archival value.	Commercial & Training Manager
Working papers documenting the planning and conduct of course events	Current year, plus 1-year	Review for archival value.	Commercial & Training Manager
Records used for the purpose of analysing nomination for 'Learner of the Year' awards aligned to the Annual General Meeting and Lunch event held by The LIA	Life of the programme, plus 1-year	Review for archival value.	Commercial & Training Manager

YOUR RIGHTS

At any time, you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information, and where we go the information. In most cases, you may be entitled to copies of the information we hold concerning you. Once we have received your request, we will respond within one calendar month, unless we need to extend that period owing to the complexity of your request.

If the data we hold about you is out of date, incomplete, or incorrect, you can inform us, and we will ensure that it is updated.



If you feel that we should no longer be using your data, or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

In certain circumstances, you have the right to request The LIA stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If the data is no longer processed, we may continue to hold your data to comply with your other rights. You have the right to request that we transfer your data to another organisation or to receive a copy of your data in a common format. Once we have received your request, we will comply where it is feasible to do so.

All communication with you, including in relation to updates to this privacy notice, will be made via the preferred method of communication that you have registered with us, and you will be able to select the type of correspondence you receive. If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency or method of these communications, you can unsubscribe or notify us of your decision at any time.

In instances where we need your consent to process your information, we will ask you to make a positive indication e.g. to tick a box or insert your contact details on the relevant form or web page. This activity may also have been completed by your employer on your behalf. By actively providing us with your consent, you are stating that you have been informed of the type of personal information that will be processed, the reasons for such processing, how it will be used for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy notice.

Where processing is based on consent, you have the right to withdraw consent at any time, and you can request this by speaking to a member of staff, or contacting our Data Protection Officer, at the contact details below.

COMPLAINTS TO THE INFORMATION COMMISSIONER'S OFFICE

Should you be dissatisfied with The LIA's processing of your personal data, you have the right to complain to the Information Commissioner's Office. For more information, please see the Information Commissioner's website: <https://ico.org.uk/>

DATA PROTECTION OFFICER

If you would like to exercise any of the rights above, have any questions that you feel have not been covered by this Privacy Notice, or if you have concerns or a complaint in relation to The LIA processing your personal data, please contact us at:

dpo@thelia.org.uk

or in writing to:

The Lighting Industry Association Limited, Stafford Park 7, Telford, TF3 3BQ

Copies of this privacy notice in alternative formats are available upon request.

Sub-Processors List

In the delivery of our Services, D2L and its affiliates may engage and use data processors to assist in providing D2L Services who may have access to and/or process Client Data ("Sub-Processors").

This page provides information regarding each of these Sub-Processors, including a description of the Sub-Processor services, the type of data made available for processing, and the location of data processing. Terms used on this page, but not defined, have the meaning as set forth in the applicable written agreement between your organization and D2L (the "Agreement").

Note that typical types of User Data include:

- First name
- Last name
- Learner records (e.g. courses, grades)
- Location data
- Student unique identifier
- Email address
- Title/position
- Employer/institution
- ID data
- Log-in information
- Connection Data

Cloud Providers

Sub-Processor	Processing Location	Product	Purpose
Amazon Web Services, Inc.	Customer Location Dependent (United States, Canada, Australia, Republic of Ireland, Singapore, India)	All D2L Products	Cloud Hosting

Support Providers

Sub-Processor	Processing Location	Product	Purpose
D2L Subsidiaries: <ul style="list-style-type: none">• D2L Inc.• D2L Corporation• D2L Ltd• D2L Australia Pty Ltd• D2L Europe Ltd• D2L Asia Pte Ltd• D2L India Pvt Ltd• D2L Brasil Soluções de Tecnologia para Educação Ltda.• D2L Sistemas de Aprendizaje Innovadores• D2 R.L de C.V• H5P Group AS• D2L EU B.V.	Customer Location Dependent (United States, Canada, Mexico, Australia, Republic of Ireland, Singapore, India)	D2L may use any of its subsidiaries to process customer data and may be acting as sub-processors to deliver the Services to customers.	Support and Professional Services

Five9	Canada	Global Support	Customer Support
Forethought Technologies Inc	United States	Global Support	Customer Support
Language IO Inc	Canada	Global Support	Customer Support
Microsoft Azure IDP	Canada	Global Support	SSO for Brightspace Community & connected tools
SupportNinja	Canada	End User Support	Customer Support
The Results Companies, LLC dba Results CX	Canada, United States, Mexico	Global Support	Customer Support
Vanilla Forums ULC	Canada	Brightspace Community	Community Forums

Development Support Providers

Sub-Processor	Processing Location	Product	Purpose
EPAM Systems, Inc, EPAM Systems Canada, Ltd.	United States, India, European Union	All D2L Products	Software Development and Ancillary Services

Platform Applications

Sub-Processor	Processing Location	Product	Purpose
Google Analytics	United States	Mobile Applications	Product Analytics
Hound Technology, Inc. (DBA Honeycomb)	United States	All D2L Products	Insights & Performance Monitoring
BrightIdea	United States, European Union	Product Idea Exchange (PIE)	Product Feedback

Optional Third-Party Applications

Sub-Processor	Processing Location	Product	Purpose
Anthology Ally (Blackboard, Inc.)	United States	Anthology Ally	Course Content Accessibility
Association Analytics	United States	Association Analytics	Learning Analytics
Atomic Jolt, LLC	United States, Australia, Ireland	Atomic Search & Atomic Assessments	Text Searching and Content Authoring
ClassEDU, Inc (AKA Class Technologies)	United States, Canada, United Kingdom, Germany, Japan, Singapore, Australia, New Zealand	Class for Higher Education, K12, and Corporate (Zoom and Teams)	Third-Party Training and Learning Integration for Conferencing

Copyleaks Technologies Ltd.	United States, Europe	Copyleaks -Plagiarism Detector, and AI Content Detection	Plagiarism Detection
Credly, Inc.	United States, Europe	Credly	Digital Credential Management
Domo, Inc.	Customer Location Dependent (United States, Republic of Ireland)	Performance Plus / P+	Client Reporting
FeedbackFruits BV	United States, Canada, Australia, Europe	FeedbackFruits - Social Annotations, FeedbackFruits - Team Based Learning and Polling, FeedbackFruits - Peer Feedback, Team-Based Learning & Polling, and FeedbackFruits - Tool Suite	Pedagogy Tools
Fishtail Technologies	Customer Location Dependent (United States, Canada, Mexico, Australia, Republic of Ireland, Singapore, India)	Fishtail's "Empower"	SIS Integration
Genius SIS, Inc.	Canada, United States	Genius Extended Administration Solution	Workflow Management
Go1	United States, Australia, European Union	GO1 Content, Go1 Premium Subscription	Training & Development
Integrity Advocate Inc.	Customer Location Dependent (Canada, United Kingdom, European Union)	Integrity Advocate Proctoring - Participation Monitoring, Exam Proctoring, Exam Proctoring Plus, Live Proctoring, and Expose AI	Plagiarism Detection & Proctoring
Janison Solutions Pty Ltd	Australia, Singapore, United Kingdom, Europe	Janison Insights	Proctoring & Assessments
K-16	Customer Location Dependent	K-16: Scaffold Migration and Scaffold Archiving	Course Migration & Archiving
OpenSesame, Inc.	United States, Europe Jillian: Available globally, but hosting is only USA (AWS West).	OpenSesame Subscription - OpenSesame Plus 25, OpenSesame Plus 100,	eLearning Marketplace

		OpenSesame Plus Complete	
Ouriginal AB (Urkund)	Customer Location Dependent (United States, Sweden)	Urkund	Plagiarism Detection
ReadSpeaker	United States	ReadSpeaker WebReader/DocReader, TextAid and Custom Voice	Accessibility Tools
Respondus, Inc	United States	Respondus LockDown Browser	Browser Lockdown
Seesaw Learning, Inc	United States, United Kingdom, Australia	Seesaw - Seesaw Instruction + Insights, Early Literacy, and English Language Development (ELD)	Early & Primary Learning Platform
ShuffleLabs, LLC	Customer Location Dependent (Canada, United States, Australia, Republic of Ireland, European Union, Singapore)	Brightspace Course Connector for Microsoft Teams	Application Integration
The Global Grid 4 Learning (GG4L)	Canada, United States	GG4L Rostering Services and Grade Passback	Data Exchange Platform
Turnitin, LLC	United States	Remote Proctoring	Plagiarism Detection & Proctoring
Unity Technologies SF	Canada, European Union, United States	Unity (Virtual Reality)	VR/3D Content Tools
Workato, Inc.	United States, Australia, Europe	D2L Link	Integration and Automation
YouSeeU, Inc. (DBA Bongo)	Customer Location Dependent (Canada, United States, South America, Europe, Australia)	Video Assignments, Virtual Classroom, and AI Coach	Video Assessment & Virtual Classroom
YuJa, Inc.	Canada, United States, Europe, Australia, Singapore	YuJa - Panorama and Verity	Content Accessibility & Proctoring
Zoom Video Communications, Inc.	United States	Zoom Licenses	Web Conferencing

Optional Third-Party Professional Services

Sub-Processor	Processing Location	Product	Purpose
ANSR Source Content US LLC, ANSR Source India Private Limited	United States, India	Brightspace	Course Content Development