IP50 Privacy Policy for Delegates, Staff and Tutors

Introduction

Real Group Ltd (which trades as Real Group, Real Training, Real Psychology, Real e-Learning, Real Press, Dyslexia Action Training, The Dyslexia Guild and Dyslexia Action Shop) is committed to protecting and respecting your privacy. This policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

The website http://www.realgroup.co.uk/ is owned and operated by Real Group.

This policy covers all delegates who have registered on a training course offered by, or in partnership with, Real Group, as well as all staff and tutors working for, or in partnership with, Real Group. Anyone not covered by this policy is instead covered by **IP51 Privacy Policy for All Other Contacts**.

Information we may collect from you

We may collect personal information from you in the following ways:

- When you make a phone call or send an email to seek information about our services;
- Recruitment and employment;
- When you have purchased any of our products through our online shop;
- You have used our services of any type;
- Through our use of the Cookies on our website (please see the Cookies section below);
- Through your request for publications and other marketing materials;
- Through your request for information about our services and related topics and events;
- Through your registration for events;
- Through your contacting us with enquiries and comments;
- Through registration for courses run by us or any of our partner institutions;
- Through course enrolment;
- If your colleague has passed your details to us and
- If you or your child had been subject to assessment by one of our delegates, who we ask to provide us with copies of relevant consent forms which may include your information.

The following personal data may be processed for the legitimate interests of Real Group or a third party:

- Name
- Addresses
- Phone numbers
- E-mail addresses
- Place of work
- Teacher reference number, or other professional registration identification numbers
- Social media account details
- IP addresses and other similar electronic identifiers

The following personal data may be processed by Real Group to fulfil a contract with you, or to take steps before entering into a contract:

- Name
- Addresses
- Phone numbers
- E-mail addresses
- Place of work
- Date of birth
- Gender identity
- Sex
- Marital status
- Ethnicity
- Nationality
- Disability details
- Sexual orientation
- Religion or belief details
- Pregnancy, maternity, paternity, or adoption details
- Criminal records information
- Teacher reference number, or other professional registration identification numbers
- Copies of photo ID and passports
- Copies of immigration documents
- Copies of marriage, divorce and name change certificates
- Copies of qualification certificates and transcripts
- Employment history and copies of CVs
- National Insurance Number
- Copies of P45/P46/P60 forms
- Marital status
- Education and training records
- Employment, character and professional references
- Medical and disability details, potentially including copies of medical documents
- Next of kin details
- Bank account and other payment-related details
- Circumstantial evidence and details volunteered to Real Group to support processes such as those relating to mitigating circumstances
- Social media account details
- Parental or guardian details
- IP addresses and other similar electronic identifiers

- Psychometric test results
- Unique identifiers assigned by Real Group, or our partners

The exact details collected will depend on your relationship with Real Group. For delegates the data processed by Real Group can differ between different courses based on the requirements of the regulators and partners involved.

If you do not provide us with permission to process your data we may be unable to provide you with the service or training you are requesting or are taking part in.

Please note that sometimes information is collected from publicly available sources, such as school websites, and stored on our database and processed by us.

Where we store your personal data

The vast majority of data that we collect from you may be transferred to, and stored at, servers in the UK. Some personal data may be transferred to, processed, or stored by services or servers based outside of the UK in compliance with the UK GDPR and relevant adequacy regulations.

Uses made of the information

We will process any of your personal data, in accordance with our obligations under applicable data protection laws and regulations, for the following reasons: to provide you with the services you have requested; to comply with applicable laws and regulations; for administrative purposes; to assess enquiries; and to provide you with information about us and our services.

If, at any time, you do not wish to receive further information about us and our services use the unsubscribe links or contact us at dataprotection@realgroup.co.uk.

Uses of Artificial Intelligence (AI) and Machine Learning (ML)

The delivery of our services includes the use of artificial intelligence and machine learning tools and techniques. These tools and techniques allow us to provide a range of services within our learning platforms and websites that enhance the experience for users. Further details of how Real Group uses artificial intelligence and machine learning can be found in the **Artificial Intelligence and Machine Learning Policy**.

We use various tools to help analyse sentiment and engagement within the delivery of our training courses. For example, one tool helps us enhance the user experience and improve product development by gauging emotional tone and levels of engagement. This helps us identify areas for improvement, address user concerns, and better understand the overall satisfaction of our learning platform. Further details of how Real Group uses sentiment and engagement analysis can be found in the **Sentiment and Engagement Analysis Policy**.

We provide as transparent an explanation as possible about our AI and ML practices, including the algorithms and processes employed, and when it is possible to opt out of having your data processed, in the two policies mentioned above.

Use of Psychometric Assessments

Psychometric assessments are used as part of the recruitment process for new staff and the profiles generated from these are available to selection panels for use when making decisions about candidates.

How long we keep your information

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation).

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Disclosure of your information

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements; or to protect the rights, property, or safety of Real Group, or others. This includes exchanging information with other organisations for the purposes of safeguarding or other statutory regulations we have to comply with.

Sharing your information

There are times when we have to report to our partners and regulators or other relevant bodies and in those circumstances, we will report your information either aggregately or anonymously; or in an identifiable format if required.

We may share your information according to operational and business needs with relevant third parties with legitimate justifications. If you register on a course run by Real Group which is validated or accredited by and/or in partnership with another institution or organisation, such as Middlesex University or any of our other partners; your data will be shared with that institution for operational and quality assurance purposes. Some practice-based courses may also require support from a colleague you have nominated and an amount of course information may be shared for this purpose. What data may be shared with third parties, will vary from course to course and will be made clear during the registration period.

Where your course fees are paid by your employer, or other third party, we will share information about your progress and engagement on that course with that third party. Sensitive personal data and information about other courses studied with Real Group will not be shared with these third parties without your consent.

If you need further information in this regard, please contact our Data Manager on dataprotection@realgroup.co.uk and we will assist you further.

Your Rights

The Regulation sets out the following rights applicable to data subjects:

a) The right to be informed;

b) The right of access;

c) The right to rectification;

d) The right to erasure (also known as the 'right to be forgotten');

e) The right to restrict processing;

f) The right to data portability;

g) The right to object;

h) Rights with respect to automated decision-making and profiling.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. Some information we collect for marketing purposes is available in the public domain, such as on school websites. You can exercise your right to prevent processing for Marketing purposes by checking certain boxes on the forms we

use to collect your data or informing our team during phone calls. You can also exercise the right at any time by clicking on unsubscribe links in communications or contacting us at dataprotection@realgroup.co.uk.

Modifying or removing your information

You have the right to withdraw any consent given with respect to our use of your personal data. Furthermore, you have the right to request the modification or deletion of your personal data in the event it is incorrect or processed without your consent.

Where it is not possible to delete all of your personal data, the retained data will be securely archived with restricted access and other appropriate safeguards for as long as it is required to be retained.

To modify your personal data, or to completely opt-out of Real Group using your personal data, please contact us via dataprotection@realgroup.co.uk

Accessing your data

In line with your 'Right to Access' your personal information, you can always request to see a copy of the personal information we hold on you by contacting us via dataprotection@realgroup.co.uk
Once we confirm your identity, we will supply you with a copy of the requested personal information that we hold on you within 30 days.

Cookies

Real Group's website uses cookies to record visits to the website. This helps us to improve the website and provide you with a good experience when you browse the website.
Please see our **Cookies Policy** for more information.

Changes to Real Group's Privacy Policy

This privacy policy was last updated on 1st August 2025. Real Group reserves the right to vary this privacy policy from time to time. Such variations become effective on posting on this website. Your subsequent use of this website or submission of personal information will be deemed to signify your acceptance to the variations. If these changes affect how your personal data is processed, Real Group will take reasonable steps to let you know.

Contact

Questions, comments and requests regarding this privacy policy should be addressed to our Data Manager via dataprotection@realgroup.co.uk

We hope that you will not ever need to, but if you do want to make an informal complaint about our use of personal data, please send an email with the details of your complaint to dataprotection@realgroup.co.uk and addressed to our Data Protection Officer Tom Ziemski. We will look into and respond to any complaints we receive. If you wish to make a formal complaint please see the process outlined in Real Group's **Customer Complaints Handling Process**.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website https://ico.org.uk/concerns

Related Documents

IP16 Customer Complaints Handling Process

IP46 Data Protection Policy

IP52 Artificial Intelligence and Machine Learning Policy

IP53 Sentiment and Engagement Analysis Policy

IP55 Cookies and Electronic Tracking Policy

RG04 Data Subject Access Request Procedure

RG32 Freedom of Information Act Procedure

Document history

Issue 1

Initial release

Issue 3

Updated name of Data Manager

Issue 4

Added to standardised document template and integrated into IMS.

Updated to include a section on the use of artificial intelligence and machine learning, including details of new related policies.

Clarified sections on sharing, retention and deletion of data to bring in line with Terms and Conditions and Retention Schedule.

Issue 5

Added section on the use of psychometric assessments.

Revised “Information we may collect from you” section to add additional clarity.

Issue 6

Removed stand-alone short section on IP addresses as these are listed elsewhere in the policy.

Revised wording of AI & ML section from ‘starting to use’ to ‘using’ in relation to AI & ML tools within Real Group services.