



Bud Systems Ltd

External Privacy Notice

Last Updated: October 2024

1. Who we are and what we do

Who we are

We are Bud Systems Ltd (“Bud”, “us”, “we”, “our”). We are a limited company registered in England and Wales under registration number 10455960 and we have our registered office at 40 Berkeley Square, Bud Systems Limited, Bristol, BS8 1HP. We are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”), in relation to our processing of Personal Data under registration number ZA420103.

What we do

Bud provides a holistic solution (The Bud Platform) designed to bring together all aspects of apprenticeship and skills training management. From initial enrolment to final assessment, Bud provides a seamless, integrated experience for trainers, learners and administrators alike. We are committed to protecting the privacy and security of the Personal Data we process about you.

2. Purpose of this privacy notice and Bud’s regulatory role

The purpose of this privacy notice is to provide information to users of the Bud Platform regarding the use of personal data. Bud is primarily a Data Processor for the personal data that is processed within the platform. This means we are acting under instruction from a Data Controller. The Data Controller is the organisation which asked you to use the platform, i.e. a Training Provider or Employer. The Data Controller is ultimately responsible for providing information regarding the use of your personal data and this notice is intended to provide additional clarity.

For more information regarding other activities, undertaken outside of the Bud Platform, for which Bud is a Data Controller please see the [Bud Website Privacy Notice](#).

This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

4. What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.



5. Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data we collect see the explanations in sections 9 and 10 below.

6. How we collect your Personal Data

We collect the personal data either when you provide it via the Bud Platform or when it is provided to us by your training provider or employer (i.e. to create your account).

7. Sharing your Personal Data

We may share your Personal Data with our carefully selected third party processors and partners, including:

- Cloud Service Providers.
- Other SaaS providers (e.g. billing or payment providers).

The third parties involved in the processing of platform user data are:

- Microsoft - Cloud hosting provider (Azure)
- Supabase - Cloud hosting provider
- Gov LRS - UK Government Learning Record Service
- Brevo - Email notifications
- Loqate - Postcode / Address lookups
- Cognassist - Assessment partner (when enabled by the Training Provider)
- BKSB - Assessment partner (when enabled by the Training Provider)

We share data with these third parties only where it is necessary to provide the service. We may also share data with other third parties where the disclosure is necessary for compliance with a legal obligation or in order to protect the vital interests of an individual.

8. International Transfers

All data processed directly by Bud is located in the UK. The hosting facilities for our platform and all associated backups are situated in the UK.

Some of our processors/subprocessors (as described above), process elements of your personal data in the EU.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation).



9. Bud as a Data Controller (Purposes, lawful bases and retention periods)

When you sign up to the Bud Platform, we ask you whether you would like Bud to contact you regarding our products and services. This is the only processing activity in the Bud Platform for which Bud is the Data Controller. If you choose to receive these communications from us then we will process your name and contact details. When we do so our lawful basis for processing is 'Consent' and we will retain your details for no longer than 2 years from the last meaningful contact.

10. Bud as a Data Processor

When you sign up to and use the Bud Platform you and the Data Controller (e.g. your Training Provider or Employer) provide various types of personal data. Bud processes this data only for the purposes of fulfilling the contract we hold with the Data Controller (providing the Bud Platform service). Your Training Provider or Employer determines the lawful bases for processing this data as well as the retention periods.

This data includes your Name, Address, Telephone Number, Email Address, Profile Pictures, Gender, Date of Birth, Educational Details, Employment Details, Learning Support Details (which may include health information), Exam or Assessment submissions, and the content of Communications that you send to us.

If you require more information regarding the above data or if you would like to exercise your rights, please contact the Data Controller directly.

Bud Assist (Bud Artificial Intelligence Services)

Whilst operating the Bud Platform, we may process your information for use with Bud Artificial Intelligence services (Bud Assist). Bud uses Azure OpenAI services to process your data and provide recommendations and guidance to users. Your data is not shared with other customers, and it not used to train OpenAI models. More details on the [data, privacy and security of Azure Open AI services is available in Microsoft's policy](#).

Bud Artificial Intelligence services (Bud Assist) may make recommendations and/or offer suggestions to Platform users (e.g. Training Providers when reviewing learners assessment submissions). Bud ensures these recommendations/suggestions must be reviewed by a human Provider user prior to application.

11. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a "Subject Access Request")



You have the right to receive a copy of the Personal Data we hold about you.

- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.
- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**
You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

How to exercise your rights



Bud can help you exercise your rights only where we are the Data Controller. For all activities for which Bud is a Data Processor, you should contact the Data Controller (e.g. your Training Provider or Employer) if you wish to exercise your rights.

If you wish to exercise your rights where Bud acts as a Controller, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

12. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

By Post: 40 Berkeley Square, Bristol, BS8 1HP

By Email: dpo@bud.co.uk

We have also appointed a Data protection Officer ("DPO"). Our DPO is [Evalian](#) and can be contacted using the details above (please mark correspondence 'FAO DPO').

13. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 27th November 2024.