



Bud Systems Ltd

External Privacy Notice

Last Updated: August 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, Bristol, England, 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.

Controller

This Notice applies to activities we undertake as a Data Controller (where we decide what Personal Data to collect and how to process it). We have a separate Notice covering the use of the Bud Platform (where we primarily act as a Data Processor), that is available on bud.co.uk/legal.

You can also find information about how we use cookies within our [Cookies Notice](#).

2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. 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.

3. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You purchase goods or services from us
3. You enquire about our products and/or services
4. You receive newsletters and/or other promotional communications from us



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.

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 table below in the section entitled 'Purposes, lawful bases and retention periods'.

6. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists
- others to whom you have provided consent
- publicly available sources such as social media platforms

7. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Business Customers	Name, job title, work address, work email address, work phone number, the company you work for	To fulfil your order and manage our working relationship	Contract	6 years following the date of the last transaction
Business Associates	Name, job title, work email address, work address, work phone number, the company you work for	To handle enquiries, and/or send you newsletters and other promotional material	Legitimate interests	2 years following last meaningful contact

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.



8. Sharing your Personal Data

We may share your Personal Data with our carefully selected third parties, including:

- Digital Marketing Service Providers used to conduct marketing activity on our behalf.
- Cloud Service Providers.
- Other SaaS providers (e.g. billing or payment providers).
- Professional advisors (e.g. for maintaining insurance coverage or defending legal claims).

9. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

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), or
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf \(ico.org.uk\)](#)).

10. 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

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.

If you wish to exercise your rights, 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.



11. 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’).

12. 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 28/08/2024

Where available, you can find previous versions of this notice here bud.co.uk/legal.