



CIDORI

Igniting careers,
Transforming workplaces.



Privacy Policy



Privacy Notice

Cidori (Gateway Managed Services Ltd)

Last updated: April 2026

1. Who we are

Cidori (a trading name of Gateway Managed Services Ltd) is a provider of managed learning and development services, operating in the field of funded and commercial training programmes.

For the purposes of data protection law, we are the data controller of your personal data.

Contact details:

Gateway Managed Services Ltd

The Pinnacle, Building A

150–170 Midsummer Boulevard

Milton Keynes, MK9 1FD

Email: dataprotection@cidori.co.uk

2. What this notice covers

This privacy notice explains:

- What personal data we collect
- How and why we use it
- Who we share it with
- How long we keep it
- Your rights

We are committed to processing personal data lawfully, fairly, and transparently, in line with the UK GDPR, Data Protection Act 2018, and evolving requirements under the Data (Use and Access) Act 2025.

3. The personal data we collect

We collect personal data directly from you and, where appropriate, from third parties such as employers, training partners, and publicly available sources.

Personal data may include:

- Name and contact details (email, phone number, address)
- Job title and employment information
- Education and training history
- Assessment results, attendance, and progress data
- Employment outcomes and career progression
- Communication records

Special category data (where required) may include:

- Health information
- Ethnicity and equality monitoring data
- Religious or philosophical beliefs
- Sexual orientation
- Criminal convictions (where required for course entry)

We only collect this data where it is necessary and lawful to do so.

4. How we use your personal data

We use your personal data for the following purposes:

- Delivering training programmes and learning services
- Managing enrolment, attendance, and assessment
- Supporting employment opportunities
- Communicating with you about your training or opportunities
- Meeting legal and regulatory obligations
- Improving our services and developing new programmes

Where possible, we use aggregated or anonymised data for service improvement.

Should Cidori use learner data to develop new educational technologies or long-term career outcome studies, this falls under "Scientific Research", which supports innovation – the DUAA Act expanded the definition of "Scientific Research" to include commercial research and development.

5. Our lawful bases for processing

We rely on the following lawful bases:

Purpose	Legal Basis
Delivering training and services	Contract
Compliance with funding and regulatory requirements	Legal obligation
Service delivery and improvement	Legitimate interests*
Marketing communications	Consent

Where we rely on legitimate interests*, we ensure our processing is balanced against your rights.

Where we rely on consent, you can withdraw it at any time.

*DUAA Act introduced a specific list of "Recognised Legitimate Interests" where there is no longer a need to perform a balancing test (LIA) - for specific "recognised" purposes, the balancing test is pre-determined by law.

6. Special category data

Where we process special category data, we do so in accordance with Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018.

This may include:

- Explicit consent
- Employment and social protection obligations
- Substantial public interest (e.g. equality monitoring)

We maintain an Appropriate Policy Document which sets out how we safeguard this data.

7. How we share your data

We only share your personal data where necessary and lawful.

We may share data with:

- Funding and regulatory bodies (e.g. Department for Education, ESFA, Ofsted)
- Training and delivery partners
- Employers and recruitment partners (where relevant to employment opportunities)
- Service providers (e.g. IT systems, CRM, learning platforms) acting as processors
- Professional advisers and auditors

All third parties are required to respect the security of your data and process it in accordance with the law.

8. International data transfers

Some of our service providers may process personal data outside the UK.

Where this occurs, we ensure appropriate safeguards are in place, such as:

- UK adequacy regulations, or
- International Data Transfer Agreements (IDTAs)
- Transfers are made where the destination meets the UK "Data Protection Test"

These safeguards ensure your data is protected to UK standards.

9. How long we keep your data

We only retain personal data for as long as necessary.

Typical retention periods include:

- Learner records: in line with funding and regulatory requirements
- Marketing data: until consent is withdrawn or after a defined period of inactivity
- Employee data: in line with legal and business requirements

We maintain a detailed retention schedule and securely delete or anonymise data when no longer required.

10. Cookies and website data

When you use our website, we may collect technical information such as:

- IP address
- Browser type
- Pages visited

We use cookies to:

- Improve website functionality
- Analyse usage
- Support user experience

You can manage your preferences through our cookie banner.

Further details are available in our Cookie Policy.

11. Automated decision-making (ADM)

We do not currently make decisions about you based solely on automated processing. Any decisions involving your personal data include human involvement.

However, since ADM is permitted for non-sensitive data provided safeguards are in place, should ADM be used in the future we will always:

- Inform individuals when ADM is used
- Provide a clear route to request **human** intervention
- Allow individuals to contest the decision and make representations

12. Keeping your data secure

We take appropriate technical and organisational measures to protect your personal data, including:

- Access controls
- Secure systems and encryption
- Staff training and policies

While we take all reasonable steps, transmission over the internet cannot be guaranteed to be fully secure.

13. Your rights

You have the following rights under data protection law:

- Access – request a copy of your data
- Correction – request inaccurate data is corrected
- Erasure – request deletion where appropriate
- Restriction – request limits on processing
- Objection – object to processing based on legitimate interests
- Data portability – request transfer of your data
- Withdraw consent – where processing is based on consent

To exercise your rights, contact us at:

dataprotection@cidori.co.uk

14. Complaints

If you are not satisfied with how we handle your data, you have the right to complain to the: Information Commissioner's Office (ICO)

www.ico.org.uk

From June 2026 a statutory right will exist to complain directly to the controller as a mandatory first step before the ICO will intervene. This should be sent to:

dataprotection@cidori.co.uk

From this point we will acknowledge complaints within 30 days and respond without undue delay.

15. Changes to this notice

We may update this privacy notice from time to time.

We will notify you of significant changes where appropriate and publish the latest version on our website.

16. Contact

If you have any questions about this privacy notice or how we use your data, please contact:

Data Protection Officer

dataprotection@cidori.co.uk