

USA PRIVACY STATEMENT

This privacy statement applies to residents of the USA.

1. Summary

- For the purposes of this privacy statement, 'personal data' or 'personal information' is information, about a living person who can be identified from that data or from that data and other information to which we may have access to. This could include for example, a name, address, details of the school where a teacher works, or a candidate's exam performance video.
- **Trinity College London**¹ and/or, where relevant (see section 3 below), its subsidiaries (together, '**Trinity**', '**us**', '**our**' or '**we**') is committed to protecting the privacy and security of your personal information. Trinity is a data controller in respect of any personal information we collect from or about you. This means that we determine the purposes and means of using such personal information and that we are responsible for processing such information in compliance with privacy laws.
- This privacy statement applies to those who use our products and services or interact with us in other ways. That includes candidates who take Trinity exams and, where relevant, their parents/ guardians, individuals who book and submit exams on behalf of others, students who access Trinity educational platforms and, where relevant, their parents/ guardians, teachers and personnel who use our products and services, teachers listed on our Trinity Teacher Directory and those who visit our websites. Where we refer to "you" or "your" we are referring to one or more of these categories of individuals, depending on the context. Further information about who this privacy statement applies to is set out in section 2.
- We use your personal information to enable you to use our products and services. This includes allowing you to create an account on our website, book onto one of our exams, access our educational platforms or where you are featured on our Trinity Teacher Directory. Further information about how we use your personal information is set out in section 7.
- We disclose your information to different third parties depending on what Trinity products and services you use. This includes with our online services providers such as those who allow you to submit performance videos. We also disclose your information where required to comply with the law. Further information about how we disclose your personal information is set out in section 8.
- Where we rely on your consent, you can withdraw your consent at any time. For example, where we rely on consent to use cookies which are not essential for one of our websites to work, you can withdraw consent at any time.
- You may have a number of rights in relation to your personal information which can be exercised using the contact details set out in section 3 below, depending on applicable law. In particular, you have the right to object to our processing in certain circumstances. For example, you can object to the use of your data for direct marketing or where we process

¹Trinity College London is a registered charity with registration numbers 1014792 (England and Wales) and SC049143 (Scotland) and company registration number 02683033 in England. Its registered office is at 7th Floor, 22 Upper Ground, London SE1 9PD, United Kingdom

your personal data based on the legitimate interests legal basis under applicable law (see section 11 below).

2.Introduction

This privacy statement is for you if you are:

- a candidate taking an exam with Trinity or with our validated course providers and/or validated course and assessment providers, such as Rocksteady School of Music or Simply Piano or a parent or legal guardian of an exam candidate (if applicable). This includes your involvement in any test or trial connected with Trinity's online assessment tools;
- an individual booking an exam with Trinity or submitting an exam performance video to Trinity on behalf of an exam candidate;
- an individual purchasing a paper certificate;
- a teacher, student or parent/ guardian who uses our educational platforms such as Skill Up! and NoteLab where available in the USA;
- a teacher featured on our Teacher Directory (trinitycollege.com/teacher-directory);
- an individual who interacts with us at, or participates in, an event, a prize draw, a competition or webinar;
- an individual who contacts us via a phone call, through an email or by any other means;
- the representative of a supplier or third party providing services to us or exploring with us the possibility of providing services to use or contracting with us; and/or
- a visitor to, or interact with us online through, our websites or our applications, including:
 - trinitycollege.com
 - My-trinity.trinitycollege.com
 - musicbooking.trinitycollege.co.uk
 - trinityrock.com and www.trinityrock.com/app
 - seltbooking.trinitycollege.co.uk
 - artsaward.org.uk
 - artsawardsupporter.com
 - trinitycollege.co.uk
 - arts-support.trinitycollege.co.uk
 - learning.trinitycollege.com
 - trv.trinitycollege.co.uk
 - trinityverify.trinitycollege.co.uk
 - shop.trinitycollege.com
 - trinitycollege.com/teacher-directory
 - booking.trinitycollege.com/
 - [the Skill Up! Application](#)
 - Trinity College London NoteLab
 - our service desk, Freshdeska Trinity user account; and
 - any other website, application or online account run or provided by us from time to time

(our '**Sites**' and each a '**Site**').

Access to each Site and the use of information contained in each Site is governed by the relevant Terms of Use. If you book an exam, order products or register for training, you may also be subject to specific terms and conditions for such booking, order or registration which are for the protection of both you and us, so we advise that you please take the time to read them carefully. For further information about Trinity's data protection policies and procedures, please see [Data Protection | Trinity College London](#)

3. Our role and how to contact us

Trinity College London is the main data controller in respect of any personal information we collect from and about you, except where indicated otherwise in this statement.

Trinity College London Press Limited is a data controller in respect of any personal information about you collected where you purchase a resource, sign-up for marketing updates or interact with the Trinity College London shop (at shop.trinitycollege.com) or where you sign-up to be featured on or interact with or use the Trinity Teacher Directory (at trinitycollege.com/teacher-directory).

Other subsidiaries of Trinity College London, such as **Trinity College London (Spain), S.L.U., Trinity College London (Italy) S.r.l., Trinity College London (India) Private Limited and Trinity College London (New Zealand) Limited**, act as data processors where they provide exam services to Trinity College London and act on the instructions of Trinity College London, but may also be a data controller in respect of your personal information where they carry out business development and marketing activities or organise or participate in events, training and awareness or community building activities.

Whether as a data controller or a data processor, we are committed to protecting your privacy at all times in accordance with all applicable laws and regulations governing the use or processing of personal information, including (where applicable) the European Union General Data Protection Regulation (EU) 2016/679, the United Kingdom General Data Protection Regulation and the Data Protection Act 2018.

We have appointed a Data Protection Officer ('DPO') to oversee compliance with this privacy notice. If you have any questions about this privacy statement or how we handle your personal information, or if you wish to exercise your rights or make a complaint, please contact the DPO at dpo@trinitycollege.com, Trinity College London, 7th Floor, 22 Upper Street, London SW1 9PD

You can also contact or make a complaint at any time to the ICO (<https://ico.org.uk/>) on 00 44 (0)303 123 1113, or the corresponding data protection authority in your jurisdiction.

4. When and what personal information do we collect?

(a) Information we collect when you visit our Site(s)

We use cookies and other similar technologies such as pixels (together 'cookies') to collect information about you when you use our Sites. Where required by law, we will always obtain your consent where we use cookies unless those cookies are absolutely essential for the Site(s) to operate. We do not need to obtain consent where we use cookies which are essential for our Site(s) to operate. More information about the cookies we use and the data we collect about your visits to our Sites and the purposes for which we collect it can be found in our [Cookie Policy](#). The information collected about your visits to our Site(s) by cookies is usually limited to personal information such as:

Category	Details
Device Information	Information related to the browser or device you use to access our Site(s). This includes the IP address of the device you use to access our Sites, device identifiers, the type of web browser you use, the type of device you use to access the internet and whether you reached our Site(s) using a search engine or if you clicked a link on another website.
Usage Information	Information about how you use and interact with our Site(s), communications, products and services.

(b) Information you give to us directly

We will also collect certain personal information about you when you interact with us directly. This includes:

- when you complete an online form on one of our Sites (including our online 'Contact Us' forms and/or when you subscribe to our newsletter), or a printed form which you have downloaded from the Sites or obtained by participating in a Trinity event or webinar,
- purchase our products and services,
- when you respond to a survey,
- when you register as a user on our Site(s),
- when you use the facilities provided on or via our Site(s),
- when you book one of our exams,
- where you submit exam performance videos,
- where you access our teaching platforms such as the Skill Up! App or NoteLab (either as a teacher, student, or parent/ guardian),
- where you post entries on our online forums, and
- every time you send us an email or contact us by other means.

We may collect, store and use the following information from you:

Category	Details
Identification Information	Your name, job role, employer, gender, age/ date of birth, country location, information that we require to verify your identity such as the details of your identity documentation and/or a photograph and/or copy of your passport, driving licence or other identity documentation, any special needs requests, unique candidate learning number and password or other log in details (to access our online assessment tools and Sites), profile information on our Sites and your DBS certificate. This may include the use of facial recognition biometric technology to confirm your identity.
Contact Information	Your email address, postal address and telephone number, name and contact details of parent/guardian for candidates and users of the Skill Up! application or Trinity College London NoteLab, or for candidates or users who are under 18 and/or the submitter of the candidate's entry or exam performance video where applicable.
Exam Information	Information about your application provided in a relevant application form, image, video and/or audio recordings, including of the exam you undertake, where exams are undertaken at home we also process the contents of your screen that are shared with the invigilator/proctor, any images, video and audio recordings of any chaperones that accompany exam takers and if you are doing certain exams we may collect your related portfolios and videos.
Educational Platform Information	This includes information collected when you use Skill Up! App or NoteLab such as exercises on the Skill Up! or NoteLab Applications, recordings, form, image, video or audio where applicable, or on your use of services such as exercises on the Skill Up! application; or lesson plans on NoteLab or the Diagnostics Tool on

	NoteLLab or other user generated content on our Sites. This also includes personal data put in as part of your prompts using our AI functionality, as well as personal data included as part of the AI output.
Feedback Information	This includes information relating to your exam performance and assessment and your exam results, as well as feedback provided via educational platforms.
Payment information	Details about payments made through our Site(s), by telephone or, if via an app, through the App Store or Google Play.
Marketing and Communications Preferences	Your marketing and communication preferences.
Event Information	This includes any images, videos and/or audio recordings of you taken at our events.
Social Media Information	Your social media handle or username and the country in which you are located in relation to social media prize draws or competitions.

(c) Information we obtain indirectly

Your personal information (as listed above) may also be shared with us by third parties. For instance, we may receive it from your training provider, the submitter of your entry or exam performance video, validated course provider or validated course and assessment provider, parent or guardian. We may also generate some personal information about you when performing our usual business functions that we do not collect from you directly, for example when an exam is booked on your behalf by a third party.

(d) If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. Sensitive/Special categories of information

Data protection law recognises that certain categories of personal information are sensitive and require higher levels of protection. These categories of data include information about health, biometrics used to uniquely identify someone and ethnicity.

We may collect and/or use special categories of data in connection with our qualifications and the provision of our services, for example, in order to make adjustments for any disabilities you may have. We may also collect race, nationality, or ethnicity data from you (should you choose to provide it), to ensure meaningful equal opportunity monitoring, reporting and treatment and biometric data, with your explicit consent or for reasons of substantial public interest. In certain cases we may also collect criminal record information such as in the Trinity Teacher Directory where necessary to comply with regulatory requirements and where necessary for reasons of substantial public interest.

We will only process these sensitive/special categories of data if there is a valid reason for doing so and where the applicable data protection laws allow us to do so.

6. Children's Privacy

If you are under 13, you must not use the services on our Sites or provide any personal information to us without the express consent or supervision of your parent or guardian.

Further information in relation to our collection, use, and transfer of personal information of children under 13 years of age is set out within the relevant sections of this privacy statement.

If you are the parent or guardian of a child under 13, you may request to review or have deleted the child's personal information and refuse to permit further collection or use of the child's information to the extent permitted by applicable law by contacting us/our DPO using the contact information in Section 3.

If you are under 18 years of age, we may need to verify your parent or legal guardian's consent (to the extent required by applicable law) for your use of certain services on the Sites and/or your registration for an exam.

Further information in relation to our collection, use and transfer of personal information of individuals under 18 years of age is set out within the relevant sections of this privacy statement.

7. How do we use your personal information?

Where we collect, use, store or otherwise process your personal data for a particular purpose, the law requires us to have a 'legal basis' for each of those purposes. We will only use your personal data for the purposes and legal bases set out below.

Purpose	Details of processing	Legal ground
To enable individuals to set up a user account with Trinity	Identification Information, Contact Information, Marketing and Communication Preferences	<p>It is necessary for us to process your personal data in order for us to perform our contract with you, or to take steps at your request prior to entering into a contract with you.</p> <p>When permitted under the applicable law, we also have a legitimate interest to communicate with users of our products and services to ensure that we are providing an excellent user experience.</p>
To provide you with products and services that you purchase from us	Identification Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information and Payment Information,	<p>If you have purchased products or services from us directly, it is necessary for us to process your personal data in order for us to perform our contract with you, or to take steps at your request prior to entering into a contract with you.</p> <p>When permitted under the applicable law, we also have a legitimate interest to provide our services and grow our business.</p>
To communicate with you in relation to products and services that we provide, including about registrations for exams and exam results, or where you use one of our educational platforms	Identification Information, Contact Information, Exam Information, Educational Platform Information and Feedback Information	<p>We have a legitimate interest to communicate with users of our products and services to ensure that we are providing an excellent user experience. For example, where you ask us queries relating to different</p>

		<p>types of exams, we will rely on the legitimate interest legal basis.</p> <p>On the basis of your consent, where required by applicable law.</p>
To update your learner record where relevant	Identification Information, Contact Information, Exam Information and Feedback Information	<p>We have a legitimate interest in ensuring that we provide a good service to our users.</p> <p>On the basis of your consent, where required by applicable law.</p>
To enable you to book an exam through our platform	Identification Information, Contact Information, Exam Information	<p>We have a legitimate interest in providing a service that allows you / candidates / teachers, to book an exam for the candidate to be assessed in the chosen qualification and level by digital means.</p> <p>The system facilitates your requirements whilst providing Trinity with the information to support the assessment.</p> <p>On the basis of your consent, where required by applicable law.</p>
To enable you to take an exam submitting exam responses including audio and video recordings	Identification Information, Contact Information, Exam Information, Device Information	<p>We have a legitimate interest in providing a service that allows you to take an exam and to be assessed in the chosen qualification and level including by digital means. The system facilitates your requirements whilst providing Trinity with the information to support the assessment.</p> <p>On the basis of your consent, where required by applicable law.</p>
To enable us to carry out proctoring and invigilation, both in person and remotely	Identification Information, Contact Information, Exam Information, Device Information	<p>We have a legitimate interest in ensuring our exams are carried out with integrity.</p> <p>On the basis of your consent, where required by applicable law.</p>
To provide you with digital exam certificates	Identification Information, Contact Information, Exam Information, Device Information	<p>We have a legitimate interest in processing your personal information to provide you with digital exam certificates.</p>

		On the basis of your consent, where required by applicable law.
To provide you with paper exam certificates	Identification Information, Contact Information, Exam Information, Device Information	It is necessary for us to process your personal data in order for us to perform our contract with you, or to take steps at your request prior to entering into a contract with you.
<p>To provide our educational apps such as the Skill Up! App and associated services</p> <p>Some of our Apps use AI functionality to create a personalised learning path. For example, our Skill Up! App uses generative AI to adapt to every learner's pace creating a customised learning path for each learner, focusing on building and developing listening & reading skills.</p> <p>We may use (and approved third parties may use) your input and output data (including personal data) to fine tune, train, or develop our AI functionality or models and services.</p>	<p>Identification Information Contact Information, Device Information, Usage Information</p> <p>Education Platform Information, Payment Information</p>	<p>We have a legitimate interest to provide and improve our services and grow our business.</p> <p>On the basis of your consent, where required by applicable law.</p>
To enable you to obtain a NoteLab login account	Identification Information, Contact Information	<p>We have a legitimate interest to provide our services and grow our business.</p> <p>On the basis of your consent, where required by applicable law.</p>
To provide our speaking Diagnostics Tool in NoteLab, we may use (approve third party products) your inputs and output data to find tune, train or develop our AI functionality or models and services	<p>Identification Information Education Platform Information,</p> <p>Device Information,</p> <p>Usage Information, Payment Information where applicable</p>	<p>We have a legitimate interest to provide our services and grow our business.</p> <p>On the basis of your consent where required by applicable law. Where applicable, we may require the consent of your parent or guardian.</p>
To provide our NoteLab platform	Identification Information, Contact Information, Education Platform Information, Device Information, Usage Information, Payment Information, where applicable	<p>We have a legitimate interest to provide our services and grow our business.</p> <p>On the basis of your consent, where required by applicable law.</p>

To provide our Trinity Teacher Directory which includes publicly available teacher profiles and allows students to find appropriate teachers	Identification Information, Contact Information, Device Information, Marketing and Communications Preferences	<p>We have a legitimate interest to provide information about available teachers, or on the basis of your consent, where required by applicable law.</p> <p>On the basis of your consent (where details used for marketing purposes). Where applicable, we may require the consent of your parent or guardian.</p>
For publicity and advertising of our business	Identification Information, Contact Information, Exam Information, Event information	<p>We have a legitimate interest in promoting and advertising our business, or on the basis of your consent, where required by applicable law.</p> <p>On the basis of your explicit consent (for the extraction of biometric features from photos provided at our events to store as biometric templates which then allow us to use IT tools (including AI tools) to match your image against other images of you in our events database in order to be able to tag you for our publicity and advertising purposes). Where applicable, we may require the consent of your parent or guardian.</p>
To deal with enquiries and requests and keep records incoming and outgoing communications (e.g. emails, telephone calls)	All Information	<p>It is necessary for us to process your personal data in order for us to perform our contract with you, or to take steps at your request prior to entering into a contract with you. For example, where we are dealing with enquiries or requests in relation to products and services that you have purchased directly from us.</p> <p>Where permitted under the applicable law, we have a legitimate interest to ensure that we are responding to all enquiries made to our business. For example, where we are dealing with general enquiries.</p>
To monitor malpractice, prevent fraud and misuse of service	Identification Information, Contact Information, Exam Information, Educational Platform Information,	We have a legitimate interest to ensure our products and services are used fairly, in compliance with the terms

	Feedback Information, Payment Information, Device Information, Usage Information, Event Information	and conditions and to prevent fraud and misuse of our services. On the basis of your consent, where required by applicable law.
To deal with complaints and appeals	All Information	It is necessary for us to process your personal data in order for us to perform our contract with you, or to take steps at your request prior to entering into a contract with you. For example, where we are dealing with a complaint or appeal in relation to a product or service that you have purchased from us. When permitted under the applicable law, we have a legitimate interest to ensure that all complaints and appeals are dealt with effectively. For example, where we receive a general complaint about our business.
To monitor the quality of assessments.	Identification Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information, Payment Information	We have a legitimate interest to ensure that the products and services that we provide are of a high standard. On the basis of your consent, where required by applicable law.
To test, develop, receive feedback on and improve our products and services.	Identification Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information, Payment Information, Device Information, Usage Information, Event Information	We have a legitimate interest to review and improve our products and services. On the basis of your consent, where required by applicable law.
To consider and process applications for exams centre to become a Trinity registered exam centre or a Trinity registered exam hub	Identification Information, Contact Information	We have a legitimate interest to ensure any exam centres registered under the Trinity brand are suitable. On the basis of your consent, where required by applicable law.
To enable you to register for our events	Identity Information, Contact Information	We have a legitimate interest to run events to promote our business.

		On the basis of your consent, where required by applicable law.
To provide you with access to downloadable support resources (if available on the relevant Site)	Identity Information, Contact Information	<p>It is necessary for us to process your personal data in order for us to perform our contract with you, or to take steps at your request prior to entering into a contract with you. For example, where we provide resources for a product or service that you have purchased from us.</p> <p>When permitted under the applicable law, we have a legitimate interest to provide appropriate support resources to promote our business. For example, where we provide general support resources via our Site(s).</p>
To manage registered user records	Identity Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information, Payment Information, Marketing and Communications Preferences	<p>We have a legitimate interest to monitor and manage records for our registered users.</p> <p>On the basis of your consent, where required by applicable law.</p>
To administer our online forums (when such functionality is available on our Site(s))	Feedback Information; Identification Information if applicable; Contact Information	<p>We have a legitimate interest to obtain feedback on our products and services and prospective new products from users and teachers and interested participants.</p> <p>On the basis of your consent, where required by applicable law.</p>
To respond to requests by government or law enforcement authorities, or regulatory bodies, conducting investigations	Identity Information, Contact Information, Exam Information, Payment Information, Educational Platform Information, Feedback Information, Device Information, Usage Information, Event Information, Secure English Language Test Data	<p>Where we are required to comply with a legal obligation.</p> <p>When permitted under the applicable law, we have a legitimate interest to ensure that we respond appropriately to any investigations by a regulatory body such as OFQUAL or by the Home Office in relation to SELT.</p>
To deal with legal claims or prospective legal claims (including disclosure of such personal	Identity Information, Contact Information, Exam Information, Educational Platform Information,	To comply with a legal obligation in connection with a litigation process.

information in connection with legal process or litigation)	Feedback Information, Payment Information, Device Information, Usage Information, Event Information	When permitted under the applicable law, we have a legitimate interest to ensure that we respond appropriately to any legal claims or prospective legal claims.
To enforce compliance with our terms of use and other policies	Identity Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information, Payment Information, Device Information, Usage Information, Event Information	<p>We have a legitimate interest to ensure that our terms and policies are being complied with.</p> <p>On the basis of your consent, where required by applicable law.</p>
To provide you with a personalised experience on our Site(s)	Identification Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information, Payment Information, Device Information, Usage Information as applicable	<p>We have a legitimate interest to provide users with user friendly access to our web site to our users, or on the basis of your consent, where required by applicable law.</p> <p>On the basis of your consent. Where applicable, we may require the consent of your parent or guardian.</p>
To monitor and analyse how our Sites are being used	Device Information, Usage Information	On the basis of your consent. Where applicable, we may require the consent of your parent or guardian.
To generate anonymous reports about the use of our Sites to help us to understand how our Sites are being used and how we can improve the user experience on our Sites	Device Information, Usage Information	<p>We have a legitimate interest to analyse how our Sites are being used to improve the user experience and gain insights into the user journey on our Sites.</p> <p>On the basis of your consent, where required by applicable law.</p>
To create aggregate and statistical data (which cannot be used to directly identify you). For example, aggregate data may include data that describes the general demographics, usage or other characteristics of our exam candidates. We may use this aggregate and statistical data for marketing and publicity purposes or for educational resources, training and professional support materials	Identity Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information, Device Information, Usage Information.	<p>We have a legitimate interest to understand how our products and services are being used.</p> <p>On the basis of your consent, where required by applicable law.</p>

To invite you to participate in marketing and academic surveys	Identity Information, Contact Information, Exam Information, Educational Platform Information, Feedback Information	On the basis of your consent When permitted under the applicable law, we have a legitimate interest in carrying out surveys for customer satisfaction purpose and to improve our products and services.
To run prize draws and competitions including on social media in accordance with the relevant terms for such prize draws and competitions	Identity Information, Contact Information, Social Media Information	On the basis of your consent. Where applicable, we may require the consent of your parent or guardian.
Providing you with information and news about our exams, products and programmes of events, our syllabuses, publications, competitions, webinars or conferences, including if you have requested to receive our newsletters or if you are our existing or former customer	Identity Information, Contact Information, Marketing and Communications Preferences, Device Information, Usage Information	On the basis of your consent. Where applicable, we may require the consent of your parent or guardian. If you are an existing or former customer, we may rely on a different legal basis. In those circumstances, where you have purchased a product or service from us and we want to send you marketing information about similar products and services, when permitted under the applicable law, we will do so based on the legitimate interest legal basis provided that we give you an opportunity to opt out when we collect your contact details and in each subsequent marketing communication.
<p>To carry out targeted online advertising on our Sites and third party sites and to measure the effectiveness of our advertising.</p> <p>We and our commercial partners may use cookies or similar technologies for these purposes both on our Sites and on the third party sites. Please see our Cookie Policy for more information.</p> <p>For some of the activities referred to in this section, we may be joint controllers with some of our commercial partners and the use of your personal data may also be subject to the privacy policies and practices of our commercial partners and choices that you have made on third party sites.</p>	Device Information, Usage Information	On the basis of your consent. Where applicable, we may require the consent of your parent or guardian

For instance, for activities related to the Facebook Pixel, we are a joint controller with Meta Platforms Ireland. This means that we have to provide you with this notice, but you should contact Meta Platforms if you wish to exercise your data protection rights. Further information, including how Meta Platforms enables you to exercise your data protection rights, and subsequently processes your information as independent data controller can be found in Meta's Privacy Policy.		
Similarly, for e-commerce and transactional activities conducted via our TCLP online store, we are a joint controller with Shopify International Ltd. This means that both we and Shopify may collect and process your personal data in connection with purchases, user accounts, and browsing behaviour on our TCLP store. You should also review Shopify's Privacy Policy to understand how they handle your personal data and how to exercise your data protection rights in relation to their services.	Identity Information, Device Information, Usage Information, Contact Information, Payment Information	On the basis of your consent. Where applicable, we may require the consent of your parent or guardian
To further our charitable aim to advance education for the public benefit in general.	Marketing and Communications Preferences; Feedback Information; Educational Platform Information; Exam Information	We have a legitimate interest to review and improve our products and services and activities and to improve and extend educational services. On the basis of your consent, where required by applicable law.

There are instances and when permitted under the applicable law, where we have a legitimate interest to use your data. Our legitimate interest will vary depending on what we are using your data for, and we explain above what the interest is and how it relates to the processing operations that we are carrying out. Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details set out above.

8. Disclosing your personal information

We will only disclose personal information where necessary to fulfil the purposes set out in section 7 above. We may disclose information that we collect about you with:

Personal data category	Category of recipient	Why
All categories	Companies in our group, such as our subsidiaries	To enable them to provide support services to us.

Identity Information, Contact Information, Exam Information	Schools, colleges, education centres, validated course providers and assessment centres, local authorities and any other entity that provides training courses preparing for a qualification awarded by us	Where necessary to provide them with information about your results.
Identity Information, Contact Information, Exam Information	Persons or bodies contracted by us to carry out the roles of examiner, marker, advisor, moderator, proctor, tutor, consultant, steward, representative or other similar roles	Where we have appointed such persons or bodies on our behalf in the context of our provision of qualifications and/or in the course of providing training, educational resources or other support materials to such persons or bodies.
Identity Information, Contact Information, Exam Information	Other exam candidates	Where necessary for relevant exams, such as exam candidates participating with you in the discussion component of an ESOL Skills for Life exam.
Identity Information, Contact Information, Exam Information	Online service providers such as Submittable, RM Education and Music Gurus	To provide our online assessment tools, to provide an exam performance video submission service, manage examiner marking and results delivery process, to test and process results data and to produce qualification certificates on our behalf (see further information on digital certificates below).
Identity Information, Contact Information, Marketing and Communications Preferences, Device Information	Marketing automation tool service providers	For the purpose of managing email lists and issuing communications on our behalf.
Device Information, Usage Information	Social media providers	To enable us to serve targeted advertising to you on our Sites and on third party sites.
Identity Information, Contact Information, Exam Information	Parents and/or guardians (of children under 18 years of age)	Where parents and/or guardians raise a specific request in relation to, or ask to view, your personal information, or where the terms of a service or product require parents or guardians to sign-up for a product or service in

		relation to a child under 18 years of age, or where we need to obtain consent from your parents and/or guardians (for children under 13 years of age) or where we have any concerns.
Identity Information, Contact Information, Exam Information	Academic research partners	For the monitoring, assessment and development of our products and services.
Identity Information, Contact Information, Exam Information	Any relevant universities, schools, colleges, local authorities or other such entities	To progress your applications with those organisations – for example, we may share your personal information with a university or the University and Colleges Admissions Service
Identity Information, Contact Information, Exam Information, Payment Information	Prospective buyer or seller	If we buy or sell any business or assets or if most of our assets are acquired by a third party, we will disclose your personal information to the prospective buyer or seller of such business or assets.
Identity Information, Contact Information, Exam Information, Payment Information	Auditors	For auditing purposes, for example finance audits where we employ chartered accountants.
Identity Information, Contact Information, Exam Information, Payment Information	Regulators and government and law enforcement bodies	If we are under any legal or regulatory obligation to do so (for example as required by our regulators, e.g. the Office of Qualifications and Examinations Regulation (Ofqual) or the Information Commissioner's Office).
Identity Information, Contact Information, Exam Information, Payment Information	Third parties in connection with legal proceedings (e.g. lawyers, the courts, witnesses)	In order to establish, exercise or defend our legal rights.
Identification Information, Contact Information (including email address or email address of parent or guardian if under 18), Exam Information	EdInvent, Inc, D.B.A. (' Accredible ') acting as a data processor for Trinity (or as a sub-processor for the Home Office in relation to Secure English Language Tests	To provide you with the digital certificate where we have chosen to provide you with a Trinity digital certificate available via Accredible website.

Candidate names, candidate unique learning number, date of birth, exam results, mark sheets, centre staff name, adviser, centre number, panel name	Our third-party printers, Damco Solutions Limited	For the purpose of uploading mark sheets into a csv format and returning this to Trinity to be uploaded into its database
Candidate names, candidate unique learning number, exam details, centre details and exam results, centre staff name, centre staff address, centre number.	Our paper certificate printers, Stephen Austin Limited	For the purpose of printing paper certificates
Identification Information, Contact Information, Exam Information	Our national and local representatives such as registered Trinity Representatives	To deliver information and services in relation to our exams in your locality.
Education Platform Information, Device Information, Usage Information	Large Language Model (LLM) and AI providers	To enable our AI functionality, we share your personal data with LLM/AI providers for the provision of this functionality. These providers primarily act as our data processors for these services but may with our permission, use your personal data to fine tune/train their AI models

Accredible

Accredible, referred to in the table above, may also provide the option for you to open an account with Accredible (that may have Trinity branding). Please note that where you choose to open an account with Accredible directly and provide Accredible with additional personal information in relation to this account and where you use your account with Accredible in relation to credentials other than your Trinity digital certificate (for example, where you use your account with Accredible to hold certificates issued by another organisation), another party (i.e., not the Home Office or Trinity), such as Accredible or the other organisation that issued such credentials to you, is the data controller and you should refer to their privacy statement for further information about how your personal information is collected and used. We are not responsible for the contents of such other party's privacy statement and policies.

We may disclose your personal information to other selected third-party processors. Examples include processors which provide us with product delivery, advertising and marketing activities (including digital and personalized advertising) for our products and services, IT services, email service providers, data hosting, and management or support of our Sites but only in connection with our own processing purposes, as outlined above in paragraph 7. Any such third party will be required to use any personal information they receive from us in accordance with our instructions and the applicable data protection laws.

9. Payment transactions

Credit card online payment transactions from musicbooking.trinitycollege.co.uk, <https://booking.trinitycollege.com/> and www.trinityrock.com are either handled via Paypal or Barclaycard SmartPay or 2Checkout/Verifone. We are not responsible for the contents of their privacy policies, which can be found at:

- Paypal: www.paypal.com/en/webapps/mpp/ua/privacy-full
- Barclaycard Smart Pay: www.barclaycard.co.uk/content/dam/barclaycard/documents/business/top-nav/Barclaycard-Business-commercial-payments-privacy-notice.pdf
- 2Checkout/Verifone: www.2co.com/privacy.html

Credit/debit card and bank transfer online payment transactions from secure.trinitycollege.com and secure.2checkout.com are handled via 2 Checkout/Verifone. We are not responsible for the contents of their privacy policy, which can be found at: www.2co.com/privacy.html

Credit/debit card online payment transactions from trinity.musicgurus.com are handled via Stripe. We are not responsible for the contents of their privacy policy, which can be found at:

- stripe.com/gb/privacy

Downloads and payment transactions relating to the app showcased on www.trinityrock.com/app are either handled by Apple via the App Store, or by Google via Google Play. We are not responsible for the contents of their privacy policies, which can be found respectively at www.apple.com/uk and policies.google.com/privacy.

10. International data transfers

Your personal information may be transferred, stored, and/or otherwise processed outside the country, state or province where you are located such as the UK and the European Union and other countries. Where the recipient country is a place which applicable data protection law does not recognize as providing an adequate level of protection for your personal information we will put in place appropriate transfer mechanisms as required under the relevant data protection laws and take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information

11 Specific State Provisions

Some U.S. states—**California, Colorado, Connecticut, Delaware, Florida, Iowa, Maryland, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia** (collectively, “Certain States”)—grant individuals certain rights under state privacy laws with respect to personal information we collect. If you are subject to the privacy laws of these states, this section of the Privacy Policy contains disclosures required by law and explains rights that may be available to you.

Personal Information We Collect and Disclose. In the preceding 12 months, Trinity collected and disclosed the following categories of personal information:

- Personal and online identifiers (such as first and last name, email address, government identification documentation, device information, or unique online identifiers);
- Recordkeeping information (such as physical characteristics or description; credit card number, debit card number, or any other financial information; or medical information or health information);
- Characteristics of legally protected classifications (such as race/ethnicity or gender);
- Commercial or transactions information (such as records of products or services purchased, obtained, or considered);
- Internet or other electronic network activity information (such as browsing history, search history, or interactions with a website, email, application, or advertisement);
- Biometric information (such as facial scans or fingerprints);
- Geolocation data;
- Sensory information (such as call recordings or other audio, electronic, visual, thermal, olfactory, or other similar technology);
- Professional or employment-related information;
- Education information;
- Inferences drawn from the above information about your predicted characteristics and preferences; and
- Other information about you that is linked to the personal information above.

Some of the categories of personal information listed above are considered sensitive personal information under the **California Consumer Privacy Act (“CCPA”)**—e.g., driver’s license, passport number, or other identity documentation; account log-in information; racial or ethnic

origin or citizenship status; biometric information used to identify you; health-related information. We do not use or disclose sensitive personal information for any purposes that require an opt-out opportunity under the CCPA.

We share personal information for targeted advertising purposes but do not otherwise engage in “sales” of personal information as defined by state laws. This personal information may include that of individuals we know are under 16. Where required under applicable law, we obtain consent for such sales/sharing.

Specifically, in the past 12 months, we have disclosed the following categories of personal information to third-party business partners—such as advertising networks—for advertising and marketing purposes, including targeted advertising:

- Identifiers;
- Internet or other similar network activity;
- Geolocation data (excluding any information that may be considered sensitive under applicable state laws); and
- Inferences drawn from other personal information (excluding any information that may be considered sensitive under applicable state laws).

For Florida residents: Under Florida privacy law, “sensitive data” may include personal data we collect from individuals under 18, and “sales” may include certain processing via cookies placed on our website. With regards to this information about individuals under 18 and cookies on our website, we provide you with the following notice: This website may sell your sensitive personal data.

Categories of Sources. We collect personal information from the following categories of sources:

- You;
- Your parent(s)/guardian(s) or individuals associated with a course or training;
- Our affiliates and joint venture partners;
- Our business partners;
- Our service providers; and
- Advertising companies and networks.

Our Purposes for Processing Personal Information. We use and disclose the personal information we collect for our commercial and business purposes, as further described above in Section 7 “How do we use your personal information?” of this Privacy Statement

We may use and share de-identified information to the extent permitted by applicable law. When we use de-identified information, we maintain and use the information in de-identified form and do not attempt to re-identify it, except to check whether our deidentification processes satisfy the requirements of applicable law.

Recipients of Personal Information. We disclose the categories of personal information designated above to the categories of third parties listed above in Section 8 “Disclosing your personal information” of this Privacy Statement for commercial and business purposes.

12 Your Rights.

Residents of Certain States have rights with respect to the personal information collected by Trinity. You may be able exercise the following rights regarding personal information, subject to certain exceptions and limitations:

- The **right to confirm** whether we are processing personal information about you.
- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you; the categories of sources from which we collected personal information about you; our purposes for collecting or selling personal


information about you; the categories of personal information about you that we have sold or disclosed for a business purpose; and the categories of third parties with which we have shared personal information.

- For Minnesota and Oregon residents, the **right to request a list of the specific third parties** to which we have disclosed personal information;
- Depending on your state law, the **right to receive a portable and readily usable copy** of the personal information we have collected about you, to the extent feasible.
- The **right to correct inaccuracies** in the personal information we have collected about you.
- The **right to request that we delete** the personal information we have collected about you.
- The **right to opt out** of (i) the sharing or processing of personal information for targeted advertising and (ii) the sale of personal information. Please note that if you opt out of certain practices, we may be unable to provide you with some services.
- **Choice regarding sensitive information.** You can **withdraw consent** for such processing if you previously gave it.
- The **right not to receive discriminatory treatment** for the exercise of the above privacy rights.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- By emailing us at dpo@trinitycollege.com. You can submit any of the above requests by contacting us as described in Section 3 "Our role and how to contact us".

Additionally, for individuals subject to state laws in Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, and Virginia, if you have submitted a request that we have not reasonably fulfilled, contact us at dpo@trinitycollege.com. If you are not satisfied with the response you may appeal our decision by sending an email with the subject line "Appeal legal@trinitycollege.com for the attention of Trinity's Chief Executive's Office, Chief Executive Officer.

- 13.  Marketing communications and your rights

Verification Process and Required Information: Note that we may need to request additional information from you to verify your identity or understand the scope of your request (other than certain opt-out requests). You will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, basic contact information like your name and phone number and a copy of an identification document such as a driving license, identity card or passport and utility bill.

Authorized Agent: Depending on your state law, you may also designate an authorized agent to make requests on your behalf by designating such an agent in writing or through a power of attorney. For requests other than certain opt-outs, we will require the agent to provide us with proof that you have authorized the agent to make requests on your behalf prior to accepting requests from the agent.

Except in relation to individuals who have already signed-up for an exam, event or other service or good from us or as otherwise permitted under applicable data protection laws, Trinity operates a strict 'opt-in' policy for individuals. That means that where you have already signed-up for an exam, event or other good or service from Trinity, we may send you news and information of similar exams, events, goods or services that we provide until we are informed that this communication is no longer required. We will give you an opportunity to 'opt-out' of receiving such communications at the time that we collect your personal information and every time after that when we contact you with such communications. In all other cases, where required by applicable data protection laws, we will not send you any information unless you have requested to receive email/text/social media message updates from us. We may require the consent of a parent or guardian where a child under the age of 13 years wishes to 'opt-in' to receive such updates from us.

You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by clicking on the unsubscribe link in the relevant email or message, or by emailing us at unsubscribe@trinitycollege.com. Once this information is received we will remove you from our direct marketing database.

14. Security of your data

Trinity takes its security obligations under the data protection laws seriously. We will endeavour to take all reasonable steps to protect your personal information in order to prevent unauthorised access to or alteration or destruction of personal information in our possession. All the personal information we collect is stored securely on servers and we use secure internet protocols and secure networks to protect data collection and processing.

Any payment transaction from our Sites will be encrypted. While we will use all reasonable efforts to safeguard your personal information, you acknowledge that the use of the internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any personal information that is transferred via the internet. If you have any particular concerns about your information, please contact us (see paragraph 3 above for our contact details).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

15. How long do we keep your personal information for?

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In determining the appropriate retention period for your personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. Information which is necessary to verify or confirm exam results may be kept by us indefinitely. For further details about the periods for which we retain personal information and the criteria determined for setting these periods, please see our [Data Retention Policy](#) and [Data Retention Schedule](#).

16. Changes to this privacy statement

We may update this privacy statement from time to time. When we do, we will publish the updated version on our website. If material changes are made to this privacy statement we will notify you by email (and where required by applicable data protection laws obtain your consent) or by placing a prominent notice on the website.

Document owner and approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this document is reviewed in line with the review requirements.

Effective date: 12 December 2025

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