

Confetti College – Privacy Notice – For Business Customers

Introduction

Confetti College (part of Nottingham Trent University) is committed to protecting the privacy and security of your personal information and strictly adhere to the rules laid out by the UK General Data Protection Regulation (UK GDPR), Data Protection Act of 2018 and Data Use and Access Act of 2025. This Privacy Notice provides important information about how Confetti College (CC) and its associated entities (“Confetti”, “we”, or “us”), which includes Nova Centric Ltd; and Nottingham Trent University (“NTU”), identifies and manages its Data Protection responsibilities in accordance with its legal and regulatory obligations. CC is wholly owned by NTU, and as such NTU’s Privacy Notice has been adopted, with additions to reflect local business practice.

Confetti encourage you to review the privacy statements of any websites you choose to navigate to from our website (or navigate from to our website) or digital services that we provide links to, so that you can understand how those websites collect, use and share your information as well. Any third-party sites that you can access through the website are not covered by this Privacy Notice and we accept no responsibility or liability for these sites.

Who we are

Confetti is a “data controller” which means we are responsible for deciding how we hold and use personal information about you.

This Privacy Notice applies to all Confetti Business Customers (“you” or “your”) or services that link to it (collectively, our “Services”). Occasionally, a Service will link to a different Privacy Statement that will outline the particular privacy practices of that Service (e.g.; website and cookies).

Please read this Privacy Notice carefully and contact our Data Protection Officer if you have any questions about our privacy practices or your personal information choices.

Data Protection Services to Confetti are provided by NTU’s data protection team. The Data Protection Officer can be contacted by the details below:

Attn: Data Protection Officer
Nottingham Trent University
50 Shakespeare Street
Nottingham
NG1 4FQ
Email: DPO@ntu.ac.uk

We may need to update this Privacy Notice from time to time. If changes made to this Privacy Notice are considered to be material, we will notify you of the changes. This Policy was last updated on 19 September 2025.

Personal information

Confetti is committed to the responsible handling and protection of personal information. Personal Data, or personal information, means any information about an individual from which that person (a “Data Subject”) can be identified. It does not include data where the identity has been removed (anonymous data). The information will be Personal Data if a person can be identified either directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. For example personal data may include names,

addresses, email addresses and telephone numbers; it may also include images in photographs or films and recorded telephone conversations.

Why we process your data

We collect, use, disclose, transfer, and store personal information to provide Services to you and for our operational and business purposes as described in this Privacy Notice. We want to be clear about our privacy practices so that you are fully informed and can make choices about the use of your information, and we encourage you to contact us at any time with questions or concerns.

The types of personal information we collect

We collect personal information from you, for example, if you register for an event, request information, or use any of our Services. The categories of personal information that we may collect, store and use about you include (but are not limited to)

- Name, address, telephone number, email;
- Your country of birth, nationality;
- Date of birth and gender;
- Communications relating to decision we make;
- Bank details and/or payment card details;
- Visual images / photographs (including CCTV);
- Computing and email information including login details, network access and library usage.

In some circumstances, we may also collect, store and use the following the “special categories” of more sensitive personal information which may include (but are not limited to) *racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions we have asked you to declare.*

We may process special category personal information in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations or comply with relevant legislation;
- Where it is needed in the public interest, such as for equal opportunities monitoring and reporting or to carry out Criminal Record background checks.

We will identify Article 9 exception under UK GDPR and DPA 2018’s Schedule 1 when processing special categories of data.

How we collect your data

Not all the personal information Cofetti holds about you will always come directly from you. Apart from the data that you provide to us, we may also process data about you from a range of sources, which include (but are not limited to):

- Data that we and our staff generate about you, such as notes of business interactions, emails sent;
- Through interactions you have with individual Services at Confetti;
- Through third parties;
- Through our Digital Services: which are the website and any other Confetti authorised internet services, websites, products, social media, mobile phone apps and/or software applications that enable you to use, access, view, listen to and/or download Confetti content or to interact with us online (or through any other digital means) on any device. We collect information that you provide to us by filling out forms on the website or by corresponding with us through the Digital Services. It includes information that you provide when you participate in discussion boards or other social media functions within the Digital Services, enter a competition, promotion or survey, and when you report a problem with the Digital Services;

- Email or telephone correspondence you have with Confetti or instant messaging.

If you pay or contribute to Services from Confetti, we will collect payment information, such as financial or bank card information, and other information necessary for us to process the transaction.

Our servers, logs, and other technologies automatically collect certain information to help us administer, protect, and improve our Services; analyse usage; and improve users' experience.

We receive and store certain types of information whenever you interact with us. This includes the use of "cookies". Please refer to our website policy for further information regarding our use of cookies. We may also automatically record visits to our website for the purposes of improving our services. These recordings may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Information collected by cookies or session recordings is stored and is used for aggregated and statistical reporting.

Confetti uses CCTV around its site, and will collect and store information. For full details of our CCTV use, please refer to our CCTV Policy.

Lawful Basis Of Processing Information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- You have given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.
- If the processing is necessary for the purpose of recognised legitimate interest

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

The purpose test – to identify the legitimate interest

Necessity test – to consider if the processing is necessary for the purpose identified

Balancing test – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

However, where processing is based on recognised legitimate interest, we would not conduct a balancing exercise of legitimate interest assessment

How we use data about you

We use your personal information for the following purposes:

- For the administration of our business relationship with you
- To provide you with information on products or services that you may request from us, or which we feel may be of interest to you;
- To enable all financial transactions to and from us;
- The administration of any membership cards;
- To collect payment for Services, and for the collection of debt;
- To carry out our contractual obligations with you which will include the operation and delivery of any Services you have requested, deal with requests and enquiries;

- Where it is necessary to comply with a legal obligation;
- To provide management statistics to enhance the customer experience;
- For security and safety purposes (e.g. through the use of CCTV);
- To ensure that content from our website or Services is presented in the most effective manner for you and for your computer or device by gathering aggregate information about our users, using it to analyse the effectiveness and efficiency of communications;
- Where you have agreed for the purpose of consulting, informing and gauging your opinion about our products and Services, for example, surveys;
- To ensure we meet our statutory obligations, including those related to diversity and equal opportunity;
- Photographs of our facilities, or general activity in common areas of Confetti as part of general marketing materials, for example in our reports or brochures. Personal data alongside photographs will only be used with explicit consent;
- To ensure compliance with the Prevent Duty under the Counter Terrorism & Security Act 2015;
- To notify you about changes to our Services.

Marketing Purposes

- Progressive profiling – we may use your personal information to better personalise communications to you;
- Analysing web behaviour – we may use your personal information to recognise web visitors on and off our Digital Services to improve experiences, analyse marketing activities, understand audiences, and personalise content for our Digital Services, applications and advertising;
- Targeting advertising – using data collected automatically on and off our Digital Services to target and tailor advertising and analyse marketing activities (e.g. retargeting users from our website, or using anonymous data segments created by trusted partners who may collect your data);
- Internal data matching – to enable us to merge certain types of data collected by Confetti to identify known and unknown users and map interactions with Confetti's Digital Services to CRM (Customer Relationship Management) platforms and applications, for purposes of personalising content, understanding audiences, analysing marketing performance and targeting advertising; and
- External data matching – to match customer lists with online platforms (e.g. through applications such as Facebook Custom Audiences and Google Customer Match) to target and tailor advertising, understand audiences and analyse marketing activities.

Who we share your data with

Confetti shares or discloses personal information when necessary to provide Services or conduct our business operations. When we share personal information, we do so in accordance with data privacy and security requirements. We may occasionally share non-personal, anonymised or pseudonymised, and statistical data with third parties.

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legal requirement or legitimate interest in doing so. Third parties will only process your personal data on our instructions and where they have agreed to treat that information confidentially and to keep it secure.

Below are the parties with whom we may share personal information and why;

- Within Confetti: Associated entities or services are provided data by a variety of teams and functions, and personal information will be made available to them if necessary for the provision of Services, account administration, marketing, and technical support, for instance.

- Our business partners or suppliers: We occasionally partner with other organisations to deliver co-branded content or events (e.g. conferences and seminars). As part of these arrangements, you may be a customer of both Confetti and our partners, and we and our partners may collect and share information about you. Confetti will handle personal information in accordance with this Privacy Notice, and we encourage you to review the privacy statements of our partners to learn more about how they collect, use, and share personal information.
- Our third-party service providers: We partner with and are supported by service providers both in the UK around the world. Personal information will be made available to these parties only when necessary to fulfil the services they provide to us, such as direct marketing services; advertising; data analytics. Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.
- Debt collection agencies and payment service providers.
- We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; fraud or safeguarding.
- We may also use personal information to meet our internal and external audit or governmental requirements, information security purposes, and as we otherwise believe to be necessary or appropriate.
 - (a) Under applicable law, which may include laws outside your country of residence;
 - (b) To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
 - (c) To enforce our terms and conditions; and
 - (d) To protect our rights, privacy, safety, or property, or those of other persons.

We may share information with third parties for marketing and advertising purposes. This may include such activities as activating Google Analytics Advertising Features, creating customer audiences via Facebook, Twitter, Snapchat and Google. We have implemented the following Google Analytics Features: Create Remarketing Audiences (based on specific behaviour, demographic, and interest data and we will share those lists with AdWords and use demographic and interest data in your Google Analytics reports) and Create Segments based on demographic and interest data. Please refer to NTU's Cookies Policy for further details regarding our use of cookies. You can opt-out of the Google Analytics Advertising Features that we use including through Ad Settings (including Ad Setting for mobile apps) and any other available means (for example, the Network Advertising Initiatives consumer opt-out available at <http://optout.networkadvertising.org/#/>). For further information please refer to <https://tools.google.com/dlpage/gaoptout/>.

How long we keep your data for

We will not store your personal information for longer than is necessary. Confetti will ensure that our trusted partners and selected third parties with whom we share your personal information in accordance with this Privacy Notice will delete your personal information when they no longer require it.

In determining data retention periods, Confetti takes into consideration local laws, contractual obligations, and the expectations and requirements of our data subjects. When we no longer need personal information, we securely delete or destroy it.

How we secure your data

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business requirement to know.

Confetti takes data security seriously, and we use appropriate technologies and procedures to protect personal information. For example:

- Policies and procedures – measures are in place to protect against accidental loss and unauthorised access, use, destruction, or disclosure of data.
- Business Continuity and Disaster Recovery strategies that are designed to safeguard the continuity of our service to our clients and to protect our people and assets.
- Appropriate restrictions on access to personal information.
- Monitoring and physical measures, to store and transfer data securely.
- Data Privacy Impact Assessments (DPIA) in accordance with legal requirements and our business policies.
- Periodic training on privacy, information security, and other related subjects for employees and contractors.
- Vendor risk management.
- Contracts and security reviews on third-party vendors and providers of services.

How we keep your data secure in other countries

Your personal information may be transferred by us or our trusted partners outside of the European Economic Area (the “**EEA**”). The trusted partners that may do this are organisations who process data for business purposes, marketing or analysis. Confetti collaborates with third parties such as cloud hosting services, suppliers, and technology support located around the world to serve the needs of the business.

Confetti takes appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law, and shall ensure that your personal information transferred to countries outside of the EEA/UK is adequately protected. Where personal data is transferred outside of the EEA/UK to a country without an adequacy decision, Confetti will ensure appropriate safeguards are in place prior to the transfer. These could include:

International Data Transfer Agreement

EU Standard Contractual Clauses + UK Addendum

Binding Corporate Rules

An exception as defined in Article 49 of the EU GDPR

This means your rights and protection remain with your data, i.e.: Confetti ensures that the recipients of your personal information protect it.

Your rights

We respect your right to access and control your information, and we will respond to requests for information and, where applicable, will correct, amend, or delete your personal information.

Under certain circumstances, by law you have the right to:

- **The right to be informed** : We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right
- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of personal information that we hold about you. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure** of your personal information in limited circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are processing your personal information on the basis of our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction or suspension of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - This is a conditional right which may only be exercised when:
 - Processing is unlawful
 - We no longer need the personal data, but it is required for a legal process
 - You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
 - If you are exercising your right to rectification
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- **Right to Data Portability:** You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
 - Processing is based on consent
 - Processing is by automated means (i.e. not paper based)
 - Processing is necessary for the fulfilment of a contractual obligation

How to contact us

If you are concerned about an aspect of your relationship with Confetti, you can bring your concerns to the attention of relevant staff, to enable investigation of the concerns with the aim of satisfactory resolution.

Please contact us with any requests related to your personal information, or with any questions or queries you may have about this statement. Our DPO contact is:
DPO@ntu.ac.uk

If you are not satisfied with how Confetti manages your personal data, you have the right to make a complaint to a data protection regulator. The ICO contact details are:

Post:



Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Website: [Click Here](#)

Email: [Click Here](#)

Phone: 0303 123 1113