Mixology Group Ltd & Mixology School Ltd – Privacy and Data Protection Policy (2025/26)

1. Purpose of This Policy

Mixology Group Ltd and Mixology School Ltd ("we", "us", "our") are committed to protecting the privacy and security of all personal data we collect and process. This policy outlines how we comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all relevant statutory requirements.

We ensure that all personal data is handled lawfully, transparently, and securely. This policy applies to all training delivered by Mixology Group Ltd and Mixology School Ltd, including WSET qualifications.

2. Scope

This policy applies to:

- All staff, directors, trainers, contractors, and associates
- All personal data processed in relation to learners, WSET students, clients, partners, and suppliers
- All training, consultancy, and administrative activities carried out by Mixology Group Ltd and Mixology School Ltd

3. Principles of Data Protection

We adhere to the UK GDPR principles. Personal data must be:

- Processed lawfully, fairly, and transparently
- Collected for specified, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Stored only for as long as necessary
- Processed securely, protecting against unauthorised access, loss, or damage

4. What Personal Data We Collect

Depending on the nature of the training or service, we may collect:

General Training & Consultancy

- Learner names and contact details
- Attendance records
- Assessment results (where applicable)
- Feedback forms
- Emergency contact information (for certain courses)
- Staff DBS status and relevant qualifications
- Information required by commissioning partners (e.g., Kent Adult Education)

WSET Courses (Level 1 & 2 in Spirits)

In line with WSET requirements, we may also collect:

- Full legal name
- Date of birth
- Gender (optional)
- Email address
- Reasonable Adjustment or Special Consideration documentation
- Exam results and candidate numbers
- Identification documents where required for exam integrity

We do not collect unnecessary or excessive data.

5. How We Use Personal Data

We use personal data for:

General Training

- Course administration and learner registration
- Compliance with commissioning or funding requirements
- Monitoring attendance and learner progress
- Issuing certificates or proof of training
- Quality assurance and safeguarding
- Communication regarding training sessions
- Contractual obligations with partners such as Kent Adult Education

WSET Courses

To deliver WSET qualifications, we must process and share personal data with WSET for:

- Candidate registration
- Exam booking and administration
- Reasonable Adjustment and Special Consideration applications
- Certification and results
- Compliance with WSET policies and regulatory requirements

We do **not** use personal data for marketing unless explicit consent has been given.

6. Lawful Basis for Processing

We process personal data under the following lawful bases:

- **Contractual necessity** – to deliver training services and register students for WSET exams
- **Legal obligation** – safeguarding, health & safety, and regulatory requirements
- **Public task** – where delivering training on behalf of local authorities
- **Legitimate interests** – quality assurance, service improvement, and internal record-keeping
- **Consent** – where required (e.g., optional marketing communications)

7. Data Sharing

We only share personal data when necessary and appropriate.

We may share data with:

- **WSET Awards** (awarding body) for exam registration, certification, and regulatory compliance
- **Commissioning partners** (e.g., Kent Adult Education) for reporting and funding requirements
- **Safeguarding authorities** where required by law
- **Delivery partners** where essential for course administration

WSET-specific data sharing

When enrolling on a WSET course, students are informed that their data will be shared with WSET and processed under:

- **WSET's Privacy Policy**
- **WSET's regulatory obligations (e.g., Ofqual)**

We never sell personal data or share it with third parties for marketing.

8. Data Storage & Security

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

- Secure password-protected systems
- Encrypted storage where appropriate
- Restricted access to personal data on a need-to-know basis
- Secure disposal of data when no longer required
- Secure storage and destruction of paper records

WSET-related data (e.g., exam documents) is stored and transferred in line with WSET's security requirements.

9. Data Retention

Personal data is retained only for as long as necessary:

- **Learner records:** up to 3 years, unless required longer by a commissioning body
- **WSET candidate records:** minimum 3 years (as required by the APP Handbook)
- **Certification records:** up to 5 years
- **Safeguarding records:** in line with statutory guidance
- **Financial records:** 6 years (HMRC requirement)

After this period, data is securely deleted or destroyed.

10. Rights of Individuals

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent (where consent is the lawful basis)

Requests will be responded to within one month.

11. Data Breaches

Any suspected data breach will be:

- Investigated immediately
- Reported to the Directors
- Logged and assessed for risk
- Reported to the ICO within 72 hours where required
- Communicated to affected individuals where there is a high risk to their rights or freedoms

WSET will be informed if a breach affects WSET candidate data.

12. Responsibilities

- **Directors** oversee compliance with data protection legislation
- **Zoe Cunliffe** is the Data Protection Lead and WSET Main Contact
- All staff and trainers must follow this policy and complete required training
- Mixology Group Ltd and Mixology School Ltd ensure that all partners handling data on our behalf meet GDPR standards

13. Contact for Data Protection Queries

For questions, concerns, or data access requests, please contact:

Data Protection Lead – Mixology Group Ltd / Mixology School Ltd Zoe Cunliffe, Director: **zoe@mixologygroup.co.uk**