

PRIVACY NOTICE

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This notice was last updated on Wednesday May 19th, 2021 and complies to the UK GDPR, underpinned by the UK law the Data Protection Act (2018), and regulated by the UK ICO (Information Commissioners Office).

Scope & Responsibilities

Our scope is all data subjects, whose personal data is collected, in line with the requirements of the UK GDPR.

The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to The Training Societi Ltd collecting and/or processing their personal data.

All associates and employees of The Training Societi Ltd who interact with data subjects are responsible for ensuring that this privacy notice is drawn to the data subject's attention and their consent to the processing of their personal data is secured.

Who we are?

The Training Societi Ltd was established in 2011 to roll out health and safety training to public and private sector companies in the Bristol area. The Training Societi provides the highest standards of health and safety training, ensuring contractors, employees and staff are safe in the workplace.

The Training Societi Ltd collects and processes certain personal information about you.

When we do so we are regulated under the <u>UK General Data Protection Regulation</u>, which is underpinned by the <u>Data Protection Act (2018)</u>

We are responsible as the data controller & data processor (UK GDPR Article 30) for all personal information collected for the purposes of those laws. The Data Protection Officer (DPO) is Katherine Thorne of The Training Societi Ltd, Unit 1, Riverside Business Centre, St Anne's, Bristol, BS4 4ED.

The Training Societi Ltd can be contacted via email info@trainingsocieti.co.uk

The personal information we collect and use.

Lawful bases for processing of personal data:

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever The Training Societi Ltd processes your personal data:

- **Contract** the processing is necessary for The Training Societi Ltd to fulfil the obligations of an agreement or contract for the provision of our health and safety training courses. Both parties would be provided with a signed copy of the contract and a copy of this privacy notice.
- Legitimate Interests the processing is necessary, as The Training Societi Ltd has ascertained the legitimate interest of the individual/organisation and explained why the processing of personal data is required to action the legitimate interest. The Training Societi Ltd reviews our legitimate interest to hold personal data annually via a Legitimate Interests Assessment (LIA).

• Legal Obligations - the processing is necessary for The Training Societi Ltd to meet the requirements of a UK law and/or regulatory compliance. The Training Societi Ltd will identify the source for obligation (e.g., Health & Safety at Work Act) and explain why your personal data is required to meet such obligations.

You can find more about the UK GDPR lawful bases here or by visiting www.ico.org.uk

How we use your personal information

The Training Societi Ltd uses your personal information:

- To pre-qualify which of our products & services are suitable for your requirements (e.g., suitable training courses).
- To provide and maintain our services (e.g., processing training course bookings)
- To notify you about changes to our services (e.g., direct communications through secure & trusted The Training Societi Ltd communication channels)
- To allow you to participate in any interactive features of our services when you choose to do so (e.g., online training courses via video software)
- To provide customer care and support (e.g., after sales support and refresher course bookings)
- To monitor the analysis/usage of the services (e.g., non-personal data via Google Analytics in relation to The Training Societi Ltd website)
- To produce documentation, invoices & payment processing for our services (e.g., order confirmations, course certificates and invoices)

What information we collect about you.

The personal data you have provided, we have collected from you, or we have received from third parties includes:

- contact details (e.g., contact names, email addresses, contact numbers)
- addresses (e.g., business addresses & other nominated site addresses)
- photographic ID, such as a driving licence or passport for the purposes of carrying out anti-fraud and anti-money laundering checks and verifying your identity.
- Covid-19 test results, via email or text, where requested by a certification body (e.g., CiTB, PASMA) and/or a local authority, NHS centre or national UK government.
- financial information such as invoices, payments, and receipts.
- identifiers assigned to you, your computer, or other devices, including your Internet Protocol (IP) address, which is used for fraud prevention and to improve customer experience.

Who we share your personal information with?

Where relevant, given the nature of the services provided to you by The Training Societi Ltd we may also share your personal data with the following categories of third parties:

- third party accredited certification bodies to produce training course certification (e.g., IPAF, PASMA and CITB), financial service providers (to process training course payments), and debt collection agencies (as is necessary for the performance of a contract between you and us and/or as is necessary in accordance with our legitimate interests).
- fraud prevention agencies and associations, (as is necessary for compliance with our legal obligations).
- regulators and law enforcement agencies, including the police, HM Revenue and Customs or any other relevant authority who may have jurisdiction (as is necessary for compliance with our legal obligations and/or as is necessary in accordance with our legitimate interests).

We would always inform you ahead of acting on any instructions to proceed with any of our services, should this be the case.

This data sharing enables The Training Societi Ltd to supply the above documented services to you in a professional and timely manner, whilst undertaking quality control & regulatory compliance procedures. Furthermore, it ensures compliance with all necessary UK GDPR & Data Protection Act (2018) lawful requirements.

The Training Societi Ltd will share personal information with law enforcement or other authorities if required by applicable law.

Whether information must be provided by you, and if so, why?

The provision of certain personal data including (but not limited to) contact name, registered address, email address and telephone number. This enables The Training Societi Ltd to provide our health and safety training courses to you.

We will inform you at the point of collecting information from you, whether you are required to provide this and any other additional information to us.

How long your personal information will be kept?

- We will retain your personal information for several purposes, as is necessary to allow us to carry out our business in accordance with our legitimate interests and / or as is necessary for compliance with our legal obligations.
- Any retention of personal data will be carried out in compliance with legal and regulatory obligations and
 with industry standards. These data retention periods are subject to change without further notice because
 of changes to associated laws or regulations.
- Your information will be kept for up to 7 years on our main systems, after which time it will be archived, deleted, or anonymised depending on the content of the material and whether there is any continuing need for it to be retained. For example, some of the archived information may be retained for a further period to allow us to meet legal obligations.
- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- Details of retention periods for different aspects of your personal data are available in our Document Destruction & Retention Policy which you can request from us by contacting us.
- Any personal data held in hard document copy is securely stored pre-destruction after use and is destroyed with a Certificate of Destruction in line with our UK GDPR Document Destruction & Retention Policy.

Your rights

Under the UK GDPR, Data Protection Act (2018) and ICO guidance you have several important rights free of charge. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.

- Right of portability you have the right to have the data we hold about you transferred to another
 organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the <u>Information Commissioner's Office (ICO) on individuals rights under the UK General Data Protection</u> Regulation.

If you would like to exercise any of those rights, please:

- call, email, or write to us in the first instance.
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates?

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator (e.g., ICO) of a suspected data security breach where we are legally required to do so.

If you want detailed information from, Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Cookies

We use cookies to collect, store and share bits of information about your activities when you use our website. Cookies do different things, like letting you navigate between pages quickly and generally improving your experience of a website. If a website does not use cookies, it will think you are a new visitor every time you move to a new page on the website – for example, when you enter your login details and move to another page it will not recognise you and it will not be able to keep you logged in.

The Training Societi Ltd only use non-personal data essential cookies on this website to track the performance of the website via Google Analytics. This non personal data helps us to understand how to improve the website content for the benefit of all users. If you want to block cookies, then you can do this through your browser via the help function. You can also visit www.aboutcookies.org for further guidance.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data.

The <u>UK General Data Protection Regulation</u> also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioners Office (ICO) who may be contacted <u>here</u> or by telephone on *0303 123 1113*.

Changes to this privacy notice

This privacy notice was last reviewed and published on Wednesday May 19th, 2021.

The Training Societi Ltd is a UK based company, registered in England & Wales, under company registration number 07809974.

We may change this privacy notice from time to time, when we do, we will inform you via email and/or our company website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information, we hold about you.

The Data Protection Officer (DPO) is Katherine Thorne.

If you wish to contact us, please send an email to info@trainingsocieti.co.uk or write to Katherine Thorne of The Training Societi Ltd, Unit 1, Riverside Business Centre, St Anne's, Bristol, BS4 4ED.