KENNET AND THAMES TRAINING



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GDPR Privacy Policy

Privacy Information Notice for Members, Customers, Trainees, **Instructors, Suppliers and Business Contacts**

Kennet & Thames Training needs to collect and use certain types of information about its members and other individuals who come into contact with the Training Group. This personal information must be dealt with properly however it is collected, recorded and used - whether on paper, in a computer, or recorded on other material.

Kennet & Thames Training regards the lawful and correct treatment of personal information as very important and therefore ensures that personal information is treated lawfully and correctly. To this end the Training Group fully endorses and adheres to the principles of the General Data Protection Regulations.

This notice applies to prospective, existing and former customers of Kennet & Thames Training; individual and business contacts; individuals who request information from us; any person who provides services to us, either as an individual or as the employee or representative of a corporate service provider; and third parties acting for our customers.

Kennet & Thames Training reserve the right to update this notice at any time. Should any substantial updates be made, we will notify you. We may also notify you in other ways from time to time about the processing of your personal information. Any questions regarding this Policy and our privacy practices should be sent by email to the office -

- Kennet & Thames Training is a registered Training Provider with Lantra, providing training for the rural industry.
- VAT Registration No 614 6997 08
- ICO Registration Reference Z4764524

What information is collected and how is it used -

Members/Customers details – business address, phone number, email - kept either in hard copy or on a password protected computer. Required for general correspondence & accounting purposes.

Information such as individual's dates of birth, addresses (both email and home) and phone numbers are required for certification purposes (Lantra and NPTC).

To keep in line with most other legal documents, which need to be kept for 6 years, we will do the same with this information. Either in hard copy or on computer.

During the years when we were able to access EU funding, we were informed that we had to keep personal data for 25 years, in case of any checks required by EU. All of this information is stored on hard copy in a locked container.

Training Records - This information is purely for each customer/member's benefit and only given out to the member/customer to which it refers.

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Sensitive data

Kennet & Thames Training does not currently gather sensitive personal data (e.g. health, genetic, biometric data; racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, and criminal convictions) within day to day business.

Children's information

Our training courses are not available to children under the age of 13.

Our lawful basis for using personal information

Kennet & Thames Training will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to act on the arrangements we have entered into with you
- Where it is necessary for legitimate interests, for example Accountants, Agents (Insurance), Bankers,
 Solicitors
- Where we need to comply with a legal obligation
- Otherwise, with your prior consent

We will only use your personal information for the purposes for which it was collected, as already outlined, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for any unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Third Parties

Kennet & Thames Training will not sell or rent information to third parties and will not share any information with third parties for marketing purposes. We would disclose only the personal information that is necessary to deliver any training related service. Kennet & Thames Training use a number of third party companies to assist with fulfilling training course obligations. Any third-party service providers are required to take appropriate security measures to protect your personal information in line with our policy.

Kennet & Thames Training do not allow third-party providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with the relevant training course needs.

General Data Retention

We will only retain your personal information 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.

Data Sharing

Kennet & Thames Training share personal information where required by law and in order to fulfil training requirements, with the following third parties:

- HMRC or other government or law enforcement agencies
- Insurers, bank, accountant
- Instructors, certification bodies

Where we share information with others they are responsible to you for their use of your information and compliance with the law.

Controlling information

You have rights concerning the information held under the GDPR. Should you wish to exercise these rights, please contact our office.

Requests for copies of information held

Upon request, Kennet & Thames Training will provide a statement regarding the personal data held in relation to an individual or business. Any requests should be made in writing addressed to the Kennet & Thames Training office.

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Updating or correcting information held

The accuracy of personal information held is important to us. Please keep us informed if your personal information changes during the course of our arrangements with you.

Deleting personal data

You have the right to request erasure of personal information. Unless there is a compelling reason for the data not to be erased (eg EU Funding data), personal data will be deleted upon request.

Challenging Legitimate Interests

Under certain circumstances, you have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

Restrict Processing

Under certain circumstances, you have the right to request the restriction 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.

Request a data transfer

Under certain circumstances; you have the right to request the transfer of your personal information to another party.

Withdraw Consent

Under certain circumstances, you have the right to withdraw consent in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you.

Security

Kennet & Thames Training take data security seriously. In order to protect all personal data from loss, misuse or unauthorised access or disclosure we have put in place methods to safeguard and secure information collected. These steps include:

- Data minimisation
- Password best practice
- Security best practice concerning devices (PCs, laptops, mobile devices), online accounts, website hosting, physical access and storage
- training and accountability on data protection

Data Breaches

Kennet & Thames Training Data Protection Policy includes a clear process for handling a personal data breach, should one occur. Any data breaches that are discovered externally should be reported to the office immediately. Where appropriate, we will promptly notify anyone should any unauthorised access to their personal information have taken place and ICO if relevant.

Complaints

Should anyone wish to make a complaint regarding personal information held, matters should be raised with the Kennet & Thames Training office in the first instance. Should the response not be satisfactory, or if there are suspicions that Kennet & Thames Training is not processing a person's information in accordance with the law, complaints are to be made to the Information Commissioners' Office (ICO).

This Policy is accessible via our website or Training Group Office. Policy updated – 15/10/18