

# **Hampshire Training (Phil Quill)**

## **Privacy & Data Protection Policies**

**Reviewed July 2018**

## Privacy Policy

Hampshire Training (Phil Quill) are committed to maintaining the trust and confidence of our customers to our business and website. Hampshire Training (Phil Quill) does not sell, rent or trade email lists with other companies and businesses for marketing purposes.

This Privacy Policy is designed to ensure compliance with the European General Data Protection Regulation (GDPR) and provides detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

### Types of data we collect:

#### *Booking Data*

When you book a course with Hampshire Training (Phil Quill) your name, email and address/contact number if applicable will be stored in our booking system. We never share your personal details or sensitive information or your payment details with any other company.

#### *Third Parties*

We share certain personal information with the following organisations and you can see their privacy policies below: -

ITC First  
MIAS

These Awarding Organisations typically collect the following personal data (First Name, Surname, Email, Telephone, Mobile, Address, Town, County, Postcode, Country, Date of birth and signature), which allow learners to be awarded credit associated with qualifications. They may also collect special category (sensitive data) e.g. Gender, National Identity, Ethnic Group, Special needs, which they are required to monitor and regularly report on, as they are obliged to by their external qualification regulators (Ofqual, SQA Accreditation and Qualifications Wales). The provision of the aforementioned data by learners is not mandatory. They may pass personal information securely to HM Government for statistical purposes or to law enforcement authorities for the prevention of crime or fraud. ITC also provide an email reminder service to candidates and training providers advising them that their qualification will need renewing in a few months time. ITC communicate via the email address provided during the training registration process and you can see their email reminder policy P12 within their policies below: -

<https://www.itcfirst.org.uk/policies/policies/1.htm>

### Access to your Personal Data

Under GDPR the data subject has the following rights, via which they can access and amend any of their personal data that Hampshire Training (Phil Quill) hold: -

- a) The right to be informed
- b) The right of access
- c) The right to rectification
- d) The right to erasure
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object
- h) Rights in relation to automated decision making and profiling

You are entitled to view, amend, or delete the personal information that we hold; if you wish to do so please email your request with the title "Personal Data Request" to our Director responsible for data protection at [phil.q@zen.co.uk](mailto:phil.q@zen.co.uk)

### **Questions or Concerns?**

If you have any questions or concerns about this policy or about the way in which Hampshire Training (Phil Quill) processes personal data please email the Director responsible for data protection at [phil.q@zen.co.uk](mailto:phil.q@zen.co.uk)

### **Data Protection Policy**

Hampshire Training (Phil Quill) are committed to the rules of data protection and abiding by the eight data protection principles. These are the principles that must be satisfied when obtaining, handling, processing, moving and the storage of personal data. As a first aid training centre, Hampshire Training (Phil Quill) need to collect and process information as required by the Awarding Organisation (AO) and its regulators Hampshire Training (Phil Quill) is therefore considered the Data Processor under the European General Data Protection Regulation (GDPR) and its course candidates and employees the Data Subjects.

### **The 8 Data Protection Principles**

- a) Data must be obtained and processed fairly and lawfully
- b) Data must be obtained for a specified and lawful purpose
- c) Data must be adequate, relevant and not excessive for its collection purpose
- d) Data must be accurate and kept up to date
- e) Data must not be kept for longer than is necessary for its purpose
- f) Data must be processed in accordance with the Data Subject's rights
- g) Data must be kept safe from unauthorised access, accidental loss or destruction
- h) Data must not be transferred to a country outside the European Economic Area

### **Data Subjects Rights**

- a) To know what information is held by Hampshire Training (Phil Quill) about them and why
- b) Know how to gain access to it
- c) Know how to keep it up to date
- d) Know what Hampshire Training (Phil Quill) does to ensure compliance with its legal obligations

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### **Data Collection**

Hampshire Training (Phil Quill) collect as part of the booking and registration process of qualification delivery. Hampshire Training (Phil Quill) collect and retain data as part of their Hampshire Training (Phil Quill) trainer and staff administrative tasks

### **Data Storage**

Hampshire Training (Phil Quill) will ensure that:

- a) Data is held securely such as password protected computer, locked cabinets/drawers, encrypted, computers have appropriate virus/data protection software appropriate to the business
- b) Course registrations forms (which includes, name, address, contact details, colour, race, signature) are removed from sight and access of other course candidates immediately after completion
- c) Data is not disclosed or shared orally or in writing to any unauthorised party
- d) Hampshire Training (Phil Quill) will upload course candidate data to their part of the AO website and promptly submit all documentation to the AO. Data submitted will only be viewable via individual unique User log on and password of Hampshire Training (Phil Quill) and the AO.

e) Hampshire Training (Phil Quill) will not share their log on and passwords with any unauthorised individuals or companies.

#### **Data Retention**

a) Hampshire Training (Phil Quill) will retain any data in accordance with AO retention periods currently 5 years.

b) Hampshire Training (Phil Quill) will review its necessity to retain data once it has been submitted and accepted by the AO.

#### **Data Destruction**

a) Hampshire Training (Phil Quill) will ensure it destroys data in a confidential manner ie shredding of paper documents, deletion from computer systems

b) Hampshire Training (Phil Quill) will ensure it does not retain data longer than is required for the purpose of training

#### **Subject Access**

Any party who has provided personal data to Hampshire Training (Phil Quill) have the right to request what information is stored and its content. Access request may be made in writing by letter or email to Hampshire Training (Phil Quill) who will discuss the request with the data subject. Data will be provided in accordance with the subject's Rights of Access under Data Protection Act.

#### **The rights of the individual**

Under GDPR individuals have the rights associated with their data described below: -

a) The right to be informed

b) The right of access

c) The right to rectification

d) The right to erasure

e) The right to restrict processing

f) The right to data portability

g) The right to object

h) Rights in relation to automated decision making and profiling

#### **Breaches of Data Protection**

a) Breaches or suspected breaches should be reported to Hampshire Training (Phil Quill) who will make the necessary investigations and provide a response to the informant within 3 weeks of receipt.

b) Breaches may also be raised with the AO by contacting their office either via email, telephone or in writing.

#### **Questions or Concerns?**

If you have any questions or concerns about this policy or about the way in which Hampshire Training (Phil Quill) processes personal data please email [phil.q@zen.co.uk](mailto:phil.q@zen.co.uk)

[www.hantstraining.co.uk](http://www.hantstraining.co.uk) website cookies:

## Hampshire Training PRIVACY POLICY

Hampshire Training (the “Company”) is committed to protecting the privacy of its users. This Privacy Policy (“Privacy Policy”) is designed to help you understand what information we gather, how we use it, what we do to protect it, and to assist you in making informed decisions when using our Service. Unless otherwise indicated below, this Privacy Policy applies to any website that references this Privacy Policy, any Company website, as well as any data the Company may collect across partnered and unaffiliated sites.

For purposes of this Agreement, “Service” refers to the Company’s service which can be accessed via our website at [www.hantstraining.co.uk](http://www.hantstraining.co.uk) or through our mobile application. The terms “we,” “us,” and “our” refer to the Company. “You” refers to you, as a user of Service.

### I. CONSENT

By accessing our Service, you accept our Privacy Policy and Terms of Use, and you consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. In addition, by using our Service, or services across partnered and unaffiliated sites, you are accepting the policies and practices described in this Privacy Policy. Each time you visit our website, or use the Service, and any time you voluntarily provide us with information, you agree that you are consenting to our collection, use and disclosure of the information that you provide, and you are consenting to receive emails or otherwise be contacted, as described in this Privacy Policy. Whether or not you register or create any kind of account with us, this Privacy Policy applies to all users of the website and the Service.

### II. INFORMATION WE COLLECT

We may collect both “Non-Personal Information” and “Personal Information” about you. “Non-Personal Information” includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. “Personal Information” includes information that can be used to personally identify you, such as your name, address and email address.

In addition, we may also track information provided to us by your browser or by our mobile application when you view or use the Service, such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. We use this information for, among other things, the operation of the Service, to maintain the quality of the Service, to provide general statistics regarding use of the Service and for other business purposes. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user’s browser from our servers and are stored on the user’s computer hard drive. Sending a cookie to a user’s browser enables us to collect Non-Personal Information about that user and keep a record of the user’s preferences when utilizing our services, both on an individual and aggregate basis. The Company may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them,

while session cookies expire when you close your browser. Persistent cookies can be removed by following your Internet browser help file directions. If you choose to disable cookies, some areas of the Service may not work properly.

### III. HOW WE USE AND SHARE INFORMATION

#### Personal Information:

In general, we do not sell, trade, rent or otherwise share your Personal Information with third parties without your consent. We may share your Personal Information with vendors and other third-party providers who are performing services for the Company. In general, the vendors and third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide for the Company. For example, when you provide us with personal information to complete a transaction, verify your credit card, place an order, arrange for a delivery, or return a purchase, you consent to our collecting and using such personal information for that specific purpose, including by transmitting such information to our vendors (and their service providers) performing these services for the Company.

However, certain third-party service providers, such as payment processors, have their own privacy policies in respect of the information that we are required to provide to them in order to use their services. For these third-party service providers, we recommend that you read their privacy policies so that you can understand the manner in which your Personal Information will be handled by such providers.

In addition, we may disclose your Personal Information if required to do so by law or if you violate our Terms of Use.

#### Non-Personal Information:

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns of the Service. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our sole discretion.

### IV. HOW WE PROTECT INFORMATION

We implement reasonable precautions and follow industry best practices in order to protect your Personal Information and ensure that such Personal Information is not accessed, disclosed, altered or destroyed. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such precautions. By using our Service, you acknowledge that you understand and agree to assume these risks.

### V. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user via Weebly, the user can opt out of

further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or opting out in the Settings section of the Site, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy.

## VI. WEEBLY

Our Service is hosted by Weebly, Inc. (“Weebly”). Weebly provides us with the online e-commerce platform that allows us to provide the Service to you. Your information, including Personal Information, may be stored through Weebly’s servers. By using the Service, you consent to Weebly’s collection, disclosure, storage, and use of your Personal Information in accordance with Weebly’s privacy policy available at <https://www.weebly.com/privacy>.

## VII. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## VIII. AGE OF CONSENT

By using the Service, you represent that you are at least 18 years of age.

## IX. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this Privacy Policy and our Terms of Use at any time. If we decide to change this Privacy Policy, we will post these changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. Any such modifications become effective upon your continued access to and/or use of the Service five (5) days after we first post the changes on the website or otherwise provide you with notice of such modifications. It is your sole responsibility to check this website from time to time to view any such changes to the terms of this Privacy Policy. If you do not agree to any changes, if and when such changes may be made to this Privacy Policy, you must cease access to this website. If you have provided your email address to us, you give us permission to email you for the purpose of notification as described in this Privacy Policy.

## X. MERGER OR ACQUISITION

In the event we (or Weebly) undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our (or Weebly’s) assets

may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes here so that you may opt out of the new information practices. We suggest that you check this Privacy Policy periodically if you are concerned about how your information is used.

## **XI. EMAIL COMMUNICATIONS & OPTING OUT**

We will send you Service-related announcements on occasions when it is necessary to do so. For instance, if our Service is temporarily suspended for maintenance, or a new enhancement is released, which will affect the way you use our Service, we might send you an email. Generally, you may not opt-out of these communications, which are not promotional in nature. Based upon the Personal Information that you provide us, we may communicate with you in response to your inquiries to provide the services you request and to manage your account. We will communicate with you by email or telephone, in accordance with your wishes. We may also use your Personal Information to send you updates and other promotional communications. If you no longer wish to receive those email updates, you may opt-out of receiving them by following the instructions included in each update or communication.

## **XII. CONTACT US & WITHDRAWING CONSENT**

If you have any questions regarding this Privacy Policy or the practices of this Site, or wish to withdraw your consent for the continued collection, use or disclosure of your Personal Information, please contact us by sending an email to [phil.q@zen.co.uk](mailto:phil.q@zen.co.uk).

Last Updated: This Privacy Policy was last updated on Tue Jul 17 2018.

**NEXT REVIEW DUE AS REQUIRED**