

General Data Protection Regulation (GDPR) Policy



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|--------------------------|--|
| Trustee Owner | Andrew Cobb |
| Effective date: | 1/3/22 |
| Review date: | 1/3/25 |
| Related documents | Risk Management Policy Employee Data Privacy Policy Privacy and Cookie Policy Safer Recruitment Policy Safeguarding and Prevent Policies |

Approval History

| Version | Reviewed by | Amendment History | Approved by | Date |
|---------|-----------------|-----------------------------|----------------|------------|
| 1.0 | Jane Sullivan | First draft | Chris Crewdson | 01/03/22 |
| 1.1 | Katharine Jane | Updated for charity status | Jane Sullivan | 18/7/22 |
| 1.2 | Andrew Counsell | Reviewed – no amends needed | Katharine Jane | 11/03/2024 |

Purpose

The purpose of this policy is to set out how Newton Rigg Ltd manages its data in compliance with legislation.

Scope

All staff, trustees and volunteers will be made aware of this policy when joining the organisation through the induction process. For the purpose of this policy the word employee will apply to employees and volunteers (including Trustees).

Policy Statement

For the purposes of administration and the management of the business Newton Rigg Ltd needs to retain and process personal information about its employees, volunteers, students, suppliers and other contacts. Some areas of the organisation (child care and adult health & social care in particular) have specific information handling requirements over those generally applicable.

Newton Rigg Ltd is committed to ensuring that all personal information is processed fairly, lawfully and as transparently as possible and is compliant with the General Data Protection Regulation (GDPR) effective from 17th July 2021.

This policy draws on advice issued by the Information Commissioner at <https://ico.org.uk/media/for-organisations/data-protection-reform/overview-of-the-gdpr-1-13.pdf>.

Article 5 of the GDPR requires that personal data shall be:

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Article 5 (2) requires that “the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

The GDPR provides the following rights for individuals:

1. The right of access
2. The right to rectification
3. The right to erasure
4. The right to restrict processing
5. The right to data portability
6. The right to object
7. Rights in relation to automated decision making and profiling.
8. The right to be informed

As a data controller, Newton Rigg Ltd must appoint a Data Protection Officer if it meets the following criteria

- is a public authority (except for courts acting in their judicial capacity);
- carries out large scale systematic monitoring of individuals (for example, online behaviour tracking); or

- carries out large scale processing of special categories of data or data relating to criminal convictions and offences.

None of these criteria apply. Newton Rigg Ltd does not therefore have an appointed Data Protection Officer.

Employee Data

Information is kept about employees for legal purposes (eg for payroll), for administration purposes and for the purposes of day-to-day management. The organisation will process the information in your employment record in accordance with its Employee Data Privacy Notice (see Appendix F) which may be revised and re-issued from time-to-time. A general privacy notice (see Appendix G) summarises the manner in which we handle employee data.

Student Data

Personal Information is gathered from visitors and activity participants only in so far as is essential for the administration of the services offered. Administrative data is held in paper files (eg registration, consent forms) which are kept in a locked filing cabinet in the office or electronically which is stored securely on OneDrive.

Accessing Data

Newton Rigg Ltd, upon request, will confirm what personal data they hold in relation to an employee or students. Subject to any statutory exemptions all employees and students shall be entitled to request access any personal data or sensitive personal data Newton Rigg Ltd have retained in relation to the requesting individual.

Any employee or student shall also be able to request Newton Rigg Ltd to amend or correct inaccurate information retained. An employee or student wishing to make such a request must provide details in writing to their line manager or contact point outlining the disclosure sought.

Newton Rigg Ltd will process any request without unreasonable delay and in any event within one month of Newton Rigg Ltd having receipt of the written request and any additional information which Newton Rigg Ltd reasonably requires in order to locate the information. No obligation upon Newton Rigg Ltd to provide the information arises until these conditions have been fulfilled.

Where the requesting employee or student has failed to provide sufficient information to readily identify the data sought Newton Rigg Ltd may write back requesting further details. The information will be supplied by way of a copy, except where the supply of a copy in permanent form is not possible or would involve disproportionate effort, or the employee agrees otherwise. Newton Rigg Ltd shall provide access to the information unless doing so would infringe upon the rights of any third party or any legal exemption applies.

Sharing information

Sometimes, situations may arise where it would be appropriate to break confidentiality or share information.

Circumstances which may be considered as appropriate are as follows:

- Where the information is not personal or confidential in nature;
- Where the person to whom the duty is owed has given explicit consent (e.g., through the sign-up form for services or verbally)
- Where there is an overriding public interest in disclosure;
- Where it is considered that withholding information could cause harm or injury to someone
- Where there is a legal obligation to disclose information for example
 - It is disclosed or considered that a criminal offence has been or will be committed.
 - Information disclosed relating to acts of terrorism
 - Disclosure of information relating to the protection of children or vulnerable adults.

Data Security

Physical copies of students' data are kept in a locked cabinet in Newton Rigg Ltd Office accessible only to those staff who have need. Digital data is stored on OneDrive in folders were only staff who have need have access. Our computers are protected by bitdefender security software that blocks and alerts us to intrusion attempts. Logs are regularly monitored and scans undertaken (weekly).

Student data is not taken off site in any electronic form. Should transfer of data off site be required it must be encrypted before being written to portable media.

Data incidents

When a breach of data security has been suspected, measures will be put in place immediately to prevent any further data loss. An investigation will be undertaken to determine what data may have been compromised. The methodology developed by ENISA (https://www.enisa.europa.eu/publications/dbnseverity/at_download/fullReport) should be used to determine the scale of the breach.

Where a breach is detected those people whose data has been compromised must be contacted and informed about the nature of the breach. If the breach is a major one then the ICO should be informed within 72 hours of the incident (see <https://ico.org.uk/for-organisations/report-a-breach/>).

The GDPR imposes a duty on all organisations to report certain types of data breach to the relevant supervisory authority, and in some cases to the individuals affected. A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Retention of Data

Newton Rigg Ltd will hold the minimum personal data and sensitive personal data necessary to enable it to perform its functions. The retention schedule at Appendix A sets out the length of time that different types of data will be kept. Newton Rigg Ltd will keep some items of information for longer than others. The retention period will never be for longer than is necessary and in line with current good practice and statutory requirements.

Records retained will be kept in a secure location. The erasure or destruction of information which is out of date will be conducted in such a way as to preserve the confidentiality of the information. All paper records that contain confidential information will be kept in locked cabinets and the keys will only be available to approved personnel. All confidential electronic

data will be stored in restricted locations on the server. Access to these locations will only be for approved personnel decided by the Chair of the Trustees.

Appendix A - Information retention schedule

| Type of record | Retained for: | Why retained |
|--|--|--|
| Employee information including timesheets, review meetings, PDPs | 7 years from the termination of employment | The purpose for which Newton Rigg Ltd holds any information about Employees after the end of employment is for use solely in relation to residual employment related matters including, but not limited to; the provision of job references, processing applications for re-employment, matters relating to retirement benefits the fulfilment of contractual or statutory obligations. A minimum of 6 years post termination is required as directed by Limitation Act 1980 |
| Pre-employment vetting information | 2 years post termination | As directed by Home Office, documents are added to staff personal file. As per Keeping Children Safe in Education 2022 re single central record. |
| Volunteer, Trainee Teacher and Contractor records | 6 years post termination | As per Keeping Children Safe in Education 2022, enhanced DBS may be requested if regulated activity is being undertaken or is working unsupervised. |
| Disciplinary proceedings | Oral- date + 6mths Written level 1- date +6mths Written level 2- date + 12mths Final- date + 18mths | If case not found, then details will be removed from personal file. |
| Complaints and compliments | +5 years | Records will be kept for 5 years beyond the resolution of the complaint and reviewed for further retention in cases of contentious disputes. After this period aggregated summaries that do not identify individuals will be retained, and where appropriate this will be undertaken at an earlier time if possible. |

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| Job candidate information | 6 months | The records of unsuccessful job applicants will be kept for 6 months. This allows for revisit if the recruitment is unsuccessful and also for challenge of the recruitment process. See Safer Recruitment Policy. |
| Finance records | 7 years | Statutory guidelines |
| Volunteers, students and service users | 2 years from date of last contact | This will allow for references to be provided (if applicable) and for funding reporting. |
| Volunteer applicant information | 1 year | The information about people who have applied to volunteer but have not been placed will be kept for 1 year to allow placement when possible. |
| Allegations made against staff | 10 years from date of allegation Indefinite for sexual abuse | As per Keeping Children Safe in Education 2022: Referral to DBS if person resigns or has settlement agreement. Details of malicious allegations will be cleared from records. Records kept of allegation, follow up and resolution, action taken (copy given to accused). All records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Indefinite for sexual abuse. |
| Student admissions, attendance, behaviour, exclusion | 2 years after end date | Admissions data is used extensively. Longer period of storage is recommended for appeals processes. After this period aggregated summaries that do not identify individuals will be retained. Formative assessment data is used whilst the student is enrolled at the school, but once the child leaves it has little value and is deleted or taken away by the student. Summative attainment is retained as indicated (or in accordance with awarding body requirements) to aid in trend analysis. After this period aggregated summaries that do not identify individuals will be retained. Attendance data is required in order to inform commissioners of attendance patterns. This information will be passed to the relevant onward commissioners at the time of the person leaving. Once all bills are settled, then aggregated summaries which do not identify individuals will be maintained to enable trend analysis to be undertaken. Behaviour: This is relevant to manage students whilst they are enrolled. After this period aggregated summaries that do not identify individuals will be retained. Exclusion: This is relevant to ensure data is passed to the commissioners. After this period aggregated summaries that do not identify individuals will be retained. |
| Safeguarding protection File) (Child | 5years + | All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a student's file (name, address) that are needed to identify them with certainty are needed to be retained along with those records. |

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| Health and Safety policy and risk assessments | Life of policy/ RA + 3 years | |
| Records of accidents/incidents/ RIDDOR | Date + 12 years | Extended period required to allow for longer onset of ill health post-accident. In line with Limitations Act 1980 (can action 3 years after death). Will be reviewed on case-by-case basis. |
| Health surveillance records | 40 years | As recommended by HSE. HS records kept separate to medical records. Kept for 40 years from last entry date to manage long periods between exposure and onset of ill-health. Unlikely to be needed for this business. |
| Fire precaution logbook | 6 years | |
| Insurance certificates | + 10 years after closure | |
| Asset management | 6 years | |
| Annual accounts | 6 years | |
| Invoices/debts/ loans/grants/receipts/ bank statements | 6 years | |

Appendix B – Procedure for Transferring Data

Information sent to us (e.g. risk assessments) does not identify students other than by initials. Once risk assessments and references are received (either electronically or in paper format) they are stored along with the student's application form in a locked filing cabinet in Newton Rigg Ltd office. Students are informed of this information sharing procedure on the volunteer application form.

This information is never sent out and kept in the secure location for duration of engagement and for a period of 2 years following end date (see Appendix A - Information retention schedule).

Appendix C– New services

When new services are introduced to the organisation consideration of their impact on the security of personal information must be considered.

Appendix D – Audit Requirements

The Chair of the Trustees will check annually which staff have access to personal information and will assess their level of knowledge about it correct use and protection.

Appendix E – Information Location and Access



| Information | Location | Used by |
|---|--|----------------------------------|
| Personal information supplied to us by student | Filing cabinet in the office | Tutors, admin staff and managers |
| Personal information supplied to us by student | Excel spread sheet held on OneDrive | Tutors, admin staff and managers |
| Risk assessments supplied by external companies | Filing cabinet in the office or Excel spread sheet held on OneDrive | Tutors, admin staff and managers |

Appendix F

Newton Rigg Ltd Employee Data Privacy Notice

Newton Rigg Ltd is committed to protecting personal information. This privacy notice sets out how we collect, use, store and destroy your personal information (this means any information that identifies or could identify you).

We are required to do this under the General Data Protection Regulation (GDPR), which replaced the Data Protection Act 1998.

Newton Rigg Ltd's privacy notice may change, so please remember to check back from time to time for updated changes. Where we have made any changes to this GDPR statement, we will make this clear on our website.

This notice provides employees with information about how their personal data will be used during their employment with the organisation.

Newton Rigg Ltd collects and processes personal data relating its employees to manage the employment relationship. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Information the organisation collects

Newton Rigg Ltd collects and processes a range of information about employees.

This includes:

- name, address and contact details, including email address and telephone number, date of birth and gender;
- terms and conditions of employment; • details of qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;

- information about remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of bank accounts and national insurance number;
- information about marital status, next of kin, dependants and emergency contacts;
- information about nationality and entitlement to work in the UK;
- information about criminal record;
- details of work schedule (days of work and working hours) and attendance at work;
- details of periods of leave, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures, including any warnings issued and related correspondence;
- assessments of performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- information about medical or health conditions, including disability for which the organisation needs to make reasonable adjustments; and
- equal opportunities monitoring information including information about ethnic origin, sexual orientation and religion or belief.

Newton Rigg Ltd may collect this information in a variety of ways. For example, data might be collected through application forms, CV, obtained from passports or other identity documents, from forms completed during employment (such as benefit nomination forms), from correspondence or through interviews, meetings or other assessments.

In some cases, Newton Rigg Ltd may collect personal data from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Data will be stored in a range of different places, including personnel files, HR management systems and in other IT systems (including the email system).

Why Newton Rigg Ltd processes personal data

Newton Rigg Ltd needs to process data to enter into an employment contract with employees and to meet its obligations under such contracts. In some cases, we need to process data to ensure that it is complying with its legal obligations, e.g. to check an employee's entitlement to work in the UK.

Newton Rigg Ltd has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows it to

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;

- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current/former employees or for mortgage applications; and
- respond to and defend against legal claims.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities).

Where Newton Rigg Ltd processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring. This is to carry out its obligations and exercise specific rights in relation to employment.

Who has access to data

Personal information may be shared internally, including with members of the recruitment team (including payroll), line managers, managers in the business area in which an employee works and IT staff, (if access to the data is necessary for performance of the role).

Newton Rigg Ltd shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. Newton Rigg Ltd may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Newton Rigg Ltd also shares your data with third parties that process data on its behalf

| Name of company/organisation | The service they perform |
|-------------------------------------|---------------------------------|
| Barclays Bank | Banking |
| Microsoft | IT hosting and email |
| Armstrong Watson | Accounting and payroll |

Newton Rigg Ltd will not transfer your data to countries outside the European Economic Area.

How Newton Rigg Ltd protects data

Newton Rigg Ltd takes the security of personal data seriously. It has internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties

Where Newton Rigg Ltd engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisation measures to ensure the security of data.

How long Newton Rigg Ltd keeps data

Newton Rigg Ltd will hold personal data for the duration of an employee's employment. The periods for which data is held after the end of employment are given in Appendix A.

Employee rights

As a data subject, employees have a number of rights:

- access and obtain a copy of your data on request;
- require Newton Rigg Ltd to change incorrect or incomplete data;
- require Newton Rigg Ltd to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Newton Rigg Ltd is relying on its legitimate interests as the legal ground for processing.

Employees may exercise these rights by contacting the data controller. If they believe that Newton Rigg Ltd has not complied with data protection rights, they can complain to the Information Commissioner.

Employee obligations

In connection with their own personal data all employees have a duty to; check that any information that they provide to Newton Rigg Ltd in connection with their employment is accurate and up to date; inform Newton Rigg Ltd of any changes or errors in information which they have provided eg change of address (Newton Rigg Ltd cannot be held accountable for errors arising from changes about which it has not been informed).

All personal data should be accessible to only those who need to use it. It should be stored in a secure environment, be password protected if computerised and only kept on portable storage media where absolutely necessary. All portable storage media containing personal data must be kept in a secure place.

Employees have obligations under their employment contract to provide the organisation with data. In particular, they are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. They may also have to provide the organisation with data in order to exercise their statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that they are unable to exercise your statutory rights.

Certain information, such as contact details, proof of the right to work in the UK and payment details, have to be provided to enable the organisation to enter a contract of employment. Not providing other information, will hinder the organisation's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

In the course of their employment employees may have access to personal information of other employees, customers and other contacts. Employees must follow the procedures on dealing with personal information to ensure that a breach of the GDPR, this policy and other related legislation does not occur. Personal Data should only be used in accordance with our Data Protection policy. Use of data for anything which is not necessary for the performance of the job will be subject to disciplinary proceedings.

Automated decision-making

Employment decisions are not based solely on automated decision-making.

Monitoring

Newton Rigg Ltd reserves the right to monitor email communications, internet usage and telephone calls to ensure responsible usage or where it feels that the business tools provided are being used for purposes other than business use. As such you should be aware that communications in the work environment may not remain private.



Appendix G – General Data Privacy Notice

Newton Rigg Ltd Privacy Notice

To: Staff, volunteers, work placements, students, visitors and customers

Newton Rigg Ltd is committed to protecting personal information. This privacy notice sets out how we collect, use, store and destroy your personal information (this means any information that identifies or could identify you).

We are required to do this under the General Data Protection Regulation (GDPR), which replaced the Data Protection Act 1998.

Newton Rigg Ltd's privacy notice may change, so please remember to check back from time to time for updated changes. Where we have made any changes to this GDPR statement, we will make this clear on our website.

How we collect information about you

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities, buy produce from us, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch via email, through the post, or in person.

When you interact with us through third parties: This could be if you make a booking through Eventbrite and provide your consent for your personal information to be shared with us.

When you visit our website: We use Google Analytics, a web analytics service provided by Google Ireland Ltd and reCAPTCHA service provided by Google. We gather general information which might include which pages you visit most often, and which services or information are of most interest to you. We use cookies to help our site run effectively. You can opt out of this type of data collection using the 'opt-out-cookie' which prevents any future data collection- please refer to the Google Privacy policy and Cookie policy at www.susansfarm.co.uk for more details.

What information we collect

The personal information we collect from you depends on how you interact with us for various services. As a minimum we will usually collect your name and email address.

Depending on the service you require we may also request additional information such as your date of birth, postal address, telephone number and emergency contact details.

For some people we may also collect information about your medical history, allergies, DBS information and certificate number, doctor's details, previous employment/volunteering details, qualifications, experience, referees, or training records.

For some people we may also collect, use and store your credit/debit card details if you are making a payment for products or services, however we never store credit/debit card details and these are destroyed once the transaction is complete, as well as information you provide in any communications between us.

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances.

Why we collect this information about you

We will mainly use this information:

- to manage employment
- to check entitlement to work in the UK
- to obtain occupational health advice
- to pay salaries
- to make a DBS check
- to deliver service safely
- to sell goods
- to contact you regarding future sales
- for internal records e.g. VAT
- to keep students safe
- to report to funders
- for promotion of our services
- To optimise our website and adapt its content

How we ensure that the processing we do is lawful

Newton Rigg Ltd cannot use your personal data for any reason unless we have a legal reason to do so.

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you such as employment contract where consent is not required and this would be classed as a 'lawful' reason for holding personal details about you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Newton Rigg Ltd to process your information to help us to achieve our vision and business commitments.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

How long we will keep your information for?

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations. For more details, please refer to our GDPR policy.

Who do we share your personal information with?

Newton Rigg Ltd will never sell or distribute your personal information to any other third parties or make it public unless we have a legal obligation to do so.

However, we may share your personal data with trusted third parties who work with us or perform services for us. We require them to take appropriate steps to protect your personal information, and only to use the personal information for the purpose of performing those specific services.

When Newton Rigg Ltd acts under instruction from another organisation there will be a contract in place for the purpose that will tell us what to do with your information. If any personal data is being used being used for a purpose that it is not controlled by Newton Rigg Ltd, you will be given a different privacy notice by the data controller which will tell you all about it.

How do we keep your information safe?

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately, the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below.

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our 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. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted below, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

How to complain

If you are unhappy about the way in which we handle your personal data please let us know verbally or in writing by contacting us at the address given below

We will explain how we have processed your personal information and if we have made a mistake will tell you how we will put this right.

If you are still dissatisfied, you may report your concern to the Information Commissioner's Office (ICO) by contacting: Wycliffe House, Water lane, Wilmslow, SK9 5AF, Tel: 0303 123 113 <https://ico.org.uk/>:

Contacting us

If you have any questions about this Privacy Notice, the practices of this site, or the dealings with this site, please contact us at:

The Dunmail Building, Newton Rigg Campus, Penrith, Cumbria, CA11 0AA
07940151563
support@nrtraining.co.uk