



## **PRIVACY POLICY**

DGC Training take your privacy seriously and have developed this policy to advise you why we may keep personal information about you, what we do with that information and how we keep it secure. This policy explains your rights in accordance with current legislation and how we comply with this legislation. This policy is equally relevant to our customers, business partners and staff.

### **Statement of Intent**

DGC Training may ask you to submit personal information about yourself. Personal Information is information about you that identifies you such as name, address, telephone number, National Insurance number etc. We ensure that our staff work to data protection principles which require information to be:

- Handled lawfully, fairly and transparently.
- Kept and used for clearly understandable and legitimate purposes.
- Required for a good reason and limited to what is necessary to be collected and used.
- Accurate and up to date.
- Not kept longer than necessary.
- Handled confidentially.
- Stored securely
- Not transferred to countries outside the European Economic Area without adequate safeguards in place.

## **Why do we keep information about you?**

We need to collect, hold and process information for a number of reasons. Below are examples of some of the purposes for which we may require to use your personal data.

To facilitate providing a training service to you and enable confirmation of your Identity, record keeping, registration, certification, payment and confirmation services in relation to this training service. This is a requirement of many of the governing bodies that accredit the training courses that we provide and that you undertake and the funding agencies that fund your training. We also need to share this information with these governing bodies and funding agencies and comply with these organisations data security policies in executing this. This information will also be used to remind you when you are due refresher training for the relevant qualification.

To gain feedback on how well we deliver our services and how we can improve our services for quality assurance purposes.

To monitor the performance and execute effective contracts including financial transactions with our service providers.

To manage contracts with our staff and sub contractors including administering payroll, tax, pensions, performance, sickness absence, annual leave, PVG membership, Qualifications, Work History/Experience, references, Insurance and Health & Safety.

## **What Information do we keep about you?**

Personal Information – such as your name, date of birth, National Insurance Number, contact details, Driving Licence Number, Customer Reference number, details of training you have received and results/certification,

Sensitive Information – such as your gender, physical or mental health, criminal record/court proceedings, religious beliefs.

We will never ask for unnecessary information beyond what is required to enable us to provide the service that you require. For example your national insurance number or Driving Licence Number may only be required for certain courses that you undertake and not others. We will never keep your information longer than is necessary and we will always keep it securely.

Information may be provided by you, a guardian or parent if you are a young person or may be passed to us by another organisation working with you. Information may be collected in a variety of ways such as paper format, online forms, emails, face to face, telephone, questionnaires, text messaging or image/audio recording devices.

### **What do we do with your information/Sharing?**

We may provide your information to another organisation engaged by us to process the data as a “data processor” or control the data as a “data controller”. This will only be in circumstances where it is necessary for the provision of a service to you or in executing a contract with you. For example we may need to pass your information to RTITB to accredit and certificate your forklift training or we may need to pass an employees details to HMRC for Payroll and National Insurance purposes. We will always ensure that the data controller or data processor that the information is being passed to has the appropriate information security policies in place. We will always gain your consent for this information sharing at induction. We will only use your information in ways that adhere to data protection legislation in force in the UK.

Access to your information by DGC Training and these specified third party organisations will be controlled to reflect the purposes and disclosure, held securely and with limited access by our own staff and staff at partners who work with us to provide the service. We shall endeavor to maintain your information in an accurate, up to date and secure manner always.

We may be required to share your information for legal purposes with agreed agencies such as the Health & Safety Executive or Police Scotland. This will only be in circumstances where there is a requirement for us to do this for the prevention of crime, fraud, accident investigation or for the safeguarding of individuals. Only in this instance we may not gain your prior consent for information sharing.

### **How long do we store your information?**

DGC Training will keep your information up to a maximum of seven years. This ensures that it complies with the requirements of our governing bodies, funding agencies and all legislative requirements.

### **How do we protect your information?**

DGC Training maintain a high standard of both physical and network security to protect paper and electronic forms of your data whilst gathering, processing, sharing, storing and disposing of this data.

Information that we hold is subject to safeguards to ensure that it is not accessed or disclosed inappropriately.

To ensure the confidentiality of our customers, staff and partners data we have this privacy policy, candidate data protection policy (including storage and sharing), data protection procedure and password protection policy in place and we ensure that staff are fully aware of these and the associated guidance in relation to your personal information.

### **DGC Training Website**

Our website [www.dgctraining.co.uk](http://www.dgctraining.co.uk) does not use cookies to trace what IP address you have visited from and will therefore not download cookies to your device. Our website does not automatically profile what pages you have visited and will not retain any of your information when visiting.

### **Recording Devices**

DGC Training Services sometimes use candidate and staff photos and videos for marketing purposes on our website and social media pages. We will always ask you to consent to your photograph or video to be used for this purpose prior to upload. It is a requirement for some of the qualifications we provide that we upload a head and shoulders photograph of you for the

purposes of providing a photo ID Card. In this instance it will be a condition of your training and we will only share this with the governing body i.e. the RTITB/IPAF to enable the production of a Photo ID Card. The instructor will usually capture the photo on his mobile phone or tablet and may have to email this to the office who will upload it securely to the IPAF Training Portal. The instructor and office staff will delete the photo from all devices once the photo card has been received and sent onto you. Our approved Apps for staff mobile devices are RTITB My Training Friend App, Microsoft 365 for emails and the Webex App for telephone calls.

### **CCTV Monitoring**

We operate closed circuit television (CCTV) systems at our premises for the purposes of ensuring the safety and security of our staff, visitors, property and assets. CCTV footage may capture images of individuals entering, leaving, or moving around our premises and records audio conversations.

The lawful basis for processing this data is our legitimate interests in maintaining a safe and secure environment. CCTV recordings are stored securely and retained only for as long as necessary, typically for no longer than 30 days unless required for the investigation of an incident or legal proceedings.

Access to CCTV footage is restricted to authorised personnel only. We may share footage with law enforcement authorities or third parties where required by law or where it is necessary for the establishment, exercise or defence of legal claims.

### **When we ask for your Personal Information we promise to:**

- Make sure you know why we need it; ask only for what we need and not collect too much or irrelevant information.
- Protect it and make sure no unauthorised person has access to it.
- Let you know if we will share it with other organisations and why and give you the opportunity to refuse that we share it.
- Make sure we do not keep it longer than necessary.
- Not make your personal information available for commercial use.
- Consider your request to stop processing data about you.

## **You can obtain further details regarding:**

- How to find out what information we hold about you and, in addition, ask us to correct any mistakes.
- Agreements we have with other organisations for sharing information.
- Circumstances where we can pass on personal information without telling you, for example, to help with the prevention or detection of crime.
- Our instructions to staff on how to collect, use or delete your personal information.
- How we check that the information we hold is accurate and up to date.
- How to make a complaint in the case that you think standards are not being met.

## **Your Rights**

As of 25<sup>th</sup> May 2018, you have a number of new rights available to you in terms of accessing the personal information we hold on you, understanding what we do with it and requesting that something be changed as follows:

**The right to be informed** - The right to be told about what we do with your personal information. This privacy policy is aimed at addressing this by providing you clear information on who we are, how to contact us, what we do with your personal information and why we do it.

**The right of access** - You also have the right to access the personal information we hold on you i.e a Subject Access Request (SAR).

**The Right to rectification** - You can request for your personal information to be corrected or updated.

**The Right to be forgotten** - You can also request for your personal information to be completely erased. We can do this for you when any of the following reasons apply:

- We no longer need your personal information to provide you a service.

- If you consented to us keeping the information in the first place, you can change your mind and withdraw that consent.
- There is no other good reason to use or hold your personal data.
- If your personal data has been used unlawfully.
- When a legal obligation requires us to delete the information.
- Where you are under the age of 16 and have signed up to an information society service.
- If we have made the personal information public or passed it on to other places and you request that information to be deleted, we will do all we reasonably can to get in touch with those sources and inform them that the information must be deleted on their side also. As previously stated information made public is only for promotional purposes on our website or social media and with your prior written consent and information is only shared with agreed partners for the purposes of providing a service to you or administering a contract or your employment.

**The Right to restrict processing** – You may restrict processing for a legitimate reason, we would still have the right to hold that information.

**The Right to Data Portability** – You may be able to obtain the information we hold about you and use it for your own purposes. Conditions apply.

Should you wish to exercise any of your rights above you can do this by submitting the subject access request in writing to DGC Trainings Data Protection Officer, Maureen Cunningham at the office address or via email [maureen@dgctraining.co.uk](mailto:maureen@dgctraining.co.uk)