



SP TRAINING

Privacy Notice

1. INTRODUCTION

SP Training is committed to protecting your privacy and security. This notice explains how and why we use your personal data, to ensure you remain informed and in control of your information.

From the 25th May 2018, SP Training will ask its customers to “opt-in” for marketing communications. This is due to a change to the rules which govern how we can communicate with you and a new regulation on personal data (the General Data Protection Regulation) coming into force in May 2018. Therefore we are introducing a new approach that relies on you giving us your consent about how we can contact you. This means you’ll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (email, phone, SMS or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact us by emailing info@sptraininguk.com, writing to SP Training, Carlisle Airport Business Park, Carlisle CA6 4NW or telephoning 01228 530132 .

We will **never** sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

Questions?

Any questions you have in relation to this notice or how we use your personal data should be sent to info@sptraininguk.com or addressed to The Managing Director, SP Training, Carlisle Airport Business Park, Carlisle CA6 4NW or telephoning 01228 530132.

2. ABOUT US

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by **System People Ltd** trading as SP Training (company no. **04593467** in England and data controller number **Z1862361**)

Address: Carlisle Airport Business Park, Carlisle CA6 4NW

For the purposes of data protection law, System People Ltd will be the data controller.

The Managing Director of SP Training is responsible for data protection.

3. WHAT INFORMATION WE COLLECT

Personal data you provide

We collect data you provide to us. This includes information you give when joining or registering, placing an order or communicating with us. For example:

- personal details (name, date of birth, email, address, ethnicity, national insurance number, driving license telephone etc.) when you engage our services;
- financial information (payment information such as credit/debit card or direct debit details. Please see section 8 for more information on payment security); and
- details of your existing levels of qualification

Information created by your involvement us

Your activities and involvement with SP Training will result in personal data being created. This could include details of qualifications you have gained for example

Information from third parties

We sometimes receive personal data about individuals from third parties. For example, the Education and Skills funding or awarding bodies for qualifications.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Sensitive personal data

We collect or store sensitive personal data (such as information relating to ethnicity, driving license, National insurance, residency status and qualification level) which is needed in order for us to provide the service you require.

Accidents or incidents

If an accident or incident occurs on our property, at one of our events, on one of our training courses or involving one of our staff then we'll keep a record of this (which may include personal data and sensitive personal data).

3. HOW WE USE INFORMATION

We only ever use your personal data with your consent, **or where it is necessary in order to:**

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) legitimate interests, provided your rights don't override the these.

In any event, we'll only use your information for the purpose or purposes it was collected for

Administration

We use personal data for administrative purposes (i.e. to provide a service to you). This includes

- maintaining databases of our clients past and present
- performing our obligations under contracts;
- fulfilling orders for services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

4. DISCLOSING AND SHARING DATA

We will **never** sell your personal data. If you have opted-in to marketing, we may contact you with information about our services.

We may share personal data with subcontractors or suppliers who provide us with services. For example, government funding agencies, awarding bodies or training providers delivering a service on our behalf. However, these activities will be carried out when necessary and under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

5. MARKETING

From 25 May 2018, we will ask our clients and suppliers to "opt-in" for some communications. This includes all of our marketing communications.

This means you'll have the choice as to whether you want to receive these messages.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact info@sptraininguk.com or addressed to The Head of Sales, SP Training, Carlisle Airport Business Park, Carlisle CA6 4NW or telephoning 01228 530132.

Anonymised data

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as improving our services, or to identify trends or patterns within our existing client base

8. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and our staff and infrastructure. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

9. STORAGE

Where we store information

Our operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we'll allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

Some training records and personal details that are associated with public funding must be kept by law for 6-12 years depending upon the particular funding source used

We continually review what information we hold and delete what is no longer required. We never store payment card information.

10. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to:

The Managing Director, SP Training, Carlisle Airport Business Park, Carlisle CA6 4NW or telephoning 01228 530132.

Complaints

You can complain to SP Training directly by contacting our Managing Director using the details set out above.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

11. COOKIES AND LINKS TO OTHER SITES

Cookies

Our website gathers anonymous data to enable us to analyse website usage and trends

Links to other sites

Our website contains hyperlinks to other websites. We are not responsible for the content or functionality of any of those external websites. If an external website requests personal information from you the information you provide will not be covered by this privacy notice. We suggest you read the privacy notice of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with SP Training.

12. CHANGES TO THIS PRIVACY NOTICE

We' will amend this Privacy Notice from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Notice will always be posted on our website.

This Privacy Notice was last updated on 03.05.2018.