

*Registered Office:
2 Zurich Avenue
Biddulph
Staffs ST8 7FA
Mobile: 07810838598
Email: sue.smctraining@gmail.com
www.smctraining.org.uk*



SMc Training Ltd Privacy and General Data Protection Regulation Policy (GDPR)

1. INTRODUCTION

This privacy notice provides you with details of how SMc Training Ltd collect and process your personal data.

Who we are:

SMc Training Ltd is the Data Controller and Processor and we are responsible for your personal data (referred to as 'we' in this privacy notice.)

We have registered as the Data Controller with the ICO as follows:

Organisation name: **SMc Training Ltd**

Registration reference: **A8347118**

We have a registered Data Protection Officer

Data Protection Officer name: **Lynne Pickles**

If you have any questions about this policy notice, please contact the person below:

Our full details are:

Full name of legal entity: SMc Training Ltd
Email address: sue.smctraining@gmail.com
Telephone number: 07810838598
Registered address: 2 Zurich Avenue, Biddulph, Staffs ST8 7FA

If you are not happy with any aspect of how we collect and use your data, please contact us so that we can try to resolve the matter with you.

If you do have an issue with how we collect and use your data, you have the right to complain to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk)

We would be grateful, if you do have a complaint, if you would contact us first so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please advise us if at any time your personal information changes, by emailing us at sue.smctraining@gmail.com



2. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity data** may include your first name, last name, maiden name, title and gender.
- **Contact data** may include your home address, email address and telephone numbers.
- **Financial data** may include your bank account details.

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive Data refers to data that includes details your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data.

3. HOW WE COLLECT PERSONAL DATA

We will only collect data about you from you directly. We will not request data from 3rd parties.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted.

Your personal data is only used:

- Where we need to perform a contract between us such as delivery of training or coaching
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data.



Purpose/Activity	Type of data	Lawful basis for processing
To deliver training or coaching	(a) Identity (b) Contract (c) Financial	Performance of contract with you

Marketing communications

We will not share your personal data with any third party for marketing purposes.

Change of purpose

We will use your personal data for the purposes for which we collect it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose; in which case, we will notify you and we will explain the legal ground of processing. You will have the right to withdraw consent for the use of your personal data at any time.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Service providers who provide IT and administration services.
- Professional advisors including lawyers, accountants, bookkeepers and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.



6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit the access to your personal data to those customers, contractors, agents and other third parties who have a need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

We will only retain your personal data 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.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

By law we have to keep basic information about our customers and invoiced training and coaching work provided (including Identity, Contact, Financial and Transactional data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see further information below.

8. YOUR LEGAL RIGHTS

Under certain circumstances you have rights under Data Protection Laws in relation to your personal data.

GDPR includes rights for individuals:

The right to be informed

- The term 'personal data' is any information relating to an identified or identifiable living individual
- The type of 'personal data' we hold is listed under **section 2**.
- When do we collect personal data?

We are committed to being honest and respectful in collecting and using your personal data. We collect your personal data when you:

- Enquire or book a training course or coaching session via SMC Training Ltd
- Book a training course or coaching session
- Visit us and/or speak to us

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The right of access

At any point an individual can make a request relating to their data and SMC Training Ltd will provide a response with 20-working days.

Please note, we will always try to respond to all legitimate requests within 20-working days. Occasionally it may take us longer than 20-working days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your rights.) This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to access your personal data (or to exercise any other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

The right to rectification – if records are inaccurate, an individual may appeal to have them changed.

As stated above, it is important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at sue.smctraining@gmail.com

The right to erasure

An individual can request deletion of personal data where there is no compelling reason for its continued use. However, SMC Training Ltd has a legal duty to keep certain records for a reasonable time (e.g. financial records held for up to 6-years for tax and accounting purposes, before they need to be erased). This data is archived in a locked, fireproof cabinet and shredded after the legal retention period.

The right to restrict processing

An individual can prevent any further processing of your data, although SMC Training Ltd may retain the information. This means that records can be stored but cannot be used in any way (e.g. reports or for communications).

The right to data portability

An individual can request SMC Training Ltd to securely move, copy or transfer their data.

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The right to object

An individual can take issue with how their data is used or stored and they can officially object.

Rights in relation to automated decision-making and profiling – where automated decisions are made without human intervention, often for profiling reasons, individuals may choose not to be subjected to it and must be offered a human point-of-contact.

SMc Training Ltd does not use personal data for such purposes.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at sue.smctraining@gmail.com

9. COOKIES

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org

SMc Training Ltd website is powered by Create Ecommerce

Cookie Name	Purpose
Essential Website / Session Cookies	These are strictly necessary cookies that enable your site to function as intended and are mainly used by online shops.
Analytical / Performance Cookies	These enable Create Ecommerce to monitor the performance of the site (page loading speeds, etc) to ensure that everything is functioning correctly.

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This policy was written by SMc Training Ltd
Policy date: 29th May 2018

This notice

We will update this notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Questions

If you have any comments or questions concerning this notice, please contact sue.smctraining@gmail.com

29/05/2018