

GDPR: DATA & PRIVACY NOTICE FOR CUSTOMERS

Introduction

Telham Training Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of business and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

- **Definitions**

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

- **Who are we?**

Telham Training Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Telham Training Ltd, 135A Hastings Road, Battle, East Sussex TN33 0TL Tel: 01424 775191 Email: info@telhamtrainingltd.co.uk. For all data matters contact Sarah White on 01424 775191 or info@telhamtrainingltd.co.uk

- **The purpose(s) of processing your personal data**

We use your personal data for the following purposes:

- In the course of providing customers goods and service, where you may give us information by corresponding with us by phone, e-mail or otherwise.

- To manage our employees
- This includes information you provide when you report a problem with our website.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data – such as name, address, e-mail address and phone number

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Consent of the data subject;	
<input checked="" type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Written or verbal contract via telephone, email or letter
<input checked="" type="checkbox"/> Processing necessary for compliance with a legal obligation	HMRC – Corporation Tax
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	

b) Special categories of personal data (article 9 of GDPR)

We do not process special categories of data i.e. racial or ethnic origin, political opinions, genetic data, religious or philosophical beliefs, trade union membership, biometric data (finger prints), physical or mental health or sexual life.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with your permission or to statutory bodies if requested by them.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for a period of 7 years in order to comply with statutory company regulations and in case of any legal claims/complaints.

8. Providing us with your personal data

We require your personal data as it is a statutory requirement necessary to enter into a contract with you.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority)); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer personal data outside the EEA (European Economic Area).

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Subject Access Request

You have the right to request a copy of the information we hold about you verbally or in writing. This will be provided free of charge.

We will provide the information without delay and at least within one calendar month of receiving the request. We can extend this by a further two months for complex or numerous requests but in which case we will inform you and give an explanation.

We will have to ask you to verify your identity (or that of the person making the request), using "reasonable means" to ensure that we only pass the information to the individual to whom it belongs.

Please note that we are able to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive for the same information or for further copies of the same information that's previously been provided.

13. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

14. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

15. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative – Sarah White on 01424 775191 or info@telhamtrainingltd.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.