

# **Privacy Notice**

## PRIVACY AND DATA PROTECTION POLICY

#### 1. Introduction

1.1 Safety First Aid Training holds and processes information about learners, corporate clients, and other data subjects for administrative, approval and commercial purposes. When handling such information, Safety First Aid Training and all staff or others who process or use any personal information, must comply with the General Data Protection Regulation.

Under the General Data Protection Regulation, you have:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

### 1.2 Definitions

"Staff", "learners" and "other data subjects" may include past, present and potential members of those groups including other terms including 'Learner', 'Student', 'Delegate', 'Trainer'. 'Assessor', AoFA Qualifications, etc.

"Other data subjects" and "third parties" may include contractors, suppliers, contacts, referees,

approving, awarding and monitoring organisations and bodies etc.

"Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

#### 2. Notification of Data Held

2.1 Safety First Aid Training shall notify all staff and learners and other relevant data subjects of the types of data held and processed by Safety First Aid Training concerning them, and the reasons for which it is processed. The information which is currently held by Safety First Aid Training and the purposes for which it is processed will be amended when processing for a new or different purpose.

### 3. Responsibilities

- 3.1 All people in which information is held shall
  - ensure that all personal information which they provide to Safety First Aid Training is accurate and up-to-date;
  - inform Safety First Aid Training of any changes to information, for example, changes of address;
  - check the information which Safety First Aid Training shall make available from time to time, in written or automated form, and inform Safety First Aid Training of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. Safety First Aid Training shall not be held responsible for errors of which it has not been informed.

### 3.2 Staff shall ensure that

- all personal information is kept securely;
- personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.
- 3.3 When staff supervise learners doing work which involves the processing of personal information, they must ensure that those students are aware of the General Data Protection Regulation, in particular, the requirement to obtain the data subject's consent where appropriate.

## **4 Learner Responsibilities**

4.1 All learners shall

- ensure that all personal information which they provide to Safety First Aid Training is accurate and up-to-date;
- inform the Safety First Aid Training of any changes to that information, for example, changes of address;
- check the information which Safety First Aid Training shall make available from time to time, in written or automated form, and inform Safety First Aid Training of any errors or, where appropriate. Safety First Aid Training shall not be held responsible for errors of which it has not been informed.

### **5 Rights to Access Information**

- 5.1 Staff, Learners, Corporate Clients, Approving or Awarding Organisations and other data subjects in Safety First Aid Training have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to Safety First Aid Training.
- 5.2 Safety First Aid Training aims to comply with requests for access to personal information from Staff, Learners, Corporate Clients, Approving or Awarding Organisations and other data subjects, as quickly as possible, unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the Information Security Officer to the data subject making the request.

### **6 Subject Consent**

6.1 Safety First Aid Training may ask for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma, arthritis. Safety First Aid Training will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency or in carrying out physical activities.

## 7 The Data Controller and the Designated Data Controllers

- 7.1 Safety First Aid Training is the data controller under the Act, and is ultimately responsible for implementation
- 7.2 Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

**Digital Marketing Service Providers** 

- 7.3 Digital Marketing Service Providers. We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:
  - (i)Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: http://sopro.io. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io."

### **8 Assessment Marks & Learner Certificates**

8.1 Learners shall be entitled to information about their marks for assessments, however this may take longer than other information to provide.

## **9 Retention of Data**

9.1 Safety First Aid Training and AoFA Qualifications will keep different types of information for differing lengths of time, depending on legal, awarding or approving body and operational requirements.

## **10 Compliance**

- 10.1 Compliance with the Act is the responsibility of all learners and members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings.
- 10.2 Any individual, who considers that the policy has not been followed in respect of personal data about him- or herself, should raise the matter with Safety First Aid Training.