

## PRIVACY POLICY

---

Roxby Training Solutions Limited are committed to protecting and respecting your privacy. This policy sets out the basis for processing personal data which is collected from you, or that you provide to us. For the purpose of which you are providing your personal data and for the purpose of the GDPR (the 'regulation'), the data controller (or entity responsible for the data collected) and the data processor will be Roxby Training Solutions Ltd.

### Information we may collect from you and how we collect it

Roxby Training Solutions Limited may collect and process the following data:

- Information acquired/provided through our website. This includes information provided at the time of subscribing to our services, the time of registering an enquiry or making a booking, participating in discussions via social media functions, posting material or requesting further services
- If you contact us via email, post, telephone or voicemail we may keep a record of that correspondence
- If you or your employer submit a completed booking / attendance form to us - inclusive of a third party registration form
- Identification details, name, address, email address and phone number
- Date of birth - for the purpose of course enrolment
- National insurance number - for the purposing of course enrolment
- Photographs - for both marketing and awarding body enrolment / certification purposes
- If you send us personal data via email, we may keep your email and email address. We may also collect information that is available from your email signature
- Payment details (bank / building account details) for employees, sub-contractors and customers who make payment(s) via bank transfer.
- Details of transactions you carry out through our website and of the fulfilment of your booking
- Details of your visits to our website including, but not limited to, traffic data, location data and other communication data
- On being provided with a business card
- From third parties such as companies who are making bookings on a candidate(s) behalf

- From awarding bodies in which an individual has registered an enquiry through
- For perspective employees / subcontractor's
  - identification details relating to name and contact details
  - CV's, copies of references, cover letters / application forms copies of qualifications
  - Bank account details
  - Employment Contract / Sub-Contractors agreement
  - Employment records such as but not limited to; appraisals / performance reviews, records of disciplinary actions, details of remuneration / salary, history of employment
  - Health records such as but not limited to; completion of medical questionnaire

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

### **How we use your data**

Your data will only be used for the purposes indicated when you submit the data or as detailed under this privacy policy.

We use personal information held about you in the following ways:

- to update and enhance our records
- to compile information relating to your use of our products and services and make recommendations about goods and services and other areas that may interest you
- to provide you with newsletters and updates about Roxby Training Solutions Ltd
- to carry out our obligations arising from any contracts entered into between you and us to provide you with the information, products and services that you request from us
- to provide you with information about goods and services similar to those which were the subject of a previous enquiry, sale or negotiations of a sale to you. You can opt out of such notifications at any time by following the instructions on marketing platforms used by Roxby Training Solutions or by notification of writing to [training@roxby.com](mailto:training@roxby.com)
- In accordance with the requirements of our accreditations / awarding bodies, where applicable e.g. enrolment, certification purposes, to confirm identities to prevent fraudulent certification circulation etc.
- to process and finalise the purchase of services and products
- to undertake research and analysis of those products and services used
- to contractually engage in employment or sub-contracting services
- For the purposes of obtaining business, such as but not limited to supplying employee / sub-contractor qualifications / CV's for tender opportunities, providing copies of passports for visa purposes.

If personal data has been provided on behalf of an individual e.g. from a third party or current employer, the information will be processed in the same manner as that obtained directly.

## Disclosure of your data

We will share the information with awarding bodies when required for registration / certification purposes. We will not transfer any of your data to any third parties without your permission or unless indicated in this privacy policy or agreed by you on a form issued from Roxby Training Solutions Ltd.

We may disclose your personal information to third parties without obtaining further consent from you including:

- where we outsource any of our business functions under which we collect or store your data, in which case we will ensure that any such service provider adheres to at least the same obligations of security with regard to your data as undertaken by us
- where we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect our rights, property, or safety of our employees, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Your employer, where we are contractually obliged to do so For payroll / payment purposes never sell your data to third parties for the purposes of marketing.

We will never sell your data to third parties for the purposes of marketing.

## Where we store your data and how we keep it safe

The data that we collect from you may be transferred to and stored both as hard and electronic copies e.g. filing cabinets, databases and / or Customer Relationship Management System, The Cloud. All hard copies of documents are stored in filing cabinets, which are stored relative to their importance and restricted to Roxby Training Solutions Ltd authorised personnel only.

We use strictly controlled access and ensure personnel who are authorised for this access are informed as to how to keep your information safe. For those details that are stored electronically, username and password systems are operated to gain access to desktop computers, along with relevant anti-virus software, firewalls being installed, maintained and monitored by our IT Consultants to prevent corruption and hacking to PC's and servers.

## Communication of data

All data is communicated in a number of ways e.g. telephone, dedicated mail / courier services, email and what other means is required. Roxby Training Solutions make every effort to keep data secure during this process.

## Payment details

We use your payment details to finalise bookings and orders. By the means of processing card payments, this will be processed by a reputable third party such as Worldpay, PayPal. By providing and/or submitting your personal data to us, you agree to this transfer, storing or processing. Once the transaction has been confirmed, all card details will be destroyed and only the confirmation of the transaction will be retained. Please note that these organisations have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these before you submit any personal details. By the means of processing and issuing BACs payments,

bank and building society details are recorded. Only accounts personnel have access to these details to carry out the required transactions.

### **How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary. All hard copy records are destroyed after a period of 7 years.

### **Your rights**

You have the right to ask us to remove your details from our records or ask us not to process your personal data for marketing purposes. If you wish to change your mailing preferences or opt-out of specific marketing communications sent from Roxby Training Solutions Ltd, you may notify us via writing or email at the following details.

Address: Roxby Training Solutions Ltd, Unit W1, Wellington Court, Preston Farm Business Park, Stockton on Tees, TS18 3TA

Email: [training@roxby.com](mailto:training@roxby.com)

On receiving your communication, changes will come into immediate effect.

### **Access to your data?**

The Regulation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Regulation. Any access request may be subject to a fee (as amended from time to time) to meet our costs in providing you with details of the information we hold about you.

If you would like to request a copy of your personal data under the regulation or have any other related queries, please email [training@roxby.com](mailto:training@roxby.com)

### **Accuracy**

We will take reasonable steps to create an accurate record of any personal data you have submitted. However, we do not assume responsibility for confirming the ongoing accuracy of your personal data. You can update your personal data by emailing us at [training@roxby.com](mailto:training@roxby.com) or by calling us on (0)1642 438 700.

### **Changes to our Privacy Policy**

This policy is reviewed on an ongoing basis and formally reviewed at least annually during management review and the latest version will always be available on our company website or upon request.

### **How to make a complaint**

To exercise all relevant rights, queries or complaints, please in the first instance contact Joanne Dean on (0)1642 438 700 or via email [training@roxby.com](mailto:training@roxby.com)

If this does not resolve your complaint, you have the right to log a complaint with the Information Commissioners Office on 03031231113 or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.