

## **Privacy Notice for Goal Achievement Limited T/A GA Training**

### **ABOUT US**

Our full legal name is Goal Achievement Limited. T/A GA Training.

We are a limited company incorporated in England and Wales. Our registered company number is 334 3326 and our registered address is Highstone House, 165 High Street, Barnet, Hertfordshire, EN5 5SU.

We are the data controller of the information you provide us with. This term is a legal phrase used to describe the person or entity that controls the way information is used and processed.

We are registered with the Information Commissioner's Office in the UK. Our registration number is ZA387789

Our Data Protection Officer (DPO) is responsible for maintaining this policy. Our DPO is Kristy Smee and can be contacted via email at [info@ga-training.com](mailto:info@ga-training.com) or by post to: Data Protection Officer, GA Training, Highstone House, 165 High Street, Barnet, Hertfordshire, EN5 5SU.

### **ABOUT THIS POLICY**

Your privacy is extremely important to us, so we want you to know exactly what kind of information we collect about you and how we use it.

We've set out all the details below.

Please take the time to read and understand this policy. And bear in mind that by using our websites, contacting us by telephone or by providing information to us by way of social media, you agree to its terms.

GA Training is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

We reserve the right to change this policy from time to time and will do this by updating this page. You should periodically revisit this page to make sure you are happy with any changes that have been made.

At GA Training we will never misuse your data. We will never sell your data and we have never had a security breach.

This policy is effective from 22<sup>nd</sup> May 2018.

## **PURPOSE OF THIS PRIVACY NOTICE**

This notice sets out how GA Training holds, processes and treats personal data and special category data. Personal data is, briefly, information about a living individual which can identify them. In the context of the majority of the information GA Training holds, this information is your name, company name, job title, address, email and telephone number (used primarily for managing and promoting events, news and resources).

Special category data (formerly called sensitive personal data) is, briefly, personal data that is sensitive and must be treated with more care. In the context of GA Training, this will only ever be for food preferences at one of our training courses.

Anyone who requires further information please visit the Information Commissioner's website – [www.ico.org.uk](http://www.ico.org.uk) – or contact Kristy Smee, at [info@ga-training.com](mailto:info@ga-training.com)

## **THIRD-PARTY LINKS**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **WHY DO WE COLLECT YOUR DATA?**

- Performance of contract – we have to collect some data in order to give you a service.
- Legal obligation – we may have to collect some of your data by law.
- Legitimate interest – this means we can collect and use your data for legitimate reasons, in a way that most people would think reasonable. For example if you provided your email address and enquired about a training course, you might reasonably assume that we'd use your email address to update you about certain courses in your areas of interest. You can opt out at any time to this by emailing [info@ga-training.com](mailto:info@ga-training.com) or by clicking unsubscribe in some cases.

## **WHAT INFORMATION DO WE COLLECT AND HOW?**

We only collect information that we know we will genuinely use. We will only use your personal data when the law allows us to.

All information you choose to submit to us. You can do that in a number of different ways:

- By filling in forms, for example when you make an enquiry about one of our courses on our website, sign up to offers or download a resource such as a white paper from our website.
- By sending us emails and text messages (SMS or MMS).
- By using our live chat service on the website.

- By adding posts, reviews and other comments to any of our websites, mobile apps or other community forums.
- By liking or disliking our offers and promotions;
- By interacting with us on social media platforms such as Facebook or Twitter etc.
- By talking to us in person or over the telephone. For example, when enquiring about our services or making a complaint.
- Applying for a job with GA Training.

(Important: If you submit details to us of any other person (e.g. a friend) please make sure you have their permission first.)

The information we hold on file is usually:

### **Personal Information**

- Name
- Job title
- Company name
- Phone number, including mobile where provided
- Email
- Address
- Course attendance history
- Area of interest for our services offered
- Dietary requirements if attending one of our courses

### **Financial payment information**

We do not request or store any your personal financial information such as credit card details. All payments for places on our training courses are handled securely by Eventbrite.

Eventbrite also does not keep or hold your credit card information on file by default. You can opt to save a payment card when you create your personal Eventbrite account, and this can be deleted any time.

For more information please visit on how Eventbrite processes payments please visit <https://www.eventbrite.co.uk/security/>

### **Technical Information**

We might collect information about the kind of device you are using to view our sites e.g. mobile, laptop, tablet etc. and also where in the world you are accessing our content from. We might also collect things like your IP address, type and version of your internet browser, the operating system you use and your time zone setting. Further details can be found in our cookie policy here: <https://www.contractlawtraining.co.uk/cookie-policy/>

Don't forget that with modern technology, you have more and more personal control over what information we and other organisations collect. For example, you can

normally delete cookies and tracking technologies sent to your web browser. You can also change related settings to restrict them going forward, such as by using a private browsing mode (although this may affect your browsing experience on some websites). Plus, you can use the settings options in your mobile devices to restrict what sort of information websites and mobile apps are able to access and use about you.

Online advertising networks, social media platforms and search engines (Google etc.) also provide tools to manage the data they collect about you, and how it is used and shared. We urge you to look out for these functions and tools and use them to manage your privacy in a way that suits you best.

## **HOW WE STORE YOUR DATA**

We store personal data and learning records on our CRM system and on secure data servers. All GA Training users have a two-factor authentication for log in to the CRM and their passwords to access it must be changed every 3 months. We also have event log reporting enabled so that any downloads of data from our CRM require sign off by our Data Processing Officer.

Any personal information that is not securely stored on our CRM and is kept on a data server (for example, a delegate list from one of our training courses) is password protected.

## **WHAT DO WE DO WITH YOUR DATA?**

We want to be able to provide you with the best service, so we therefore gather your data to understand your needs and to enable us to personalise our service to you. In particular this information will be used for:

- Providing a tailored and personalised service to clients and customers with products and services most likely to interest you
- To plan and host training events and courses
- To process and acknowledge a job application you may make
- To respond to enquires
- To carry out sales and marketing activities
- Internal audit purposes
- Improving our service
- Periodically send promotional communications which we think you may find interesting using the contact details which you have provided. We may contact you by email, phone, SMS or mail. The lawful basis on which we process data for this purpose includes:
  - If you're a customer – customer or contractual consent
  - If you've enquired about our service – either consent (where we're obliged to obtain), or legitimate interest will apply.

## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us, or if you have provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Opting out**

You can opt out of receiving marketing information from us whenever you want. This can be done by emailing [info@ga-training.com](mailto:info@ga-training.com).

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at [info@ga-training.com](mailto:info@ga-training.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **DATA RETENTION AND DESTRUCTION**

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.

We will keep basic data such as name, address and email address for ten years after attendance at and / or purchase of one of our training programmes. We do this as part of our commitment to “lifelong learning” and for the purposes of helping our

learners who may need a historic record of the training they have undertaken for certification or accreditation. After 10 years, we may anonymise the data as it is still important for us to have records of attendance at our training programmes.

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 (including Contact, Identity, Financial and Transaction Data) for at least six years after they cease being customers for tax purposes.

Details of other retention periods for different aspects of your personal data are contained in our retention policy which you can request from us by contacting us at [info@qa-training.com](mailto:info@qa-training.com).

In some circumstances, you can ask us to delete your data and in some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **WHO DO WE SHARE YOUR INFORMATION WITH?**

In order to provide our services, we may need to share your personal information with a third-party such as one of our external course venues or a sub-contracted training consultant. When this happens, all data sent is contained in a password protected format.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

All of our third party parties will comply with this privacy policy.

## **International transfer of your data**

Although we're based in the UK, we use suppliers from many parts of the world to help ensure you receive the very best in products and services from us. To allow us to run our business on this basis, the information we collect may on occasion be transferred outside of the EEA. This is purely for storage purposes only – for example on email servers and using cloud storage – we will never sell your data for use by any third party.

Naturally, we aim to ensure all our suppliers take information security as seriously as we do. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we only transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please us at [info@ga-training.com](mailto:info@ga-training.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 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 access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. 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.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Complain / object to the processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can withdraw consent at any time by emailing [infor@ga-training.com](mailto:infor@ga-training.com)

#### **Other**

We will be transparent with the data subjects, specifically, and our customers in general, if any personal data is lost, stolen or compromised.

Any individual wanting to exercise any of these rights should email [info@ga-training.com](mailto:info@ga-training.com)

Further information about your information rights is available on the ICO's website [www.ico.org.uk](http://www.ico.org.uk)

Any individual wishing to know what personal data of theirs is held by the GA Training should enquire in writing to Kristy Smee, GA Training, Highstone House, 165 High Street, Barnet, Hertfordshire, EN5 5SU. We will respond to this request in full within one month from receipt of the request. No fee will ever be charged to fulfil a request for personal data.