

General Data Protection Regulations

Prepared on Tuesday, April 21, 2020

LC Education & Training Ltd
245 Walsall Road, Birmingham , England, B42 1TY

GDPR Statement

Introduction

Data protection and your privacy matter to us at LC Education & Training Ltd. This document outlines our obligations under the new GDPR Act, and ensures that we treat your personal data with the utmost respect.

The EU General Data Protection Regulation (GDPR) act reinforces the 1995 EU Data Protection Directive, strengthening the rights that individuals have regarding personal data.

We are committed to taking every step necessary to protecting your data, and have taken measures to ensure that privacy and security protections are built into the service(s) we provide to you.

This policy (together with our standard terms of use and any other documents referred to on it) outlines when and why we collect personal data, how we use it, and the conditions under which we may disclose it to others. It governs the manner in which LC Education & Training Ltd ('we') collects, uses, maintains and discloses information we collect about individuals ('you'), and applies to all products and services that are offered by LC Education & Training Ltd.

Should you wish to discuss any part of our GDPR Statement with us, please get in touch with us.

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Privacy - You Right to be Informed

An important part of the GDPR is the Right to be Informed about what information we have. The following data types are stored and used by LC Education & Training Ltd as part of our normal business activities:

| Data Type | Details | |
|--|----------------------|---|
| Email Addresses | Purpose | Customer Identification, Marketing |
| | Retention Period | 2 years |
| | Basis for Processing | Legitimate Interest |
| | Source | Website, Social Media, Business Card, Existing Customer |
| Telephone Numbers | Purpose | Customer Identification, Marketing |
| | Retention Period | 2 years |
| | Basis for Processing | Legitimate Interest |
| | Source | Website, Social Media, Business Card, Existing Customer |
| Address | Purpose | Customer identification, sending certificates |
| | Retention Period | 2 years |
| | Basis for Processing | [edit], Consent, Contract |
| | Source | [edit], Existing Customer |
| Bank Details | Purpose | Paying invoices |
| | Retention Period | For the duration of the membership |
| | Basis for Processing | [edit], Contract |
| | Source | [edit], Existing Customer |
| Criminal Offence Data | Purpose | Required by some third parties for working with young people |
| | Retention Period | 2 years |
| | Basis for Processing | [edit], Legal Obligations |
| | Source | [edit], Existing Customer |
| Disabilities and learning difficulties x | Purpose | For providing relevant and appropriate training and resources |
| | Retention Period | 2 years |
| | Basis for Processing | [edit], Consent |
| | Source | [edit], Third-Party Data, Existing |

Customer

Lawful Basis

Data Controller/Processor

We are a 'data controller', which means that we (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed. We have overall control over the 'why' and the 'how' of our data processing activities.

Data

Whose Data do we Collect?

LC Education & Training Ltd needs to collect and use personal data in order to fulfill our obligations as an organisation. This policy describes how this personal data must be collected, handled and stored to meet our data protection obligations - and to comply with the law.

We only ask for information about you that helps us to help you, and we don't ask for any information that has no specific purpose.

We store information about:

- Customers
- Suppliers
- Business Contacts

Lawful Basis for Processing

LC Education & Training Ltd has a legitimate need to process and store your personal data. It is in our legitimate interest to provide you with the best possible service we can, to ensure that we meet your expectations, and if necessary, for marketing purposes. If you are not happy about this, in certain circumstances you have the right to object and/or the right to restrict processing.

- The individual has given clear consent for us to process their personal data for a specific purpose, e.g. fulfilling an order
- The processing is necessary for a contract we have with the individual

Use of Data for Specific Purposes

We may use the personal data you supply for our purposes where we deem it necessary in our legitimate interests.

We will need your consent for some of the activities that may not be covered by our legitimate interests, for example the collection of data via cookies and the delivery of direct marketing through digital channels such as email subscriptions. Where we need to obtain consent we do so in an open, transparent and clear way so that you know exactly what you are signing up for, why we need your information and how will intend to use it.

If you are not happy with the way we collect your personal data, you have several rights which you can exercise at any time. Please see the section on 'Your Rights' in this document.

We may use your personal information to help us to exercise or defend any legal claims that may arise.

Below are the ways that we may use and process your personal data, although please note that this list is not exhaustive.

- For carrying out our obligations and contracts with us and our customers
- To comply with our legal obligations, including crime, tax or duties
- For marketing purposes
- To send details of promotions, offers and events
- To communicate with individuals in the course of our business
- To enable us to develop and market other services and products
- To carry out satisfaction surveys and testimonial requests
- To conduct online training

Personal Data Types

We collect information to help provide our users with better services. The information we collect, and how we use that information you supply, depends on how you use our service(s), and how you manage your privacy controls. We collect and use the following personal data about our staff and/or customers:

- Email Address
- Address
- Postcode

Sensitive Personal Information

We store the following sensitive personal data about our staff and/or customers:

- Other (please state below)
- Your payment details will be collected by a secure third party and will not be accessible to LC Education & Training Ltd.

Criminal Offence Data

LC Education & Training Ltd does not store any criminal offence data about any individual.

The Ways we Collect Data

LC Education & Training Ltd collects a limited amount of personal data to enable us to fulfill our contractual duties to you or to other organisations. Additional items of information may be needed to help us keep our relationship with you working smoothly.

In the event that you access our website, read an email, or click on a link in an email we send to you, we may also collect certain data automatically or through providing it to us, including data such as your IP address and cookies, the latter of which make your interaction with our website(s) smoother and more intuitive, providing you with a better, more customised experience.

We collect this information from the following sources:

- Directly from the individual
- From third-party sources
- From our website (including cookies)

- From individuals emailing us
- From the use of social media channels such as Facebook or Twitter

Third-Party Data

In some circumstances, it may be necessary for us to collect and use personal information from a third-party source.

Where appropriate, we may seek more information about you from alternative third-party sources, and always in accordance with any local laws and requirements. This may include market research through a third-party, from delegate lists from events, and other organisations we may employ to collect this data.

We have taken steps to ensure that we are compliant with GDPR as follows:

- We know how and where this information was compiled
- Consent was sought to obtain this information

Sharing of Personal Data

From time to time, LC Education & Training Ltd may share personal data with another organisation (another data controller). The circumstances and purpose of sharing this personal data may depend on the nature of the service provided, but we will be clear when this happens, and for what purpose. In all cases, the information sharing will be reasonable and expected, and will be clear who is involved.

If you are concerned about data sharing, get in touch with us and we will be able to tell you whether information is being shared with another organisation. We will explain what the information is, who it is being shared with, and why. Alternatively you can see our Privacy Statement. You also have additional rights under the GDPR, including the right to access your information, a right to rectification, a right to erase your data, a right to restrict processing and a right to object.

- Third-party service providers where we have an appropriate protections in place
- Official authorities (e.g. HMRC) when asked to do so by law

Children's Data

LC Education & Training Ltd may process the personal data of children under the age of 16 in its normal business activities. In these cases we operate in accordance with local laws and requirements at all times.

We operate the following principles when storing the personal data of children under the age of 16:

- We have carefully considered the language of privacy notices
- We have obtained valid consent
- We operate with children in mind from the outset, using data protection by design
- Our processing is fair and complies with the data protection principles
- We consult with children as appropriate when processing information

Data Transfer

Data Portability

LC Education & Training Ltd does not transfer data out of the European Economic Area (EEA).

Automated Decision-Making

LC Education & Training Ltd does not profile any of our customers or staff for the purpose of marketing or advertising purposes.

Consent

Information about individual's personal or sensitive information has been freely given by the data subject. We also take the following measures to ensure that we obtain explicit consent before using or storing their information:

- Consent was freely given at the point of purchase
- Consent was clearly distinguishable in an accessible, distinguishable manner
- We can demonstrate that the individual gave their consent
- Individuals have the ability to withdraw their consent at any time.

Website Data Collection

LC Education & Training Ltd may collect a limited amount of data from our website users which we use to help us to improve your experience when using our website, and help us to manage the services we provide.

We may also use data from your use of our websites to enhance other aspects of our communications (including marketing) with you. Any communications to and from LC Education & Training Ltd and you may be reviewed and monitored as part of internal or external investigations or for legal reasons as required to under law.

The data we collect may consist of the following information:

- Cookie Information

Cookies

A cookie is a small file that is sent to your device when you visit a website. It allows websites to recognise you when you next visit the website, and helps to customise the information you see when you revisit. Cookies may store user preferences and other information that helps to provide a better service whilst using the website.

You can configure your browser to refuse all cookies, or to display which cookies are being sent to your device. Although you can disable cookies, some features or services may not function properly.

Data Protection by Design

Because data privacy and protection is important to LC Education & Training Ltd, we've taken measures to integrate data protection into our business practices and activities, from the design stage right through the lifecycle. We've put in place appropriate technical and organisational

measures that are designed to implement the data protection principles, including:

- We integrate privacy and data protection compliance from the start of new projects

Individual Rights

Right to be Informed

Privacy Statement

You can request to see our Privacy Statement at any time, which outlines our obligations under the GDPR regulations. Our Privacy Statement includes the following:

- Name and contact details for our organisation
- Purposes of the processing
- Lawful basis for the processing
- Legitimate interests for the processing (if applicable)
- Categories of personal data obtained (if not obtained from the individual)
- Rights available to individuals in respect of the processing
- The right to withdraw consent (if applicable)

Right to Access

- Individuals have the right to access their personal data
- We may store supplementary information, which we will supply when requested to do so
- A copy of the data can be provided free of charge
- We may charge a reasonable fee to comply with requests for further copies of the same information
- We will provide the information without delay, within one month of receipt of the request
- We may extend the period of compliance by an additional two months where requests are complex or numerous
- We may charge a reasonable fee if a request is manifestly unfounded or excessive
- We may refuse to respond if a request is manifestly unfounded or excessive
- If we refuse, we will explain why, and inform them of their right to complain
- We provide information in a commonly used electronic format
- We verify the identity of the person making the request using 'reasonable means'
- Individuals can access our self-service system to provide the data with direct access to their information
- Where we process a large quantity of information about an individual, we may ask to specify the information the request relates to

Right to Rectification

- We have systems in place to identify and respond to rectification requests
- We have a policy in place for how to record requests we receive
- We understand that in certain cases we may refuse requests
- We respond to requests for rectification without undue delay, and within 1 month of receipt
- We may extend the time limit to respond to complex requests
- We have procedures in place to inform individuals if we rectify any data we have shared

with them

Right to Erasure

- We have a policy for how to record requests we receive
- We are able to recognise a request for erasure, and understand when the right applies
- We may refuse a request, and will provide details to individuals when we do so
- We respond to a request for erasure without undue delay, and within 1 month of receipt
- We may extend the time limit to respond to more complex requests
- We place particular emphasis on the right to erasure if it relates to data collected from children
- We inform recipients if we erase any data we have shared with them
- We have appropriate methods in place to erase information

Right to Restrict Processing

- We know how to recognise a request for restriction, and understand when the right applies
- We have a policy in place for how to record requests we receive
- We may refuse a request, and will provide details to individuals when we do so
- We respond to a request for erasure without undue delay, and within 1 month of receipt
- We may extend the time limit to respond to more complex requests
- We have systems in place to indicate that further processing has been restricted
- We have systems in place to inform any recipients if we restrict any data we have shared with them
- We inform individuals before we lift restriction on processing

Right to Object

- We will stop processing personal data upon receiving notification to do so
- If there are legitimate grounds which override the interests, rights and freedoms of the individual, we may refuse
- If the processing is for the establishment, exercise or defence of legal claims, we may refuse
- We inform individuals of their right to object at the point of first communication
- We stop processing data for direct marketing right away, and without charge
- Personal data may be in the interest of a public interest task, and we may not be required to comply
- We offer a way for individuals to object online through our website

Right to Data Portability

- We know how to recognise a request for data portability and we understand when the right applies
- We have a policy for how to record requests we receive verbally
- We understand when we can refuse a request and are aware of the information we need

- to provide to individuals when we do so
- We can transmit personal data in structured, commonly used and machine readable formats
 - We use secure methods to transmit personal data
 - We have processes in place to ensure that we respond to a request for data portability without undue delay and within one month of receipt
 - We are aware of the circumstances when we can extend the time limit to respond to a request

Exercising your Legal Rights

You can exercise your rights at any time by getting in touch with us at the following address. We will process your request without delay and in accordance with GDPR laws.

Get in touch with us by one of the methods detailed below:

LC Education & Training Ltd

245 Walsall Road, Birmingham , England, B42 1TY

Email: lynalver@lceducation.co.uk

Subject Access Requests

As part of the GDPR obligations, you have various rights in relation to the personal data we store about you. We will seek to deal with any requests without undue delay, and in accordance with the requirements of the GDPR and applicable laws.

We may keep a record on file about your communications to us in order to help us to resolve further issues that may arise.

You also have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner's Office. They can be contacted in the following ways:

Phone: 0303 123 1113

Email: casework@ico.org.uk

Post: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You are able to get in touch with us to exercise their legal rights about the personal information that LC Education & Training Ltd stores about them. They can do this in the following way(s):

- By writing to us at our registered address
- By emailing us
- By phoning us
- Other (please state below)

Security

- We take into account the state of the art and costs of implementing security measures
- We review our information security policies and measures at regular intervals
- We make improvements to our security policies wherever necessary
- We understand the requirements of confidentiality, integrity and availability for the personal data we process

Security Measures

LC Education & Training Ltd has implemented adequate security measures to protect personal information from unlawful access, theft, disclosure or loss.

If you suspect a loss, unauthorised access or misuse of your personal information we hold about you, please let us know immediately. Our details can be found on this document.

The following measures have been implemented:

- Data encryption
- Software version updates
- Data integrity and resilience

Data Anonymisation

Data anonymisation is a process where steps are taken to de-identify personal data to make it impossible to connect that data to an individual. LC Education & Training Ltd does not undertake data anonymisation on personal data.

CCTV and Cameras

LC Education & Training Ltd does not store personally-identifiable video or images from CCTV cameras, body cameras, unmanned aerial systems or other systems that capture information of identifiable individuals or information relating to individuals.

Storage

Storage Location

- Emails
- Documents
- Databases
- Paper Files
- Photographic

Data Breaches

Breach Identification

- We have allocated responsibility for managing breaches to a dedicated person or team
- Our staff know how to escalate a security incident to the appropriate person or team
- We document all breaches, even if they don't all need to be reported

Data Breach Procedures

LC Education & Training Ltd has procedures in place to report a breach of data security to the regulator within 72 hours of becoming aware of any breach. We undertake the following procedures:

- Breaches are investigated at the earliest opportunity
- We pass details of the breach to the regulator, including the nature, consequences and mitigations taken to address it
- We may require assistance from data processors
- We notify individuals if there is a significant risk to their rights and freedoms

Accountability

Contracts

LC Education & Training Ltd may work with third-party data processors in order to fulfill our obligations with you, and to communicate with you. By working with third-party data processors we have contracts in place that ensure the requirements of the GDPR privacy regulations will be met, and the rights of individuals protected. We have contracts in place that include the following compulsory details and terms:

- The nature and purpose of the processing
- The type of personal data and categories of data subject
- Our contracts state that nothing relieves the processor of its own direct responsibilities

Documentation

LC Education & Training Ltd is committed to ensuring we maintain accurate records of data processing, data sharing and retention. The ways we achieve this is as follows:

- We process special category (sensitive) or criminal data, and document conditions for processing, lawful basis for processing, and whether we retain and erase personal data
- We conduct regular reviews of the personal data we process, updating documentation accordingly
- We review our policies, procedures, contracts and agreements to address retention, security and data sharing

Our Accountable Practices

New GDPR legislation by the Information Commissioner's Office state that accountability should be high on the list of priorities for organisations. At LC Education & Training Ltd we take accountability seriously, and take responsibility for complying with with GDPR at the highest management levels and throughout our organisation.

- We take responsibility for complying with the GDPR at the highest management and throughout our organisation
- We adopt and implement data protection policies where proportionate
- We take a 'data protection by design' approach, putting data protection measures in place from the outset
- We implement appropriate security measures to protect data
- We record and report personal data breaches to the appropriate authorities

Data Protection Officers

LC Education & Training Ltd are not required by law to appoint a Data Protection Officer (DPO) because we fall outside the scope for processing activities. According to the GDPR, organisations only need to appoint a DPO if they are a public authority, an organisation whose core activities consist of large scale processing of special category data, or are processing large scale, regular and systematic monitoring of individuals.

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Prepared on Tuesday, April 21, 2020

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