

# General Data Protection Regulations



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**This is a living document and will be review annually, to comply with legislation changes or in the event of changes to working practices**



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## Contents

Introduction	4
Lawful Basis	4
Scope	5
General	6
Collection of Data	6
Data Processing	7
Protection of Data	8
Sharing of Data	9
Disclosure of Information	9
Cookies	10
Further Information	10



## Introduction

This policy sets out the basis by GSG TRAINING will collect personal information from all data subjects, how it will be processed and treated by the company.

It also sets out the rules from the General Data Protection Regulations, the Act governing the handling of all data which is lawfully collected, used, stored or disclosed.

There are various ways in which data can be collected from company's stakeholders, visitors, staff and customers; all of these fall within the remit of the GSG TRAINING's Protection Policy.

For the purposes of the Act, the data controller is Gregory Gavin, 64 Firthview Drive, Inverness, IV3 8QE.

Further details can be found on the Information Commissioner website, [www.ICO.org.uk](http://www.ICO.org.uk) under registration reference: ZA338044.

## Lawful Basis

Under the GDPR, a company must have a lawful basis in order to process personal data.

This not new.

It was requirement to satisfy one of the 'conditions for processing' under the Data Protection Act 1998 (the 1998 Act).

However, the GDPR places more emphasis on being accountable for and transparent about your lawful basis for processing.

The lawful basis for processing are outlined in Article 6 of the GDPR:

**Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

**Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**Vital interests:** the processing is necessary to protect someone's life.

**Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's



personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

For GSG TRAINING, collection of information could be claimed under several different section's but we will centre around LEGAL OBLIGATION.

## Scope of this Policy

This policy applies to the collection, processing and disclosure of data by GSG TRAINING. It also applies to the various types of data which will be collected from all data subjects as described below:

- **Information Provided to GSG TRAINING:**

This information may be given by filling out enquiry forms on the GSG TRAINING website, or by correspondence done by phone, email or otherwise.

Such information may include name, address, email address, phone number, financial and credit card information.

It could also be information provided when contact is made with the Staff to report a problem or resolve a query.

Information provided to GSG TRAINING also includes coursework and assessment submissions, which are all personal data, made by learners during the teaching and learning stage of their student journey.

- **Information collected by GSG TRAINING:**

With regard to each visit to the GSG TRAINING website, the following information may be automatically collected.

Technical information which included the IP Address used by the third party to connect the computer to the internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

Information about the visit to the website including the full Uniform Resource Locators (URL) clickstream to, through and from the GSG TRAINING site (including date and time); products viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.



Information from the use of cookies which distinguishes each website user and allows the company to provide users with a good experience when browsing through the GSG TRAINING website and also to make improvements to it.

- **Information received from other sources:**

GSG TRAINING may receive information about visitors if any of the other websites we operate or services we provide are used.

GSG TRAINING works closely with third parties, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and we may receive information from them.

## **General**

Your privacy is important to us.

This policy is intended to give you confidence in the privacy and security of the personal information we obtain from you whether you:

- Attend our courses in person.
- Upload information to our Website
- Download from it
- Visit our Website.

However, please note that we are not responsible for any use of your personal information you provide to third-party websites that may be accessed via this website.

You will therefore need to review the privacy policy of any third-party websites that you use.

## **Collection of Personal Data**

When you use our services, you may be asked for personally identifiable information such as your name, address, date of birth, email address, telephone number.

Cookie information, pages you have requested and your IP address may also be recorded by us and/or third parties from your browser as set out in this policy.

By giving us such information, you will need to consent to our using it in the manner described in this policy.

Under GDPR, you may withdraw your consent at any time by emailing us at [gregory.gavin@gsgtraining.co.uk](mailto:gregory.gavin@gsgtraining.co.uk)



We will return or destroy your personal information within 5 days of receipt of your withdrawal of consent. There may be some information we are required to store as part of our legal obligations, these records will be kept even in the event of consent being withdrawn. You will be notified of any such records.

Intermediaries or anyone acting as an intermediary by submitting someone else's personal information, must ensure that they have obtained the express consent to upload such personal information onto this website for the purposes set out in this Privacy Policy.

The Act gives you the right to access information held about you.

You can obtain access to your personal information held by us by contacting the Data Protection Officer, GSG TRAINING, 64 Firthview Drive, Inverness, IV3 8QE. Please note, there is an administration charge payable on this request.

## **Data Processing**

We will need to process your information to provide the service requests, all data will be processed in line with the following practices.

- GSG TRAINING shall take appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction or damage to, personal data.
- Personal data shall be processed in accordance with the rights of data subjects under this act.
- Personal data collected shall not be transferred to a country or territory outside of the European Economic area unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.
- Personal data or information collected through any of the ways described above shall be processed fairly and lawfully. The data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are collected or processed.
- Personal data shall be accurate and where necessary kept up to date.
- Personal data processed for any purpose or purposes shall not be kept longer than is necessary for that purpose or those purposes.



- Coursework and assessment submissions – Course works and assessment submissions made to GSG TRAINING during the teaching and learning stage of the learner’s journey will only be shared securely based on the terms of agreement, with the approved stakeholders such as a designated person or department in the applicable Awarding Organisation.

We may also process your information to provide access to privileged areas of the Website, to administer contests and competitions, personalise your visit to our site and to enable us to review, develop and improve the products, services, and special offers we provide online.

We may occasionally carry out market research and send you details of services and offers that we think will be of interest to you. If you do not wish to receive such information, please ensure you e-mail [gregory.gavin@gsgtraining.co.uk](mailto:gregory.gavin@gsgtraining.co.uk) or alternatively when we send you an e-mail, it will contain a provision to allow you to opt out of receiving any further information from us.

## **Data Protection**

By submitting their personal data, all data subjects and other stakeholders agree to the transfer, storing or processing of their personal information. GSG TRAINING will take all steps reasonably necessary to ensure that all data is treated securely and in accordance with this policy.

All information provided to us is stored on our secure servers.

Any payment transactions will be encrypted using SSL technology and where a password has been chosen to access certain parts of our sites, all data subjects and external stakeholders are responsible for keeping chosen passwords confidential. Passwords must not be shared with anyone.

The transmission of information via the internet is not completely secure and although all due diligence will be carried out to protect all personal data, we are unable to guarantee the security of any data transmitted to our sites and any transmission is done at the risk of the data subjects or stakeholders.

Once data and other information is received by GSG TRAINING, strict procedures and security features will be used to try to prevent unauthorised access.





## Data Sharing

Information held about visitors to our website and our learners or other external stakeholders will be used in the following ways:

- to carry out our obligations arising from any contracts entered into between data subjects and GSG TRAINING, to provide them with the information, products and services that is requested from us. This includes the dissemination of exam, coursework or other assessment results and certificates of completion;
- to provide data subjects with information about other goods and services we offer that are similar to those that they have already purchased or enquired about;
- to provide data subjects, or permit selected third parties to provide them with information about goods or services we feel may interest them.

If a data subject is an existing customer, we will only contact them by electronic means with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to them.

Data subjects who do not wish for their data to be used in this way or passed on to third parties for marketing purposes must tick the relevant box in the forms used to collect the relevant data.

- to notify all data subjects about changes to our service.
- to ensure that content from our site is presented in the most effective manner for data subjects and their computers.

## Disclosure of Information

Personal information, including coursework and assessment submissions from data subjects will be shared with GSG TRAINING staff including course tutors, assessors and members of the internal quality assurance team.

We may also share information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or data subjects. Business partners also includes the various Awarding Organisations we work with.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to data subjects and others.



GSG TRAINING will not disclose information about identifiable individuals to our advertisers, but they might be provided with aggregate information about our users.

Such aggregate information may also be used to help advertisers.

We may also use such aggregate information to help advertisers reach the kind of audience they want to target.

We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

## **Cookies**

We may create and access cookies (a piece of information which is stored on your computer and allows us to identify if you have visited the site before) on your PC.

Third party advertisers may also create and access cookies, which will be subject to their privacy policies - we accept no responsibility or liability for the use of such third parties' cookies.

If you do not wish cookies to be placed on your PC, then they can be disabled in your web browser.

The option to do so is normally found in your browser's "security settings" section.

However, please note, permanently disabling cookies in your browser may hinder your use of our website as well as other websites and interactive services.

## **Further Information**

For further information on this policy or for questions on GSG TRAINING, please contact [gregory.gavin@gsgtraining.co.uk](mailto:gregory.gavin@gsgtraining.co.uk)