



## Cumbria Training Services

### Privacy Policy

Effective Date: 01/04/18

Reviewed: 01/12/20

Cumbria Training Service provide training and consultancy services to private and commercial clients. This Privacy Notice provides a framework of understanding about the personal data that is collected by Cumbria Training Services (as applicable, hereinafter each separately and/or jointly called the "Data Controller"). Personal data collected by the Data Controller will be controlled and processed in accordance with the terms of this Privacy Notice.

This Privacy Notice describes the types of personal data or personal information we collect, how we use the information, how we process and protect the information we collect, for how long we store it, with whom we share it, to whom we transfer it and the rights that individuals can exercise regarding our use of their personal data. We also describe how you can contact us about our privacy practices and to exercise your rights. In general, our privacy practices conform with law and regulation, including where applicable the provisions of the European Union's General Data Protection Regulation (GDPR).

### Information We Collect

We may collect personal data about you in a variety of ways, such as through our website and social media channels; at events; through phone; through enquiries by email in connection with our interactions with clients. We may collect a selection of personal data dependant on the nature of the relationship, including, but not limited to:

- contact information (such as name, postal address, email address and telephone number);
- payment details (bank details, address);
- contact history, personal correspondence;
- feedback;
- purchase history;
- information you provide about contacts, colleagues, clients or other people you would like us to contact (The Controller assumes that the other person previously gave an authorisation for such communication); and
- other information you may provide to us, such as in surveys or through the "Contact Us" feature on our Sites.

In addition, if you are an associate or providing services on behalf of our company, we may collect the following types of personal data:

- employment and education history;
- language proficiencies and other work-related skills;
- information provided by references; and
- information contained in your resume or C.V., information you provide regarding your career interests, and other information about your qualifications for employment.

In addition, we may collect information you provide to us about other individuals, such as information related to emergency contacts.



## How We Use the Information We Collect

The Data Controller collects and uses the data gathered for the following purposes:

- providing training services;
- creating company policies and procedures;
- setting up business and system processes;
- creating and managing online accounts;
- processing payments;
- managing our business partner and client relationships;
- where permitted under law and consistent with this Privacy Notice, to send promotional materials, alerts regarding available services and other communications;
- where permitted under law, for communicating about, and administering participation in, special events, promotions, programs, offers, surveys, contests and market research;
- responding to individuals' inquiries and claims;
- operating, evaluating and improving our business (including developing, enhancing, analysing and improving our services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- protecting against, identifying and seeking to prevent fraud and other unlawful activity, claims and other liabilities; and
- complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies.

All processing will be carried out based on adequate legal grounds which may fall into several categories, including:

- consent or explicit consent from the data subject, where required by applicable law;
- to ensure that we comply with a statutory or contractual requirement, or a requirement necessary to enter into a contract or
- it is essential and necessary for the legitimate interest of the Data Controller, as described in more detail below (e.g. allowing access to a website in order to provide the services offered).

We also may use the information in other ways for which we provide specific notice at or prior to the time of collection.

## Use of Automated Data Collection Methods

When you visit our website, we may collect certain information by automated means, such as cookies, web beacons and web server log. The information we may collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on the site, dates and times of visits to our site and other usage statistics.

A "**cookie**" is a file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser.

A "**web beacon**" also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and is used to transmit information collected through cookies back to a web server.

Through these automated collection methods, we may obtain "**clickstream data**," which is a log of the links and other content on which a visitor clicks while browsing a website.



## How We Collect Information by Automated Means

As you click through our website, a record of the action may be collected and stored. We link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you to let us know, for example, whether you have opened an email we sent to you. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Your browser will allow you to block cookies, however, you may not be able to use all the features of our Sites without cookies.

Providers of third-party apps, tools, widgets and plug-ins on our website, such as social media sharing tools, also may use automated means to collect information regarding your interactions with these features. This information is collected directly by the providers of the features and is subject to the privacy policies or notices of these providers. Cumbria Training Services is not responsible for these providers' information practices.

To the extent required by applicable law, we will obtain your consent before collecting information using cookies or similar automated means.

## How We Use Information Collected through Automated Means

We use information collected through cookies, web beacons, pixels, web server logs and other automated means for purposes such as;

- customising our users' use of our website;
- delivering content tailored to our users' interests and the way our users use our website;
- and
- managing our website and other aspects of our business.

## Links to Third-Party Sites, Apps and Services

For your convenience and information, our website may provide links to third-party sites, apps and services that may be operated by companies not affiliated with us. These companies may have their own privacy notices or policies, which we strongly suggest you review. We are not responsible for the privacy practices of any non-Cumbria Training Services sites, apps or services.

## Legitimate Interest

The Data Controller may process personal data for certain legitimate business purposes, which includes some or all of the following:

- where the process enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our clients, candidates and associates;
- to identify and prevent fraud;
- to enhance security of our network and information systems;
- to better understand how people, interact with our websites;
- for direct marketing purposes;
- to provide postal communications to you which we think will be of interest to you; and
- to determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes, we will ensure that we keep your rights in high regard and take account of these rights. You have the right to object to such processing and may do so by contacting us as described below. Please bear in mind that if you exercise your right to object, this may affect our ability to carry out and deliver services to you for your benefit.



## How We Process and Protect Personal Information

We process the personal data we collect, also by automated means, for the purposes defined above and for a specific period, which complies with our internal retention policy, in order to ensure that the personal data are not kept longer than necessary.

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. In order to ensure adequate security and confidentiality of the personal data, we may apply the following security measures as appropriate:

- Encryption of data in transit;
- Strong user authentication controls;
- Hardened network infrastructure; and
- Network monitoring solutions.

## How Long We Store Data We Collect

We store in our systems the personal data we collect in a way that allows the identification of the data subjects for no longer than it is necessary in light of the purposes for which the data was collected, or for which that data is further processed.

We determine this specific period by considering:

- The necessity to retain the personal data collected, in order to offer services established with the user;
- The legitimate interest of the Data Controller, as described in the purposes above; and
- The existence of specific legal obligations that make the processing and related storage necessary for specific period of times. (i.e. HMRC records will be stored for 7 years).

## Information We Share

We do not disclose personal data that we collect about you, except as described in this Privacy Notice or in separate notices provided in connection with activities. We may share personal data with vendors who perform services on our behalf based on our instructions. We do not authorize these vendors to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

In addition, we may disclose personal data about you (i) if we are required to do so by law or legal process; (ii) to law enforcement authorities or other government officials based on a lawful disclosure request; and (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal data we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation).



## Data Transfers

We also may transfer the personal data we collect about you to countries outside of the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the personal data. When we transfer your information to other countries, we will protect that data as described in this Privacy Notice and such transfers will be in compliance with applicable law.

The countries to which we may transfer the personal data we collect about you may be:

- Within the European Union
- Outside the European Union

When we transfer personal data from within the European Union to countries or international organisations that are based outside the European Union the transfer takes place based on: -

- An adequacy decision by the European Commission; or
- In the absence of an adequacy decision, other legally permitted grounds: (a) a legally binding and enforceable instrument between public authorities or bodies; (b) binding corporate rules; or (c) standard data protection clauses (formerly called the Model Clauses) promulgated by the Commission.

## Your Rights as a Data Subject

When authorised by applicable law, a data subject may exercise certain specific rights, such as:

- *Right of access:* A data subject may access his or her personal data in order to verify that his or her personal data is processed in accordance with law.
- *Right to rectification:* A data subject may request the rectification of any inaccurate or incomplete data held about him or her, in order to protect the accuracy of such information and to adapt it to the data processing.
- *Right to erasure:* A data subject may request that the Data Controller erases information about him or her and to no longer process that data.
- *Right to restriction of processing:* A data subject may request that the Data Controller restricts the processing of his or her data.
- *Right to data portability:* A data subject may request data portability, meaning that the data subject can receive the originally provided personal data in a structured and commonly used format or that the data subject can request the transfer of the data to another data controller.
- *Right to object:* A data subject who provide a Data Controller with personal data may object, at any time, to the data processing on several grounds as set out under GDPR without needing to justify his or her decision.
- *Right not to be subject of automated individual decision-making:* A data subject may request not to be subject to a decision based solely on automated processing, including profiling, if such profiling produces a legal effect concerning the data subject or similarly significantly affects him or her.
- *Right to lodge a complaint with a supervisory authority:* Every data subject has the right to lodge a complaint with an applicable supervisory authority; in particular in the EU Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR.

Whenever data processing is based on consent as described under Article 7 of the GDPR, the data subject may withdraw his or her consent at any time. If you require more information about the processing of your personal data, please refer to the How to Contact Us section below.



## Updates to Our Privacy Notice

This Privacy Notice may be updated periodically to reflect changes in our privacy practices and legal updates. For significant changes, we will notify you by posting a prominent notice on our website indicating at the top of each notice when it was most recently updated.

## How to Contact Us

If you have any questions or comments about this Privacy Notice, or if you would like to exercise your rights, please write to:

Cumbria Training Services  
1 Beech Grove  
Abbeytown  
Cumbria  
CA7 4TR

Alternatively, you can contact our data contact directly on 07889603850 or [justine@cumbriatrainingsservices.co.uk](mailto:justine@cumbriatrainingsservices.co.uk)