



PRIVACY POLICY - CUSTOMERS

PHR 1.05, Rev 4, Date: 1/6/24

PURPOSE

Raeburn Training is committed to protecting our customers (and those engaged with the customer) personal data. This policy contains important information about what personal data we collect and why, how we use/store/protect data and, when required, how we share data with third parties. It also contains information on customers rights in relation to their data.

COLLECTING DATA

Why we collect data

The Company takes privacy seriously and will only ever collect data which is personal to customers where it is necessary, fair and lawful to do so. We will only collect and use information where:

- It is necessary as part of your engagement with Raeburn Training
- You have given consent, when required by the business
- There is a legitimate interest for the purpose of a third-party service such as awarding bodies
- The Company must demonstrate legal compliance in areas such as equality and diversity

What data is collected

- Information about customers and candidates: name, date of birth, address, national insurance number, photographs, emergency contact details etc
- Information connected to your engagement with Raeburn Training: training scheme details, training records, licence details
- Information through communications: text, calls, e-mails, letters, meetings
- Information classified as sensitive personal data: health, marital status, ethnicity, religion etc

How data is collected

All personal data is obtained directly from the customer through various methods throughout their engagement with the company. This can include via telephone, e-mail, completion of forms, attendance at training, texts, CCTV, photography etc.

STORAGE, SECURITY AND USAGE

The data we collect from customers is stored in various locations for different purposes throughout the engagement and, on occasion, afterwards. These locations are typically accessible by company management and instructors depending on the process being executed and include:

LOCATION	SECURITY	PURPOSE
Company mobiles	Password protected	Communication
Company e-mail	Password protected Two-factor authentication	Communication, marketing (opt in required)
Cloud based system	Password protected	CCTV records
Company SharePoint & Laptops	Anti-virus Password protected Two-factor authentication Backup software	Storage and processing of data



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Third party systems	Password protected	CITB, NPORS, SQA etc awarding body verification of training
Hard copy files	Lockable cabinets	Booking forms, pre-assessment questionnaires, training records, invoices.

In addition to the above security measures, all employees involved in data collecting and processing will undertake annual training. Their systems and processes are also subject to regular audit to ensure continual compliance.

The Company prohibits the transfer of data from a Company device to a personal device.

Breaches of these guidelines will be treated as gross misconduct and investigated and actioned through our disciplinary policy.

SHARING

The Company will only share your data with a third party when necessary to meet a contractual or legal obligation. Providers we typically share information with are in relation to the following processes:

- Awarding bodies
- Associate and Third Party Instructors: those who undertake training on behalf of Raeburn Training will be given access to basic information regarding customers and candidates for them to conduct training effectively and in line with the relevant awarding body.
- Social Media and Website (opt in required): promotion of past training events, testimonials etc.

Information will be sent to SQA for data entering purposes for qualifications, certifications and maintenance of record of attainments. SQA's Privacy statement can be viewed via this link to see how information is collected and used. <https://www.sqa.org.uk/sqa/36588.html>

DATA RETENTION

We will only keep personal information where it is necessary to fulfil our obligation to the customer during the engagement and in line with awarding body procedures.

Refer to the [linked](#) grid for SQA specific retention requirements.

AUDITING

To ensure continued compliance, regular audits will be conducted in line with our Workplace Monitoring Policy, with all employees involved in collecting and processing data required to fully participate and co-operate.

Any breaches found will be rectified immediately and reported through the necessary channels within the relevant timescales.



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YOUR RIGHTS

Customers have several legal rights to control what the Company does with their information. This includes the right to:

- Access personal information
- Request that personal information is rectified
- Request erasure if there is not a compelling reason for the Company to have it
- Restrict processing for certain reasons where, again, there is not a compelling reason for the Company to do so
- Data portability so to use your own data across different services
- Object to data processing in relation to any marketing, interest of the company or research purposes
- Question automated decision making

In order for the Company to process data access requests effectively, the customer should complete the Data Request Form, however, this is not compulsory, and the customer may choose to use another written means to make the request.

An administration fee of £10.00 will apply for each request received.

HOW TO COMPLAIN

The Company will always strive to collect, use and safeguard our customers personal information in line with data protection laws. If you do not believe the Company has handled information as set out in our Privacy Policy, please contact Director in the first instance who will aim to resolve the matter.

If the customer still feels dissatisfied, they can complain to the Information Commission Office.