

ETD DATA PROTECTION AND PRIVACY POLICY

Introduction

In order to operate as a business entity, ETD Ltd collects, maintains and uses certain personal information about current, past and prospective employees, customers, suppliers, candidates, and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the Data Protection Act 2018 (DPA) (formerly DPA (1998)), and the General Data Protection Regulations 2018 (GDPR).

ETD Ltd is committed to the eight principles of data protection as detailed in the DPA. and the rules as set out in the GDPR. Personal data must:

- be fairly and lawfully processed and not processed unless specific conditions are met;
- be obtained for one or more specified, lawful purposes and not processed in any manner incompatible with those purposes;
- be adequate, relevant and not excessive for those purposes;
- be accurate and, where necessary, kept up to date;
- not be kept for longer than is necessary;
- be processed in accordance with the data subject's rights under the DPA / GDPR;
- be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage;
- not be transferred to countries outside the European Economic Area (EEA) unless the country or territory ensures adequate protection for the rights and freedoms of the data subjects.

To comply with the data protection principles, ETD Ltd will:

- register with the ICO to ensure compliance with legal requirements
- observe fully all conditions regarding the fair collection and use of personal information;
- meet its legal obligations to specify the purpose for which information is used;
- collect and process appropriate personal information only to the extent that it is needed to fulfil operational needs or to comply with legal obligations;
- ensure the quality of the personal information used;
- apply strict checks to determine the length of time personal information is held;
- ensure that individuals about whom information is held are able to exercise their rights under the DPA, including the right to be informed that processing is taking place, the right of access to their own personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase incorrect information;
- take appropriate technical and organisational security measures to safeguard personal information; and
- ensure that personal information is not transferred outside the EEA without suitable safeguards.

Overall responsibility for ensuring that the Company complies with its data protection obligations rests with the Managing Director. It is the responsibility of all employees to ensure that personal information provided to the Company, for example current address, is accurate and up to date. To this end employees are required to inform the Company immediately when changes occur.

CONSIDERATION --- PARTICIPATION --- LEARNING --- DISTINCTION



ETD DATA PROTECTION AND PRIVACY POLICY

Employees whose role involves the collection, maintenance and processing of personal information about other employees, customers, suppliers or any other individuals with whom the Company has dealings are responsible for following the Company's rules on good data protection practice as notified from time to time by their Line Manager.

ETD Ltd holds the following personal information about its employees:

- Name, Address, Telephone number, Bank Details
- Birth date, National Insurance Number

This information is used for payroll and administrative purposes.

We also hold the following sensitive personal information about employees and candidates. This helps the trainer do a good job in terms of training, and is provided by our candidates on a voluntary basis. It can be removed at any time at the request of the candidate:

- Ethnic Background and Gender
- Health Information
- Dyslexia and other learning difficulties and disabilities / Academic preferences for reading and writing / learning styles and preferences / other key motivators to encourage learning (these are used as part of the learning experience to deliver training).

This information is used for the purpose of equal opportunities monitoring, health and safety monitoring, and the monitoring and improvement of delivery and the training experience. It is designed to enable us to precisely target candidate learning.

ETD Ltd holds the following personal information about its course delegates. These are required to comply with Network Rail's rules for clearly identifying and verifying the identity of individuals prior to training. This is kept for a period under secure storage under the requirements to keep all records secure for a period after training.

- Name, Telephone number, Date of Birth, National Insurance Number
- Company Details, Contact Details
- Photocopies of ID's including Passport / Drivers Licences

Anyone who is the subject of personal information held by the Company has the right to make a subject access request. Employees who wish to exercise this right should write to the Office Manager. If, as the result of a subject access request, any personal information is found to be incorrect it will be amended. The Company will deal promptly with subject access requests and will normally respond within 40 days. If there is a reason for delay, the person making the request will be informed accordingly.

CONSIDERATION --- PARTICIPATION --- LEARNING --- DISTINCTION

