



Data Protection Policy

INTRODUCTION

We are a leading, high-quality, management training provider for educational establishments and our mission is to equip your leaders and managers with the strategies, tools, and skills that enable them to create a positive and productive team culture that puts rewarding learner experiences at its heart.

Applies to

This policy applies to all the processing of personal data carried out by The Managers Training Company (TMTC) including processing carried out by our associates and data processors. We collect and use personal information and this policy applies to the personal information of:

- Learners, service users, customers
- Managers of any of the above
- Suppliers

Reason for the policy

To ensure TMTC comply with its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18).

Please note that the following inter-changeable terms, are used throughout this document:

- Personal data and personally identifiable information
- Data subject and individual
- Regulator and Information Commissioners Office – ICO

POLICY

This policy sets out how TMTC will comply with our data protection obligations and seek to protect personally identifiable information. Its purpose is to ensure that staff understand and comply with the rules governing the collection, use and deletion of personal information, to which they have access to in the course of their work.

The policy does not form part of the formal contract of employment, but it is a condition of engagement that associates abide by the rules and policies. Any failures to follow the policy can therefore result in disciplinary action.

The CEO is responsible for data protection compliance within TMTC. If you have any questions or comments about the content of this policy or if you need further information, you should contact: tracy-anne@themanagerstrainingcompany.co.uk or 01622 232000.

We regard the lawful and correct treatment of personal information as very important to our successful operations and to maintaining confidence between TMTC and those with who it carries out business. We will ensure that we treat personal information lawfully and correctly.

Personal information will be handled and dealt with properly however it is collected, recorded, and used, and whether it be on paper, in computer records or recorded by any other means.

As part of our commitment to data protection, we will review and update this policy regularly in accordance with our data protection obligations. We may amend, update, or supplement it from time to time. We will publish any new or modified policy on our website, when it is adopted.

Sensitive Personal Information

The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person. Some personal data is more sensitive and is afforded more protection, this is information related to:

1. Race or ethnic origin
2. Political opinions
3. Religious or philosophical beliefs
4. Trade union membership
5. Genetic data
6. Biometric ID data
7. Health data
8. Sexual life and/or sexual orientation
9. Criminal data (convictions and/or offences)

Before processing any sensitive personal information, staff must notify the CEO of the proposed processing, in order that the CEO may assess whether the processing complies with the criteria noted above.

Sensitive personal information will not be processed until:

1. The individual has been properly informed (by the way of a privacy notice) of the nature of the processing, the purposes for which it is being carried out and the legal basis for it.

Privacy Notice

TMTC will publish privacy notices from time to time, informing you about the personal information that we collect and hold relating to you, how you can expect your personal information to be used and for what purposes.

We will take appropriate measures to provide information in privacy notices in a concise, transparent, intelligible, and easily accessible format, using clear and plain language and our full notices is currently on our website.

We take your privacy very seriously and would request you read this privacy policy carefully as it contains important information on who we are and how and why we collect, store and use your personal data. It also explains your rights in relation to your personal data and how to contact us in the event you have a complaint.

Individual Rights

You have the following rights in relation to your personal information:

- To be informed about how, why and on what basis that information is processed.
- To obtain confirmation that your information is being processed and to obtain access to it by making a subject access request using the attached Subject Access Request template

- To have data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing (this is sometimes known as ‘the right to be forgotten’).
- To restrict the processing of personal information where the accuracy of the information is contested, or the processing is unlawful (but you do not want the data to be erased).

If you wish to exercise any of the rights above, please complete a Subject Access Request form and fill in the relevant section/s.

Information Security

TMTC will use appropriate technical and business measures to keep personal information secure, and to protect against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

Storage and Retention of Personal Information

Personal information (and sensitive personal information) will not be retained for any longer than necessary. The length of time over which data should be retained will depend upon the circumstances, including the reasons why the personal information was obtained.

Disposing of Data

Hard copy data will be disposed of through confidential shredding using an external contractor.

Where computer equipment is disposed of, all data shall be removed and storage media such as hard disks, Tablets, iPads, and USB memory sticks will be “electronically” shredded or a similar procedure to ensure that data can’t be “reclaimed”.

Data Breaches

TMTC takes every care in protecting the personal information it holds and avoiding risks which could lead to a compromise of security and a potential data protection breach.

Training

TMTC will ensure that staff are adequately trained regarding their data protection responsibilities. Individuals whose roles require regular access to personal information, or who are responsible for implementing this policy or responding to subject access requests, will receive additional training to help them understand their duties and how to comply with them.



Subject Access Request

You can obtain copies of information held by TMTC via a subject access request (SAR).

A SAR need not be in a specific format, but should be clear and state what information is required. It should also only be used for data relating to you as an individual.

Data can be withheld for limited reasons including:

- if your request is 'manifestly unfounded or excessive', which means that you have asked for a very unreasonable amount of data
- if it includes personal information about someone else (third party information)

If data is withheld, we will tell you the reason why and how to challenge that decision.

We will acknowledge your request within 5 working days. We aim to provide the requested data within a maximum of 30 working days.

Please note that data will be password protected and emailed to the email address provided. A charge will be payable if you require hard copies, which will be sent by signed for via Royal Mail.

The attached template can be used or adjusted to suit each individual's circumstances when requesting personal data.



Subject Access Request

Title:	Forename:	
Surname:		
Date of Birth:		
Phone number:	Mobile number:	
Address:		
Postcode:		
Email:		
Please supply the following information under the Data protection Act 2018 relating to:	Required Yes/No	Dates To/From
All and any written files and documentation relating to me by TMTC		
All and any correspondence that relates to me between TMTC any other organisation or individual		
All and any electronic communications by email, text or other means, which relate to me		
All and any memoranda and notes of telephone communications or discussions that relate to me		
All and any data which relates to me not specifically described above		

In order to assist us, please provide a copy of your passport or driving licence, as proof of your identity.

Signed.....

Date.....