



Data Privacy Policy

West Berks and Oxon Training Group

West Berks and Oxon Training Group (WBOT) Privacy Information Notice for Members, Trainees, Instructors, Suppliers and Business Contacts

Policy Statement

WBOT is committed to protecting and respecting the privacy of all of our clients. This Policy adopted by WBOT explains when and why personal information is collected, how it is used, the conditions under which it may be disclosed to others and how it is stored.

This policy relates to all data collected throughout all business activities and has been adopted in compliance with the EU General Data Protection Regulations (GDPR). WBOT is responsible for deciding how we hold and use personal information about you and explaining it clearly to you.

This notice applies to prospective, existing and former customers of WBOT; individual and business contacts; individuals who request information from us; any person who provides services to WBOT, either as an individual or as the employee or representative of a corporate service provider; and third parties acting for our customers.

WBOT reserve the right to update this notice at any time. Should any substantial updates be made, we will notify you. We may also notify you in other ways from time to time about the processing of your personal information. Any questions regarding this Policy and our privacy practices should be sent by email to the office – office@wbotraining.co.uk

Who are WBOT?

West Berks and Oxon Training is an independent, Lantra registered, non-profit making organisation and is committed to building on its strength of delivering cost effective and high quality training to members and non-members alike. WBOT offer a broad range of management, vocational and legislative training relevant to all rural businesses. Courses are held at our own venue in Woolley near Wantage and are run on demand.

How do we collect information?

WBOT collects personal information direct from members, trainees, instructors, suppliers and business contacts upon enquiry about our services and throughout the arrangement. The method of collecting information would depend on the nature of the enquiry and the route that the query has taken.

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What information is collected and how is it used?

Personal data, or personal information, means any information about an individual from which that person can be identified. WBOT will collect different information depending on the type of arrangement. Typical information collected, processed and stored on file could be:

- Personal information provided by members, trainees, instructors, suppliers and business contacts including name, business name (where applicable) address, date of birth (where applicable), photographs, (where applicable), telephone numbers and email addresses
- Bank details may also be supplied should WBOT need to pay instructors, suppliers or contractors for goods or services
- WBOT may perform verification of identity (including checking and evidencing photographic identification and proof of address). We do this to comply with awarding body's legal obligations
- Correspondence relating to members, trainees, instructors, suppliers and business contacts
- We process any feedback received from members, trainees, instructors, suppliers and business contacts to help to improve our services

Sensitive data

WBOT does not currently gather sensitive personal data (e.g. health, genetic, biometric data; racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, and criminal convictions) within day to day business.

Children's information

WBOT's training courses are not available to children under the age of 13.

Our lawful basis for using personal information

WBOT will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to act on the arrangements we have entered into with you
- Where it is necessary for legitimate interests, for example Accountants, Agents (Insurance), Bankers, Solicitors
- Where we need to comply with a legal obligation
- Otherwise, with your prior consent

WBOT will only use your personal information for the purposes for which it was collected, as already outlined, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for any unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Third Parties

WBOT will not sell or rent information to third parties and will not share any information with third parties for marketing purposes. WBOT disclose only the personal information that is necessary to deliver any training related service. WBOT uses a number of third party companies to assist with fulfilling training course obligations. Any third-party service providers are required to take appropriate security measures to protect your personal information in line with our policy.

WBOT do not allow third-party providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with the relevant training course needs.

General Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Data Sharing

WBOT share personal information where required by law and in order to fulfil training requirements, with the following third parties:

- HMRC or other government or law enforcement agencies
- Insurers, bank, accountant
- Instructors, certification bodies

Where we share information with others they are responsible to you for their use of your information and compliance with the law.

Controlling information

You have rights concerning the information held under the GDPR. Should you wish to exercise these rights, please contact WBOT's office.

Requests for copies of information held

Upon request, WBOT will provide a statement regarding the personal data held in relation to an individual or business. Any requests should be made in writing addressed to WBOT's office.

Updating or correcting information held

The accuracy of personal information held is important to WBOT. Please keep us informed if your personal information changes during the course of our arrangements with you.

Deleting personal data

You have the right to request erasure of personal information. Unless there is a compelling reason for the data not to be erased (for example, WBOT maybe required to keep personal data to fulfil contractual or legal obligations), personal data will be deleted upon request.

Challenging Legitimate Interests

Under certain circumstances, you have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

Restrict Processing

Under certain circumstances, you have the right to request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request a data transfer

Under certain circumstances; you have the right to request the transfer of your personal information to another party.

Withdraw Consent

Under certain circumstances, you have the right to withdraw consent in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you.

Automatic decision making

WBOT do not use any personal information for automated decision making or profiling.

Security

WBOT takes data security seriously. In order to protect all personal data from loss, misuse or unauthorised access or disclosure we have put in place methods to safeguard and secure information collected. These steps include:

- Data minimisation
- Password best practice
- Security best practice concerning devices (PCs, laptops, mobile devices), online accounts, website hosting, physical access and storage
- training and accountability on data protection

Data Breaches

WBOT's Data Protection Policy includes a clear process for handling a personal data breach, should one occur. Any data breaches that are discovered externally should be reported to the office immediately. Where appropriate, WBOT will promptly notify anyone should any unauthorised access to their personal information have taken place and ICO if relevant.

Complaints

Should anyone wish to make a complaint regarding personal information held, matters should be raised with WBOT's office in the first instance. Should the response not be satisfactory, or if there are suspicions that WBOT is not processing a person's information in accordance with the law, complaints are to be made to the Information Commissioners' Office (ICO).