

# TRAC TRAINING PRIVACY NOTICE



## About Us

In this Notice:

'TRAC', 'we', 'us', 'our' etc. means TRAC Training Ltd.

'You' means candidate undertaking training delivered by TRAC.

We are what is known as the 'Controller' of personal information that we gather and use. 'Personal Information' means information about you and from which you could be identified.

TRAC are committed to collecting and using data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR). We will ensure that we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful processing of personal data and against accidental loss or destruction of personal data.

Our Fair Processing and Privacy Notice outlines our purposes in using your information and outlines your rights. In particular we will:

- Process your information fairly and lawfully,
- Maintain adequate security and safeguards during processing,
- Ensure the safe and secure disposal when finished.

It also explains your privacy rights.

You can get in touch with our Data Protection Team via:

**Email** - [GDPRteam@trac.com](mailto:GDPRteam@trac.com)

**Post** - TRAC Group GDPR Team  
c/o TRAC International  
3 Thistle Road  
Dyce, Aberdeen  
AB21 0NN

## Definitions

- **Breach** – loss of information (e.g. from targeted hacker or physically losing files).
- **Consent** - freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data.
- **Data Controller** - owner/user of gathered personal data - the entity that determines the purposes, conditions and means of the processing of personal data.
- **Data Erasure** - also known as the Right to be Forgotten, it entitles the data subject to have the data controller erase his/her personal data, cease further dissemination of the data, and potentially have third parties cease processing of the data.
- **Data Processor** - the entity that processes data on behalf of the Data Controller.
- **Data Subject** - an individual - a natural person whose personal data is processed by a controller or processor.
- **Personal Information** - information that directly and clearly identifies an individual or can be used in combination with other information to identify an individual.
- **Privacy Impact Assessment** - a tool used to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data.
- **Sensitive Personal Information** - a subset of personal information that may be more sensitive to the individual (e.g. relating to racial or ethnic origin, political opinions, religious beliefs, health, sex life, criminal convictions). Personal data concerning disability is sensitive data.
- **Subject Access Right** - also known as the Right to Access, it entitles the data subject to have access to and information about the personal data that a controller has concerning them.

<https://www.eugdpr.org/glossary-of-terms.html>

# TRAC TRAINING PRIVACY NOTICE



## Changes to our Fair Processing and Privacy Notice

Our notice will be updated from time to time. We will ensure that the most current version is available on our website and to you at point of booking/attending one of our courses.

### What information do we collect about you?

We need to keep and process information about you as part of our training service. We hold and process both personal data and sensitive personal data about our candidates and persons associated with them (e.g. persons from their employer booking on their behalf).

This information is used to:

- Administer our training and contractual relationships with you (e.g. process payment);
- Run our business/pursue legitimate business interests;
- Comply with our legal and other compliance obligations.

Information we collect and process includes, but is not limited to:

INFORMATION TYPES	EXAMPLES (N.B. - LIST NOT EXHAUSTIVE)
About You	Name, address, telephone number, date of birth, email, emergency contacts, details of any disabilities, restrictions and/or required accommodations.
Identification	Passport, driver licence, Sentinel card, other photographic ID.
Suitability to work	Competencies, declaration of fitness where applicable.
Payment processing	Card details.
Captured on our security systems/IT systems	CCTV.

We are also required by certain certifying bodies of the courses we provide to conduct diversity monitoring. Where this is done, it will not identify you as an individual and has no bearing on your training.

### How do we collect information about you?

Much of the information we hold about you will have been provided by you prior to course commencement or throughout the training event.

However, on some occasions this information will have been provided by external sources, e.g.:

- Your employer if they are booking a course on your behalf;
- From the certifying/administering body of course you are undertaking (e.g. IRATA, Sentinel).

We do not use automated decision-making or profiling to:

- Administer our training or contractual relationship with you;
- Run our business/pursue legitimate business interests.

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## How will we use course payment information?

TRAC process personal data as necessary to:

- Administer your training with us - e.g. to process your payment, issue certificates etc.,
- Ensure the legitimate interest(s) of us as a company,
- Comply with legal and other compliance obligations.

## Monitoring

We are required by certain certifying bodies of the courses we provide, to conduct diversity monitoring. This is done for equality purposes and will be treated with utmost confidentiality. This data will only be used for general statistical and monitoring purposes and has no bearing on your training. The data is anonymous and will not identify you as an individual.

TRAC reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. Monitoring activities include:

- The use of CCTV cameras in and around our premises;
- Auditing our activities to ensure compliance with regulatory and other compliance obligations;
- The use of IT services and ensure network and information security (including bandwidth use);
- Testing and maintaining our systems and to ensure robust performance;
- Access to premises.

Monitoring activities may result in the collection of personal information about you.

## Promotional photographs/videos

During your training, photographs/videos may be taken for use on TRAC social media or promotional material. You will be asked to formally consent to your image(s) being used in this way.

Access to data held by TRAC is restricted to only those that require access to process in line with this privacy notice.

## Support

Where you disclose any learning difficulties (e.g. dyslexia) or any other special needs, discreet solutions will be implemented at the time of training.

## Sharing your information

We will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you. For example, it is likely that we need to notify:

- Certifying body of the training provided of your results;
- Your employer that you have attended a course and your results.

We may also have to contact certifying bodies (e.g. IRATA, Sentinel etc.) should there be any issues with registering you on a course, logging an event etc.

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## External Disclosures

Sometimes we will pass information about you to third parties, where the law allows it. For example, we use third party suppliers and service providers for a number of activities required to administer our business functions (e.g. IT systems, Specialist Trainers/Assessors etc.).

It is in our legitimate interest to use third party suppliers to maintain cost effective/efficient operations and to provide specialist advice/services. Where we use third party and service providers, we only disclose to them any personal information that is necessary for them to provide their service. We ensure relevant contracts are in place to require them to keep your information secure and not to use it other than in accordance with our specific instructions.

## International Transfers

Generally, information you provide to us is stored on our secure servers, or on our cloud based system(s) which are located within the European Economic Area (EEA). It is unlikely that this information will be stored outside the EEA.

We do not sell your information to other organisations.

## How do we protect your information?

We take our duty to protect your personal information seriously and are committed to taking all reasonable measures to ensure the appropriate technical and organisational measures are in place to prevent:

- Unauthorised or unlawful processing of personal data;
- Accidental loss or destruction of personal data.

Technical and organisational measures include:

- Secure servers, firewalls and password protection;
- Assigned access only to relevant persons;
- Encryption based software;
- All personnel working on behalf of TRAC are required to sign a confidentiality agreement.

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## How long do we keep hold of your data?

It is our policy to retain training files for 7 years. Data will be securely destroyed when no longer required.

Candidate payment details will normally be entered direct in to our card machine when payment is made over the phone. On the rare occasion that payment details are noted down, these are destroyed immediately following processing of payment.

## Data loss

If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the Information Commissioner's Office (ICO) will be notified within 72 hours.

## Your Rights

Under GDPR you have the following privacy rights:

**Right to object** - to our processing of your personal information.

**Access to your personal information** - you can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and how we dispose of it.

**Right to withdraw consent** - you can withdraw your consent at any time where you have given us your consent to use personal information.

**Rectification** - you can ask us to change/complete any inaccurate or incomplete personal information held about you.

**Erasure** - you can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

**Portability** - you can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

**Restriction** - you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

**Make a complaint** - about how we have used your personal information to us or to the [ICO](#).

We respect your right to object to any uses or disclosures of your personal information that are not:

- Required by law;
- Necessary for the fulfilment of a contractual obligation (e.g. provision of training);
- Required to meet a legitimate need of us as an employer.

If you do object, we will work with you to find a reasonable resolution.

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If in the future we intend to process your personal data for a purpose other than that which it was collected for, we will provide you with information on that purpose and any other relevant information.

## **Subject Access Request**

You have a right to see all the information that we keep about you. This is called a subject access request. We will comply with the one month timeframe for responses set down in the GDPR.

As a general rule, a copy of the requested information will be provided free of charge although we reserve the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

If this proves necessary, the person concerned will be informed of their right to contest our decision with the supervisory authority (the [ICO](#)).