



WELCOME TO OUR PRIVACY POLICY

NDFFA Training respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a format so you can go to the specific areas. Please also use the Glossary at the end of this notice to understand the meaning of some of the terms used in this privacy policy.

PURPOSE OF THIS PRIVACY POLICY

This policy aims to give you information on how NDFFA Training collects and processes your personal information through your use of our website and other means including post, telephone and email, including any data you may provide through our website when you sign up to a service or send information requesting your preferences, participate or other social media functions, submit a registration form or contact us by any other means.

It is important that you read our privacy policy and any notices we may provide on specific occasions when we are collecting or processing personal data about you. This is that you are aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

WHO WE ARE

In this privacy policy NDFFA Training means North Down First Aid Training our address:

Training Venue: 31a High Street, Bangor, Co Down, BT20 5BG

Postal Address: NDFFA Training Signal Business Centre 2 Innotec Drive, Balloo Road, Bangor, Co Down BT19 7PD

Business Address: 43 Marquis Avenue, Bangor, Co Down, BT20 3HF

By using our website: www.ndfatraining.co.uk (our 'Website') you are accepting and consenting to the practices described in this policy.

Depending on the purpose for which you are providing your personal data, the data controller (or entity responsible for the data collected) will be either us and/or any of NDFFA Training. Within the context of this policy 'we' means NDFFA Training or North Down First Aid Training.



THE DATA WE COLLECT ABOUT YOU

Personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** we **do not** collect data like: (IP) address etc
- **Profile Data** includes purchases or orders made by you, your interests, feedback and survey responses.
- **Usage Data** we **do not** collect usage data
- **Marketing and Communications Data**, we do not cold call or email you unless your course is about to expire or if a course you were interested in becomes available.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a course or a service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - apply for our services;
 - contact us about our services or publications;
 - request marketing to be sent to you;
 - carry out any transactions with us
 - provide CV's or other information about yourself for specific purposes
 - give us some feedback
- **Automated technologies or interactions.** We **do not** collect this personal data by using cookies and other similar technologies.



HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so. Normally, we will use your personal data in the following circumstances:

- Where we need to perform the contract, or an agreement we are about to enter into or have entered into with you to provide a course or service.
- Where it is necessary for our legitimate interests such as third party (awarding organisations) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent to us to use your personal data in a certain way such as direct marketing by email.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your data.

We may also process your personal data without your knowledge or consent, in compliance with this policy, where this is required or permitted by law.

Purpose/Activity:

Registration of you as a new customer/ Client

Type of data:

- Your Identity
- Contact Details such as Phone No-Email Address-Home Address
- Course Types and services that you may require
- Marketing and Communications about our services
- Technical

Lawful reason for processing including the basis of legitimate interest:

Presentation of a service or contract we may provide to you.

Purpose/Activity:

To process and deliver your order including:

1. Manage payments, fees and charges
2. Invoice Details or Purchase Order Details
3. Collect and recover money owed to us

Type of data:



- Identity
- Contact
- Financial
- Transaction

Lawful basis for processing including basis of legitimate interest:

1. Performance of an agreement or services provided by us to you
 2. Necessary for our legitimate interests (to recover debts due to us)
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Purpose/Activity:

To manage our relationship with you which will include:

1. Notifying you about changes to our terms or privacy policy
2. Asking you to leave a review or take a survey
3. New or other Courses/ services or expiry of your certification
4. Notify you Certification expiry of consumers

Type of data:

- Identity
- Contact
- Profile
- Marketing and communications

Lawful basis for processing including basis of legitimate interest:

1. Performance of a contract with you
2. Necessary to comply with a legal obligation
3. Necessary for our legitimate interests (to keep our records updated and to study how customers or consumers use our services)

Purpose/Activity:

To make suggestions and recommendations to you about our services that may be of interest to you in the future

Type of data:

- Identity
- Contact details

Lawful basis for processing including basis of legitimate interest:

Necessary for our legitimate interests (to develop our services and grow our business)

MARKETING

We may use your personal data to provide you with information about our services which we consider may be of interest to you. Where we do this via email, we will not do so without your prior consent except for when you have previously purchased services from us,



in which case, you will receive marketing from us unless you have told us that you do not wish to receive that marketing.

OPTING OUT

You can opt out of receiving email communication from the NDFFA Training by clicking the unsubscribe button at the bottom of any email which gives you the ability to unsubscribe from all NDFFA Training emails.

Alternatively, you can call the office 028 9122 8101, or notify us email info@ndfatraining.co.uk . It may take up to 14 days for the changes to come into effect.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with 3rd parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties
- External Third Parties

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Any payment request transactions are sent through worldpay or by BACS transfer from you to NDFFA Training.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data 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.

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal data from our records after Four years after



the date it was collected unless different retention periods apply, for example we will keep information if required by the Awarding Organisations or First Aid Industry Body we will remove or anonymise from our records at the relevant time.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

YOUR RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Note, however, that we may be unable to supply certain pieces of information that you have requested, if it is subject to legal privilege or relates to management planning. This will be notified to you, if applicable, at the time of your request.

You can submit a subject access request to NDFA Training by emailing us info@ndfatraining.co.uk or by calling our office 028 9122 8101.

To assist us in processing your request, you will need to provide the following information:

- Full name
- Course you attended or service we provided
- Telephone number
- Email address
- Information sought (Please describe, in as much detail as possible, the information you wish to have access to and if appropriate, any dates relevant to the information sought ie Course Type; Course Dates etc)

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request or as soon as possible thereafter.

You can submit a request, by emailing us info@ndfatraining.co.uk

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we



have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you would like to opt out from receiving marketing messages from us, please see section above on OPTING OUT.

WHAT WE WILL NEED FROM YOU

We will need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

THIRD-PARTY LINKS

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 24 May 2018.



It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

CONTACT DETAILS

Our full details are:

Full name of legal entity: NDFFA Training

Email address: info@ndfatraining.co.uk

Postal address: NDFFA Training, Signal Business Centre, 2 Innotec Drive, Balloo Road Bangor Co Down BT19 7PD

Telephone number: +44 (0)28 9122 8101

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the customer or Consumer the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a service to which you are a party or to take steps at your request before entering into such a contract or service.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES / INTERNAL THIRD PARTIES

Other agencies such as Awarding Organisations, FAIB, HSE, CITB acting as joint controllers or processors and who are based in the United Kingdom and provide IT and system administration services and undertake reporting of services provided to customers or consumers.

EXTERNAL THIRD PARTIES

- Other professional bodies acting as processors based in the United Kingdom who provide system administration services about courses you have attended and to clarify the result and expiry of any certification necessary to meet any legal requirements.



- Only information such as your Name-DOB and courses attended will be shared to third parties to meet their own legal requirements
- Contact details-email or payment details are passed onto third parties by NDFA Training.