

# EAS Mechanical - Privacy Policy

Last Updated:	September 2021
Approval Date:	September 2017
Review Date:	September 2024

#### Introduction

Everyone's privacy is important to us. This privacy policy explains what information EAS Mechanical may collect about anyone as we do business, how we store it and keep it safe, and everyone's rights regarding their data. There are new laws in place to protect everyone's data such as the **2018 GDPR regulations**, and EAS Mechanical complies with all the requirements of these laws.

#### When do we collect data?

There may be several times during our interactions with individuals when we may collect information about them:

- When they contact us to enquire about a course either by telephone, online or in person
- When they've booked and paid for a course
- When they come to the training centre to take the course.

#### What data do we collect?

We collect personal information about anyone when they make an enquiry, this can include:

- Name and date of birth
- Address and telephone number
- Email address
- Their employers name and address

When they book and pay for their course, we collect additional information including:

- National insurance number
- Job Title
- Their bank or credit card details when they pay for your course

When they come to the centre, we may ask for more information including:

- Passport photo
- Proof of your previous qualifications



#### There are 3 main reasons that allow us to legitimately process this data:

#### Contract

If anyone takes a course with EAS Mechanical or places an apprentice with us, this forms a contract between us. In order to fulfil this contract — to provide the individuals course and manage the qualifications - it is necessary for us to process this data. If anyone enquires about a course, this will be the first step towards entering into a contract with us, even if they don't actually book anything with us at the time.

#### Legitimate Interest

Sometimes we need to process their data in order to run our business effectively. For example, we might contact them to tell them about relevant courses, offer assistance with apprenticeship training or if we have good news to share regarding competitions our students are engaged with.

#### Consent

If we are not processing their data for reasons of Contract or Legitimate Interest, we can do so with their consent – for example if they have ticked a box saying they would like to receive an email newsletter from us.

Individuals can ask us which reason we have used for processing their data, and they can withdraw their consent at any time. Email <a href="mailto:eamon@easmech.co.uk">eamon@easmech.co.uk</a>

#### How is data stored?

- We collect an individual's data when we speak to them on the phone or in person or correspond with them by email or letter.
- We record their personal details and information about the courses they have taken or enquired about on our secure Training Database. Some information may also be stored on our server, for example payment records or copies of emails.
- We may also hold information about them on paper, for example course booking forms, registers, or other correspondence.

## Is the data kept safe?

Data security is a vital part of our business, and we protect all the data we hold, including any individual's personal information.



EAS Mechanical has a full Data Protection Policy covering all aspects of data security. All our staff are signatories to this policy and are fully trained in data security. If they are new and not trained, we continue to ensure all staff are up to date with in a month of employment.

The policy covers the following areas to offer individual's the strongest protection for their information:

- Electronic data storage including security software and firewalls, password protection, encryption.
- Paper data storage including secure file storage, clean desk policy, shredding.
- Sending data within the business including encryption, password protection.
- Deletion including timeframes for deleting unnecessary personal data.
- Financial transactions including safe storage and deletion of payment records.

## **Sharing data**

We protect individual's information by never passing it on to third parties without their consent.

Qualifications they take with us may be awarded by external bodies such as City & Guilds and BPEC. We have to share some data with them relating to the completion of individual's qualifications, for example some of your personal information and details of the assessments you have taken with us. We only give them the information they need to register and award the certificates.

## How long do we keep the data?

We will only keep the data for as long as it needed for the purpose that it was collected.

We do this in accordance with the data retention principles of the ICO's data protection guide.

These are some examples of why we may be retaining individual's data:

- If they take a course with us, we will keep their record on our database so that we can let them
  know when their qualification expires, or if the regulations change and they might want to take a
  new course
- We also keep a record of our financial transactions with them for our tax records

If we hold their data because they have asked to receive an email newsletter, we will keep their contact details until they unsubscribe.

# Individual's rights

Everyone has rights over their personal data, and EAS Mechanical are committed to respecting these rights and answering any queries or requests they might have about them.



## Individual's rights to be informed

Everyone has the right to be informed about the collection and use of their personal data. We hope this privacy policy gives all the information needed, but if anyone has any questions, please contact us – eamon@easmech.co.uk

## Individual's rights of access

Everyone has the right to access all the personal information we hold about them. They can request this by emailing us and we will confirm if we are processing their data and provide access to all the data we hold. We must respond to a request for access within one month.

## Individual's rights of rectification

If there are mistakes in the information we hold about an individual, they can ask to have inaccurate personal data corrected, or completed if it is incomplete. We must respond to a request for rectification within one month.

## Individual's rights to erasure

This is also known as the "right to be forgotten" and anyone can ask to have their personal data deleted.

They can ask for this if we only hold their data because they consented to receive marketing information such as email newsletters from us.

If we hold an individual's data because of our contract with them, or because we need it for the legitimate interest of our business (as outlined previously in this privacy policy), we are not required to delete it.

# Individual's rights to withdraw consent

If an individual has given us their consent to use their personal information, for example to send them communications about special offers or email newsletters, they can withdraw that consent at any time.

All communications that we send them will contain "unsubscribe" or "opt-out" options to make this easy for them.

If we have a contract with an individual, they can withdraw their consent for marketing communications, but we will still be able to contact them as part of that contract - for example to let them know that a qualification they hold with us is due for renewal.



#### **Questions or complaints**

If anyone has any questions about this privacy policy, or about the way we collect, store or use individual's personal information, please contact us:

Email <u>eamon@easmech.co.uk</u>

Call 01604 583060 Write Data Protection

EAS Mechanical Limited 69 St James Mill Road

Northampton NN5 5JP

If an individual is concerned about the way we are handling their data, or they feel that we have not answered their questions or requests properly, they have the right to complain to the Information Commissioner's Office.

#### This policy has been approved & authorized by:

Name: Eamon Wilson Position: Managing Director

Signature: Date signed: 18 Sept 2023