



QUALITY MATTERS

**FIRST INTERVENTION TEAM**

## PRIVACY NOTICE

(Compliant to GDPR 25<sup>th</sup> May 2018)**1. INTRODUCTION**

This privacy notice provides you (referred to as “data subject”) with details of how we collect and process your personal data through your use of our website (firstinterventiontraining.co.uk or firstinterventionteam.co.uk) or through your direct contact with First Intervention via email; telephone; postal communications; contractual engagement or face to face meetings.

By providing us with your data, you warrant to us that you are over 16 years of age. First Intervention Team is the data controller and we are responsible for your personal data (referred to as “we”, “us”, “FIT”, First Intervention Training” or “our” in this privacy notice)

**Contact Details:**

Our full details are:

Full name of legal entity: First Intervention Training Limited (t/a First Intervention Team)

Email addresses include, but not limited to: [fitteam@btconnect.com](mailto:fitteam@btconnect.com); [luke.hayes@fit-group.co.uk](mailto:luke.hayes@fit-group.co.uk); [jake.hayes@fit-group.co.uk](mailto:jake.hayes@fit-group.co.uk); [teresa.cross@fit-group.co.uk](mailto:teresa.cross@fit-group.co.uk); [gavin@fit-group.co.uk](mailto:gavin@fit-group.co.uk); [Vicky.turner@fit-group.co.uk](mailto:Vicky.turner@fit-group.co.uk)

Postal/Trading address: Thames Oil Port, Coryton, The Manorway, Stanford le Hope, Essex SS17 9LQ

Telephone No: 01375 676779

If you are not happy with any aspect of how we collect and use your data, you have the right to object and we have a responsibility to cease processing the data within one month from the date of objection.

Data subjects have the right of access to records we hold and application can be made in writing at any time. We will respond to such requests in accordance with the guidelines of the GDPR, 2018

It is very important that the information we hold about you is accurate and up to date. If your personal information changes in any way, please advise us, in writing, either by post or email.

**2. WHAT DATA DO WE COLLECT ABOUT YOU**

Personal data means any information capable of identifying an individual. It does not include anonymised data or generic details about a company. We may process certain types of personal data about you as follows:

- Identity Data may include your first name, last name, title, gender, ethnicity
- Contact data may include your billing address, delivery address, email address and telephone numbers
- Financial Data may include your bank account details
- Transaction Data may include details about payments between us and other details of purchases made by you.



QUALITY MATTERS

- Technical Data may include entries held in databases; software programmes as used by us to process applications and/or bookings for training and payments
- Usage Data may include information about how you use our website, products and services.

### **Sensitive Data**

Where we hold a licence to deliver a training course and whereby the awarding body requires some details to be collected on their behalf, the relevant details only are collected. Sensitive data refers to data that includes details about your race or ethnicity; religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

The sensitive data we collect on behalf of awarding bodies refers only to ethnicity. We do not collect sensitive data under any other circumstances.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We collect data about you through a variety of different methods, including:

- Direct interactions – you may provide data by filling in forms during a visit to our site or by communicating with us by post, phone, email or otherwise. This may occur when you :
  - order our products or services;
  - request resources be sent to you;
  - provide feedback on our services
- Third parties or publicly available sources (eg analytics providers such as Google)
- Identity and Contact Data from publicly available sources, such as Companies House and the Electoral Register based inside the EU

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests but only where your fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Purposes for processing your personal data as set out in the table below, is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are, where relevant

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

If you need details about the specific legal ground on which we are relying to process your personal data, please email us on any of the addresses as set out in page 1 of this Privacy Notice.



QUALITY MATTERS

Purpose/Activity	Type of Data	Lawful Basis for Processing
To register you as a new client	a) Identity b) Contact	Performance of a contract with you
To process and deliver your order including: a) Manage payments, fees and charges b) Collect and recover money owed to us	a) Identity b) Contact c) Financial d) Transaction e) Communications	a) Performance of a contract with you b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Advising you of our services in which you may be interested	a) Identity b) Contact c) Financial d) Transaction e) Communications	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests to keep our records updated and to study how clients use our services
To maintain computer based records to include: a) attendance registers b) services delivered c) Accreditation/Awarding Body (Third Party) requirements	a) Identity, including photograph, gender, ethnicity b) Contact c) Transaction d) Communications	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests to keep our records updated and to study how clients use our services
To administer and protect our business and our site (including testing, system maintenance) via a third party web based supplier	a) Identity b) Contact	a) Necessary for our legitimate interests for running of our business, provision of administration and IT services, network security b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about goods or services that may be of interest to you (including enquiries generated via our website)	a) Identity b) Contact c) Technical	Necessary for our legitimate interests to develop our products/services to meet demands of enquirers and growth of our business

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us using any of the email addresses as appear on the first page of this Policy.



QUALITY MATTERS

We may process your data without your consent if there is a legal obligation.

We share your data only with awarding bodies where there is a requirement under the terms of the licence of the awarding body and about which you have previously been made aware. We will not share your data with any third parties unless this is a requirement as set out below.

Awarding bodies respect the security of your personal data and treat it in accordance with the law, including requirements of the GDPR.

## 5. DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with parties set out below for legal purposes or for our mutual benefit in order to provide a service you have requested:

- Service providers who provide IT and system administration services
- Professional advisers including lawyers and auditors.
- HM Revenue & Customs, regulators and other authorities based in the UK and other relevant jurisdictions who require reporting of processing activities in certain circumstances

## 6. 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 of such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

## 7. DATA RETENTION

We will 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.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

By law, we have to keep basic information about our clients (including contact, identity, financial and transaction data) for six years after they cease being clients for tax purposes.

## 8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.



QUALITY MATTERS

These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

You can learn more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at: [teresa.cross@fit-group.co.uk](mailto:teresa.cross@fit-group.co.uk)

You will not have to pay a fee to access your personal data or to exercise any of the above referred to rights. However, if your request is clearly unfounded, repetitive or excessive, we may levy a charge. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and to 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. We will respond to all legitimate requests within one month. If your request is particularly complex, or you have made multiple requests, the one month period may be extended. In this case, we will notify you accordingly.