

<b>Statement Title</b>	General Data Protection Regulations (GDPR) Statement
<b>Reference</b>	GDORST01
<b>Date Reviewed</b>	Wednesday 16 <sup>th</sup> May 2018

## **General Data Protection Regulations (GDPR) Statement**

### **What is the EU General Data Protection Regulation (GDPR)?**

The EU General Data Protection Regulation (GDPR) came into force across the European Union on 25<sup>th</sup> May 2018 and brought with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21<sup>st</sup> Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing.

The new regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Ringway Training Limited have issued this statement to confirm and clarify amendments which have taken place within the organisation to ensure that the business is fully compliant with the new regulations.

### **Our Commitment**

Ringway Training Limited are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the requirements of the GDPR.

Ringway Training Limited are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation.

Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

## **Demonstrating GDPR Compliance**

Ringway Training Limited already have a consistent level of data protection and security across our organisation and we have audited each of our procedures to ensure that these are modified where required and compliant with the GDPR. We have completed the following action to ensure compliance:

### **Information Audit**

We have carried out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.

### **Policies & Procedures**

We have revised data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

#### **Data Protection**

Our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.

#### **Data Retention & Erasure**

We have updated our retention policy and schedule to ensure that we meet the 'data minimisation' and 'storage limitation' principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new 'Right to Erasure' obligation and are aware of when this and other data subject's rights apply; along with any exemptions, response timeframes and notification responsibilities.

#### **Data Breaches**

Our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.

### **Subject Access Request (SAR)**

We have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.

### **Legal Basis for Processing**

We have reviewed all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.

### **Privacy Notice/Policy**

We have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.

### **Obtaining Consent**

We have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.

### **Direct Marketing**

We have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials. However, at present, Ringway Training do not engage in any direct marketing activities with our customers.

### **Processor Agreements**

Where we use any third-party to process personal information on our behalf (i.e. payroll, accountancy, recruitment, hosting etc.), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.

### **Data Subject Rights**

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information via our website of an individual's right to access any personal information that Ringway Training Limited processes about them and to request information about:

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (*where applicable*) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

### **Information Security and Technical Measures**

Ringway Training Limited takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process.

We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including:

- SSL
- Access controls and passwords

- Encryptions

### **GDPR Roles and Employees**

Ringway Training Limited have designated Mark Mallender (Managing Director) as our Data Protection Officer (DPO), with responsibility for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

Ringway Training Limited understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans.

If you have any questions about our preparation for the GDPR, please contact Mark Mallender (Managing Director) on 01625 520 434 or at [mark@ringwaytraining.co.uk](mailto:mark@ringwaytraining.co.uk)

### **Ringway Training Limited - Existing Data Practices**

Ringway Training Limited do not engage in any direct marketing with our customers. Any discussion about our services are customer led through our open and transparent enquiry system which is accessed via our website. We do not engage with any 'cold calling' marketing.

We do not add any of our customers details to any mailing list and we do not sell or make available any of our customer's information to third parties.

Data which we hold about our customers is only used for the intended purpose. The main reasons for the use of data which we hold is to:

- Make contact with customers pending any service we are going to provide for them
- Invoice customers following the provision of services
- Produce accredited certificates to include the names of participants of services
- Post certificates to the identified customer contact

Hard copies of attendance sheets and feedback forms are securely scanned and provided to our customer by secure and encrypted email services. Hard copies are then destroyed by shredding.



**Mark Mallender**  
Managing Director  
Ringway Training Limited