

# Privacy Statement

## Rutledge Training Ltd

**This statement is provided with the intention to comply with your right to be informed under the General Data Protection Regulation.**

### **Who we are**

Established in 1989; **Rutledge Training Ltd** is a leading training provider in Northern Ireland; providing vocational and corporate training; and employment services. We currently have a branch network of 14 branches across NI; with a team of 160+ employees.

### **How your personal data will be used**

We may hold and process the following information:

1. **Your personal and contact details**- including your name, address, telephone numbers, email addresses, NI Number, Date of Birth,
2. **Particulars of your employment** - including your job title
3. **Particulars of your education/qualifications and skills** - including certificates, training; and assessment information
4. **Relevant medical information**- including educational needs information; and behavioural information
5. **Sensitive information including protected characteristics** under the Northern Ireland Act 1998 and Disability Discrimination Act 1995 for Equal Opportunities Monitoring and Compliance
6. **Attendance information** - such as training sessions attended, exclusions, number of absences and absence reasons

In addition, we will collect:

- Information about your initial assessment and induction on the programme.
- Information about your time on a programme, including your progress/achievements.
- Information required to support and evidence the payment of any expenses and other allowances you have claimed under the programme.
- Information on unemployment, homelessness is also collected which is requirement by the European Social Fund for statistical and monitoring purposes.

We are the controller and the processor of this information (We are the processor only for all personal data of participants on government funded training programmes). This data has been gathered with your consent from your previous giving of this information, your receipt of Marketing communications from us and/or your purchase or interest in our services.

Your data will be used to continue to provide you with details and information relating to our services offered by us. This is done on the basis of your continued consent. Should you withdraw your consent, your data will then be retained and added to our 'Unsubscribed User' lists so that we are aware to no longer provide you with details and information relating to our services.

### **Why the personal data is legally required**

The information we wish to gather about you is collected on the grounds of;

- **Part of a statutory requirement** - We share student's data with the Department for Education (DfE), the Education Training Inspectorate (ETI), and the Careers Service; on a statutory basis.
- **A contractual requirement** -To meet company contractual obligations to clients/students and to also respond to marketing enquiries.
- **Legitimate business interests** for processing data (to market the services offered by Rutledge Group). We use student data to support student learning, to determine eligibility, to monitor and report on student progress, to provide appropriate pastoral care, to assess the quality of our services; to ensure process of eligible finances/allowances, and to comply with the law regarding data sharing.

Through agreeing to this privacy notice you are consenting to Rutledge Group processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing the [creid@rutledgegroup.co.uk](mailto:creid@rutledgegroup.co.uk) or by phoning (028) 7035 2434 - see last section for full contact details.

### How long we will retain your information

**Client/Potential Client Marketing Data:** Your data will be kept until such time that you request that you no longer wish for us to provide you with details and information relating to our services and for a further period thereafter of 6 years.

**Student Data:** All client records will be deleted 16 years after the date of completion of the training qualification.

This period has been set for the protection of our organisation in the event of any complaint or claim for breach of contract or professional negligence claim. If such a claim has been filed, the data will be retained for a period of 6 years following resolution of that claim and for 6 years following the resolution of any further claims. This period has been determined for the protection of the organisation in the event any professional negligence or breach of contract claims in the event we use representation to defend any claims.

Your information may be shared with our data base providers, our marketing and commercial sales department, and our Management Team for the purposes of business development.

If it becomes our intention to use your information for any other reason, we shall advise you of those intentions prior to using the information for the additional purpose(s) as well as advising you of any other details within this statement which may be affected.

### Your rights

You have the right to be informed of fair processing information with a view to transparency of data. This statement is intended to fulfill that right

You have the right to access the information we hold. You should make such a request in writing to our Data Controller using the below contact information. We shall provide the data within 1 month. In exceptional cases we may extend this to 3 months. You will be notified within 1 month when we believe this to be an exceptional case requiring a longer period of compliance.

You have the right to request the information we hold is rectified if it is inaccurate or incomplete. You should contact our Data Controller using the below contact information and provide her with the details of any inaccurate or incomplete data. We will then ensure that this is amended within one month. We may, in complex cases, extend this period to two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing. We have the right to refuse to erase data where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims. You will be advised of the grounds of our refusal should any such request be refused.

You have the right to restrict our processing of your data where you contest the accuracy of the data until the accuracy is verified. You have the right to restrict our processing of your data where you object to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our organisation's legitimate grounds override your interests. You have the right to restrict our processing of your data when processing is unlawful and you oppose erasure and request restriction instead. You have the right to restrict our processing of your data where we no longer need the data and you require the data to establish, exercise or defend a legal claim. You will be advised when we lift a restriction on processing.

You have the right to data portability in that you may obtain and reuse your data for your own purposes across different services, from one IT environment to another in a safe and secure way, without hindrance to usability. The exact method will change from time to time. You will be informed of the mechanism that may be in place should you choose to exercise this right.

You have the right to object to the following:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics

Whilst there is no anticipated automated decision making relating to the data you provide, you have rights where there is automated decision making including profiling. We may only do this where it is necessary for the entry into or performance of a contract, authorised by EU or the UK law or based on your explicit consent. Whilst it is not anticipated that this will occur, where it does, we will give you information about this processing, introduce to you simple ways for you to request human intervention or challenge a decision, and carry out regular checks to ensure that our systems are working as intended.

You have the right to withdraw your consent at any time.

### **Objections**

At any time, you may have the right to object to the processing of your personal data where processing is conducted for legitimate business reasons/ matters in the public interest/ direct marketing/ profiling.

If you exercise this right, then unless we have compelling reasons not to, we shall cease to process your data wherever data protection laws allow.

### **More information**

If you have any queries or you wish to speak to us about how your information will be used, then please contact our Data Controller, Catriona Reid at [creid@rutledgegroup.co.uk](mailto:creid@rutledgegroup.co.uk) or call (028)7035 2434 or write to Rutledge Head Office, 25-27 New Row, Coleraine, BT521AD

You have the right to lodge a complaint with a supervisory authority such as the Information Commissioner's Office. However, we advise that you exhaust our internal complaints procedure

prior to referring the matter to any supervisory, regulatory or accrediting body. A copy of our complaints process is available from our Data Controller at the contact information above.