

## **PRIVACY POLICY**

Surepath Training Limited, and Surepath Consulting trading under Surepath Training Limited, collectively referred to as “Surepath” hereon, is committed to respecting and protecting your privacy. This policy, as well as our Terms and Conditions, sets out the basis on which we process any personal data we collect or you provide us with. We will of course review it from time to time, and the latest revision date can be found at the top of this document.

### **VISITORS TO OUR WEBSITES**

When someone visits Surepath, either at [www.surepathtraining.co.uk](http://www.surepathtraining.co.uk) or at [www.surepathconsulting.co.uk](http://www.surepathconsulting.co.uk), we use a third party service, Google Analytics, to allow us to look at visitor behaviour patterns. Google Analytics does this for us by tracking certain non-personally identifiable information about the use of our web sites. We do this to find out which parts of the sites are most and least used, which will help us better develop the websites in future.

The information collected is stored by Google Analytics in log files and is used for aggregated and statistical reporting. This information is not linked to personally identifiable information.

### **SECURITY AND PERFORMANCE OF OUR WEBSITES**

Surepath uses a third party, 1&1, to host our website in the UK. They are ISO 27001 compliant. Further details of their hosting privacy notice can be found using the following link: <https://www.1and1.co.uk/terms-gtc/terms-privacy/>

### **COMPLETING THE CONTACT US FORM ON OUR WEBSITES**

When you complete our Contact Us form on our websites, you send Surepath your name, email address, company, position and details of your enquiry. Optionally you may supply us with your telephone number. We will use this information solely to reply to your enquiry and not for any marketing purposes unless you expressly consent to such.

### **COOKIES**

Our websites uses cookies. These are small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the ‘About Cookies’ website at <https://www.aboutcookies.org/>. This site offers guidance for all modern browsers.

### **EMAIL COMMUNICATIONS**

Unless explicitly stated, email is not secure. We recommend that you do not send any confidential information through email. If you send email to us, we may retain the contents of your email message, your email address, and our response.

## **SUREPATH TRAINING NEWSLETTER**

For legitimate business interests (namely marketing), we produce newsletters. We use a third party provider, MailChimp, to deliver our newsletters via email. We use MailChimp to gather statistics on the use of the email, including tracking the frequency with which the various articles and links are followed. For information on their privacy policy, follow this link: [https://mailchimp.com/legal/privacy/?\\_ga=2.181964967.105993076.1527176761-585563343.1526022148](https://mailchimp.com/legal/privacy/?_ga=2.181964967.105993076.1527176761-585563343.1526022148)

We originally generated the distribution email list from our existing and potential clients, suppliers and other business contacts. The newsletter has been produced since January 2017 and it has always provided recipients with the option to unsubscribe at any time. This option will remain in all newsletters, as will an option for subscribers to change their preferences.

We will retain the contact details for subscribers for a period of 5 years from the date you last made contact with us.

## **CLIENTS AND SUPPLIERS (NON-CONTRACTUAL CONTACTS)**

For marketing purposes, if you have contacted us as a potential or existing client or supplier, your contact details will be held securely, electronically, and retained for a period of 5 years from the date you last made contact with us.

We may use your details to contact you to discuss potential future work or issue you with marketing material. We will not use your data:

- to issue you with our newsletter unless you specifically subscribe to it.
- share your personal details with any other 3<sup>rd</sup> parties other than MailChimp as described above.

## **CLIENTS AND SUPPLIERS (CONTRACTUAL CONTACTS)**

Contact details for Clients and Suppliers with whom we have worked are retained for the period of the contract plus 6 years from the date on which a contract is completed. Details retained include bank information for payment purposes. We do this to fulfil the contract we have with you and to meet statutory, legal and regulatory requirements.

We may use your details to contact you to discuss potential future work or issue you with marketing material. We will not use your data:

- to issue you with our newsletter unless you specifically subscribe to it.
- share your personal details with any other 3<sup>rd</sup> parties other than MailChimp as described above.

## **SUB-CONTRACTORS AND CONTRACTORS**

As part of our legal and statutory obligations, and to meet internal quality and technical accreditations, we may ask sub-contractors and contractors for information to support their competence, eligibility and fitness to work for us. We will usually ask for this information to be updated annually. Information we ask for may include personal information such as CPD certificates, qualifications and membership certificates. This information will be stored safely and retained for 6 years. We will only share it with regulators and auditors where necessary.

## **PERSONAL DATA STORAGE AND SECURITY**

The security of your personal data is a major concern for us. We have legal obligations to keep it safe and handle it with care. The penalties for not doing so can be very high.

With the exception of the data stored with Mailchimp for the exclusive issue of our newsletter, all of our data is held electronically and stored on servers in UK data centres with ISO 27001 (Information Security Management) accreditation. We have written agreements in place which comply with the requirements of UK data protection legislation.

The data stored with Mailchimp is stored in the USA in secure environments that are annually certified to comply with EU/US and Swiss Safe Harbor Frameworks. The only data stored with Mailchimp are your name and email address, and your marketing preferences with respect to the newsletter.

## **WHAT ARE YOUR RIGHTS?**

You have the following rights under the GDPR:

- The right to be informed. You have the right to be informed about the collection and use of your personal data. This privacy notice fulfils that requirement.
- The right of access. All of the information we have about you can be provided on request.
- The right to rectification. If you become aware of any errors or omissions in your data, please advise us and we will update our records accordingly.
- The right to erasure. In certain circumstances, you have the right to request that we delete personal data held on you. This does not apply if we have a legal reason for retaining it.
- The right to restrict processing. In certain circumstances, you have the right to ask us to 'restrict processing of data'. This means we would need to secure your data but not otherwise use it.
- The right to data portability. You have a right to obtain some of the personal data we hold on you in a 'structured machine-readable' format. The information we hold on you can be provided to you in a spreadsheet format on request.
- The right to object. You have the right to opt-out of any marketing communications that we may wish to send you. You can change your marketing preferences by advising us at any time, or changing your newsletter preferences, or by using the 'unsubscribe' link contained in our newsletters and marketing emails.
- Rights related to automated decision-making including profiling. Surepath does not apply any automated decision-making or profiling to any of your personal data.

If you have any questions about how Surepath use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us on 01246 807808.

## **RIGHT TO LODGE A COMPLAINT**

If you have any concerns or complaints about how we use your personal data, we hope you will alert us to these directly by contacting us on 01246 807808.

You are of course entitled to complain direct to the Information Commissioners Office (ICO), which is the supervisory authority in the UK. Their contact details and the procedure can be found at <https://ico.org.uk/>