



Data Protection Policy & Procedure

Version control

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1.0	Paola Luciano Marshall	Initial document	10 Jan 2019
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1.3	Paola Luciano Marshall	Document updated	26 July 2021
1.3	Sandra Alexander	QA reviewed	07 Jun 2022

1. Policy Statement

'Plane Training Ltd needs to collect and use certain types of information about the applicants, learners, contractors, employees, suppliers, and other stakeholders for a variety of business purposes.

This policy describes how this personal data is collected, handled and stored to meet the company's data protection standards and comply with the Data Protection Act 1998 and General Data Protection Regulation (GDPR) from May 2018.

'Plane Training Ltd is registered with the ICO – Information Commissioner's Office.

2. Scope

The purpose of this policy is to set out how the Company meets its legal, statutory and regulatory requirements under the data protection laws.

Data is collected by 'Plane Training Limited of Newlands Farm, Dewhurst Lane, Wadhurst, East Sussex TN5 6QE.

The data protection laws include provisions that promote accountability and governance and as such the Company has governance measures in place to meet these provisions. The aim of such measures is to ultimately minimise the risk of breaches and uphold the protection of personal data.

We are committed to ensuring that all personal data processed by the Company is done so in accordance with the data protection laws and its principles. We ensure the safe, secure, ethical and transparent processing of all personal data and have stringent measures to enable data subjects to exercise their rights.

We aim to ensure that this policy will be adhered to by everyone within the Company meaning employees, contractors, agency workers, volunteers, interns and agents engaged with the Company.

3. Procedures

Fair and lawful processing

'PLANE TRAINING LTD will process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.

The IQA - Internal Quality Assurer's responsibilities:

- Keeping the board updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection training and advice for all staff members and those included in this policy
- Answering questions on data protection from staff, contractors and other stakeholders

- Responding to individuals such as clients and employees who wish to know which data is being held on them by 'Plane Training Ltd
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing

Company's Responsibilities

- Approving data protection statements attached to emails and other marketing copy
- Addressing data protection queries from clients, target audiences or media outlets
- Coordinating with the IQA to ensure all marketing initiatives adhere to data protection laws and the company's Data Protection Policy

Processing of all data must be:

- Necessary to deliver our services
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine business data processing activities
- Our Website and our ROMs/Quotes/Marketing material contain a link or how to access this Policy.

The notice:

- Sets out the purposes for which we hold personal data on customers and employees
- Highlights that our work may require us to give information to third parties such as expert witnesses and other professional advisers
- Provides that customers have a right of access to the personal data that we hold about them

Sensitive Personal Data

In most cases, where we process sensitive personal data, we will require the data subject's explicit consent to do this unless exceptional circumstances apply or we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety at work or safeguarding). Any such consent will need to clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.

Accuracy and Relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the IQA.

Staff/Contractors Personal Data

All staff/contractors must take reasonable steps to ensure that the personal data we hold on their behalf is accurate and updated as required. For example, if staff's personal circumstances change, it is requested to inform the IQA so that she can update your records.

Data security

- All staff must keep personal data secure against loss or misuse.

Storing Data Securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it
- Printed data will be shredded when it is no longer needed
- Data stored on a computer should be protected by strong passwords that are changed regularly. We encourage all staff to use a password manager to create and store their passwords.
- Data stored on memory sticks must be password protected
- Data should only be stored on designated drives and servers
- Data should be regularly backed up in line with the company's backup procedures
- Data should normally not be saved directly to mobile devices such as laptops, tablets or smartphones
- All servers containing sensitive data are normally protected by security software and firewall

Data Use

- When working with personal data, anyone working for 'Plane Training Ltd should ensure the screens of computers are locked when left unattended
- Personal data should not be shared informally

Use of cookies

- Cookies will be used when our website is used. We only use cookies from/on our own website Wix.
- We may also monitor how many times you visit the website, which pages you go to, traffic data and originating domain name of your internet service provider to improve your experience whilst visiting the website. This information helps us to build a profile of our users. This data will be aggregated or statistical, which means that we will not be able to identify you individually and therefore it will not be subject to data protection legislation.
- The use of cookies on our platforms, e.g. our Learning Management System for on-line courses, allows us to verify your identity and authenticate you as an authorised user on our system and enhance the performance of the platforms.
- You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, you will not be able to access our platforms without first enabling cookies.

Data retention/disposal

'PLANE TRAINING's staff/contractors must retain personal data for no longer than it is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data disposal policy.

Data Accuracy

- The law requires 'PLANE TRAINING LTD to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personnel data is accurate, the greater the effort 'PLANE TRAINING LTD will make into ensuring its accuracy.
- It is the responsibility of all employees/contractors who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

Subject access requests

Under the Data Protection Act 1998, individuals are entitled, subject to certain exceptions, to request access to information held about them. Such as:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations

Subject access requests from individuals should be made by email and addressed to the IQA. The IQA can supply a standard request form, although individuals do not have to do this. The IQA will always verify the identity of anyone making a subject access request before handing over any information.

4. GDPR Provisions

Where not specified previously in this policy, the following provisions will be in effect on or before 25 May 2018.

Privacy Notice – transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for our organisation. The following are details on how we collect data and what we will do with it.

We collect personal information (such as name, address and contact details), for example email address when an enquiry is made, when registering or purchasing products or services, or supplying products or services to 'Plane Training Ltd. We also collect personal information when our website is used, for example IP addresses; however, this will not be used this to identify an individual specifically.

We may receive information personal information from an employer about their employees as a supplier or customer. If information is given to us on behalf of someone else, it will be confirmed that either:

- a) The other person has a contractual relationship with the informer and that the informer will be transferring their personal data to 'Plane Training Ltd for specific purposes and/or

b) The informer has been appointed to act on their behalf and agreed that consent has been given about processing of their personal data.

Justification for personal data

We will process personal data in compliance with data protection principles. We will document the additional justification for the processing of sensitive data and will ensure any biometric and genetic data is considered sensitive.

Consent

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

Criminal record checks

Any criminal record checks are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Reporting breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the IQA of any compliance failures that are material either in their own right or as part of a pattern of failures

Monitoring

Everyone must observe this policy. The IQA has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.