

<p><b>Northern Counties Safety Group</b> <b>Privacy Policy</b> <b>14 May 2018</b></p>
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## **Who we are**

This Policy sets out the obligations of Northern Counties Safety Group (NCSG), a company registered in England under number 01266432, whose registered office is at Units 4 & 5 Evans Business Centre, Belmont Industrial Estate, County Durham, DH1 1ST (“the Company”) regarding the privacy of all personal data collected and defined by EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

## **Our Principles**

These 8 principles summarise our commitment to protecting your privacy:

- We only collect and use the personal information we need to provide or improve our products and services
- You can check whatever information we hold about you
- We will keep your personal information safe
- We are fair and open about how we use your details
- We will never sell your details or share it except in the ways mentioned in this policy or unless you ask us
- We will let you know if there are important changes that affect your information or how we use it
- We take responsibility for the information we hold about you
- We only keep your information for as long as necessary.

## **The Law**

The legislation that applies to this privacy policy includes the:

- Industrial Training Act 1982 and any relevant Levy Order
- Data Protection Act 1998 (DPA)
- EU Data Protection Directive 95/46/EC
- Regulation of Investigatory Powers Act 2000
- Electronic Communications Data Protection Directive 2002/58/EC
- Privacy and Electronic Communications (EC Directive) Regulations 2003
- General Data Protection Regulation ((EU) 2016/679) (GDPR) as introduced into national law on 25 May 2018
- All applicable laws, regulations and secondary legislation relating to the processing of personal data and privacy
- Guidance and codes of practice issued by the Information Commissioner
- Any successor legislation to the DPA and GDPR.

## **How we collect**

You give us information when you use our websites, products and services, including when you:

- Submit one of our forms
- Correspond with us by phone, email or otherwise
- Register with us

- Subscribe to our services
- Search for a product
- Participate in our discussion boards, chat or social media
- We collect information about you when you visit our websites through the use of cookies (read Cookies section below for full details).
- We may also get information from other sources, including:
- Third parties, such as external training organisations or booking agents

## **What we collect**

The information we collect from you could include your:

- Name, address, email and phone number
- Date of birth
- National Insurance number
- Banking information
- Professional role

## **How we use your information**

We use your information for many purposes, including to:

- Promote the interests of our company
- Manage our employees
- Provide education, training and advice services for our clients and membership
- Advertise, promote and market our services
- Administer certification, qualification and card schemes
- Notify you about a change to our service
- Carry out our contractual obligations

## **How we keep it safe**

We take the security of your personal information seriously.

We use technical measures, such as encryption, and carry out regular security reviews to keep our protections up to date. We also control access and ensure staff who are authorised for access are adequately trained in keeping your information safe.

Our procedures mean that we may ask you to prove your identity before we share your personal information with you.

Third-party websites you access through links on our websites will have their own privacy policies. We do not accept any responsibility or liability for them.

## **Sharing your information**

We do not share your information with others unless you have consented or it is necessary to do so because:

- Of our role and duties as an Approved Training Organisation (ATO) through the Construction Industry Training Board
- The law requires us to
- Of administrative or operational needs
- It is part of our terms of use.

When we do have to share information, it is likely to be with:

- Our service providers or booking agents
- Your employer or prospective employers
- Other (subcontracted) Training Providers
- Law enforcement agencies.

## **Data Transfer Outside the EEA**

Sometimes we may transfer your details to third parties outside of the European Economic Area (EEA). If this happens we will make sure the transfer and storage of your information still complies with UK or EEA laws and this privacy policy.

## **Cookies**

When you visit the NCSG websites, Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our site and to provide and improve our services to you.

You can delete cookies stored on your device at any time.

## **Email and Social Media,**

There are a number of ways you may communicate with us online, including by:

- Email
- Social media (such as Facebook, Twitter or Linked-in)

## **What we do**

When you use email, social media or other online platforms, it is likely you know what information you are sharing with us.

How we use and process your information, who accesses it, and how long we keep it, depends on the context in which we collected it, but follows the terms of our privacy policy and UK law.

The information is normally handled by our authorised staff, but if we intend to share it with third parties beyond the platform you have used, we will make every effort to let you know.

## **Payments and Receipts**

We do not use any financial information for any purpose you have not authorised, or disclose it to third parties without your permission.

In order to process electronic banking transactions between us, we collect sufficient data including bank account detail. In some instances, some of the data we add to our accounting systems is personal data – e.g. where we make or receive payments from sole traders.

When we make or receive payments to or from our trading customers or other parties, an individual's name or other personal identifying information may be used as a payment source or reference for these transactions.

Where the transaction is either a one-off or infrequent, we do not maintain any data beyond our end-of-year accounting process – i.e. data is retained in our accounting database for 12

months or less. Note however, our bank account will reference payee and/or receipt data reference for a period upto 7 years. In both cases, NCSG use secure systems and at least 2 factor security protocols to access the personal data in these systems.

Where there is an on-going relationship between NCSG and you/your company, we retain your banking detail in our accounting software, together with other personal data such as name (individual) or contact name (corporate).

## **Who has access to your information**

NCSG staff and contracted data processors have access to your payment details to carry out your transaction.

Our contracted data processors are;

- SAGE (UK) Ltd, North Park, Newcastle upon Tyne, NE13 9AA
- Debere North East, Swallow House, Parsons Road, Washington, NE37 1EZ

## **Children**

Our websites, services and products are not aimed at children and we do not knowingly collect any information from them.

We ask children not to register with us or give us any of their information.

Where we have inadvertently collected information from a child, we will delete it as soon as possible.

If you know that a child has given their information to us, please contact us at [nick.redpath@ncsg.co.uk](mailto:nick.redpath@ncsg.co.uk)

## **Your rights;**

You have the right to:

- Ask for a copy of any information we hold about you
- Withdraw any consents you have given
- Lodge a complaint with us or the [Information Commissioner's Office](#) or with any other relevant supervisory authority about how we handle your personal data
- Ask us to correct any inaccurate or incomplete information we have about you
- Ask us to delete your information from our records
- Ask us to send a copy of your information to a third party in a data portable format.

## **Changing your contact preferences**

You can change your contact preferences or withdraw your consents at any time by writing to us at [nick.redpath@ncsg.co.uk](mailto:nick.redpath@ncsg.co.uk) or:

## **Making a request to see your information**

To see the information we hold about you, you should make a Subject Access Request in writing, including your:

- Full name, including previous or other names, if appropriate
- Your address, or if you have been a delegate of one of our courses, then the employer details (name and address of employer) you were employed with when we first would have added your data to our platforms

and send it to:

Nick Redpath, Privacy Officer, Northern Counties Insurance Group  
Units 4 & 5 Evans Business Centre, Belmont Industrial Estate, County Durham, DH1 1<sup>ST</sup>

## **Additional Provisions – Delegate course bookings**

### **How we use your information**

We use your information to respond to NCSG has been supplied sufficient data to book your course and also to process and store your course accreditation. We manage an electronic booking system for construction training courses.

### **Who has access to your information**

NCSG employees who operate the course booking system or deliver training have access. A course booking may require the transfer of personal data to external accrediting training organisations and booking agents. On disclosure of personal data from NCSG such as details of your course and your accreditation, certain of these training organisations may become data controllers in their own right – i.e. if they need to effect their own processing in managing your accreditation. These organisations include;

- The Construction Industry Training Board, Bircham Newton, King's Lynn, Norfolk, PE31 6RH
- St Johns Ambulance, St John's Gate, Clerkenwell, London, EC1M 4DA
- Pasma, PO Box 26969, Glasgow G3 9DR
- Draeger Safety UK Ltd, Unit 2, Tern Place, Bridge of Don, Aberdeen, AB23 8JX
- North East Access Training, Unit 22, Drum Industrial Estate, Birtley, Tyne and Wear, DH2 1AG

In addition, NCSG use a number of technology support organisations and software vendors who provide solutions to assist in processing, maintain data and network integrity – i.e. for data back-up. The following companies have access to personal data held about delegates;

- Bright Office Ltd, Maple Court, Maple View, White Moss Business Park, Skelmersdale, WN8 9TW
- Garvey's IT Services, 6 Radstock Avenue, Stockton-on-Tees, TS19 9EB

Wherever personal data is shared between NCSG and third parties, it is done so under purposed processing agreements.

### **What we do**

We use your:

- Contact details to administer the course
- Identification information to prevent fraud

### **How long we keep it**

In most cases, the course accreditation duration is 5 years. After the expiry of your course, your personal data will be deleted from our systems.

## **Additional Provisions - Site Inspections;**

### **How we use your information**

NCSG captures sufficient information to facilitate site visits for health and safety related audits and incident response. The extent of personal data capture and processing is limited – typically a contact name (for the site) is captured when site visits are first arranged and this personal data is held as part of case files referenced under the name of the business.

### **Who has access to your information**

NCSG employees who operate the site inspection calendar have access to this information and are responsible for making sure it is captured and appended to the case file held on NCSG secure processing platforms.

In addition, NCSG use a number of technology support organisations and software vendors who provide solutions to assist in processing and maintain data and network integrity – i.e. back-up. The following companies have remote access to personal data held within a site inspection case file;

- iAuditor, 2<sup>nd</sup> Floor, 24 Lever Street, Manchester, M1 1DZ
- Garvey's IT Services, 6 Radstock Avenue, Stockton-on-Tees, TS19 9EB

Wherever personal data is shared between NCSG and third parties, it is done so under purposed processing agreements.

## **Questions**

If you have any comments or concerns about an aspect of this policy or any privacy or data protection issue, please email our Privacy Team at [nick.redpath@ncsg.co.uk](mailto:nick.redpath@ncsg.co.uk) or write to us at the above address.

Our Privacy Officer is Nick Redpath who you can contact through the email or address above.