



PRIVACY NOTICE FOR TRAINING CONTACTS

In accordance with the General Data Protection Regulation (GDPR), New Pathways has implemented this privacy notice to inform our training contacts of the types of data we process about them. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to people who are currently on our database of training contacts.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

New Pathways keeps certain data on people who have attended training or have expressed an interest in training, in order to carry out effective and efficient processes. We hold the data within our computer system.

Specifically, we hold the following types of data:

- a) personal details such as name, address, email, phone numbers
- b) nature of interest

C) COLLECTING YOUR DATA

You provide several pieces of data via email, telephone and via end of course evaluation forms when expressing an interest in training courses and events.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to provide you with relevant and appropriate information on our courses.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Maintaining up to date records about you to ensure effective correspondence can be achieved	Our legitimate interests
Assessing training needs	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data maybe collated about you if you attend a course. Under the definition such types of data can include:

- a) health
- b) sexual orientation
- c) race
- d) ethnic origin
- e) political opinion
- f) religion

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing

F) FAILURE TO PROVIDE DATA

Your failure to provide New Pathways with data may mean that we are unable to maintain contact with you and advise you of future training opportunities.

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate. We do not collate any criminal conviction data on our training contacts.

H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for training and the administration of that training will have access to your data. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is not shared with third parties and we do not share your data with bodies outside of the European Economic Area.

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. All of your data is kept on our computer system which is fully password protected.

J) RETENTION PERIODS

We only keep your data for as long as we need it. We will check in with you at regular intervals to see if you still wish to be on our database. If you, at any time, wish to be removed from the database please let us know.

K) AUTOMATED DECISION MAKING

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you on the basis of automated decision making.

L) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights on the ICO website.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

O) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is: Helen Stacey (Counselling Services Manager)