


# 4 Minutes Training Ltd

## Privacy Policy

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## 1. Document Control and Version History

<b>Version Number</b>	<b>Reason for Change</b>	<b>Date</b>
1.0	Initial Release	25 May 2018
1.1	Minor text changes	30 January 2019

## 2. Definitions

<b>Item</b>	<b>Definition</b>
4 Minutes	4 Minutes Training Ltd
Booking	The act of Booking one or more individual places on a course and/or the act of Booking a course for a group of people
Awarding Organisation / Body	The Organisation that oversees 4 Minutes to ensure compliance with its policies and Procedures. It acts as an intermediary between 4 Minutes and Ofqual.
ICO	Information Commissioner's Office – Manages Data Protection in the UK
GDPR	European General Data Protection Register
Staff	All staff working for 4 Minutes, either in a salaried, voluntary or Freelance capacity
Trainer or internal Assessor	A person that delivers the course and also assesses the learning during the course. Normally these roles are combined and a Trainer will be qualified as an Internal Assessor



### 3. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we store and handle that data and keep them safe.

We hope the following sections will answer any questions you have but if not, please do get in touch with us. Where it says 'email us', you can click on the email address at the top of this page.

It is likely that we'll need to update this Privacy Notice from time to time, so you are welcome to come back and check it whenever you wish. When you are using the 4 Minutes website, 4 Minutes Training Ltd is the Data Controller.

In the following text, '4 Minutes' should be taken to mean '4 Minutes Training Ltd'. 'we' and 'us' mean '4 Minutes'. 'you' means the person reading this notice.

### 4. Privacy Policy detail

#### What is 4 Minutes and how does it operate?

4 Minutes is a Training Organisation, operating as a Private Limited Company. It uses its own staff and also freelancers and third-party companies to deliver training courses to you, either individually or as part of a Group Booking by an Organisation that you are connected with.

#### Explaining the legal bases that we rely on

The law on data protection sets out a number of different reasons for which we may collect and process your personal data, including:

##### Consent

In specific situations, we can collect and process your data with your consent. For example, when you complete a Registraton Form for a First Aid course or you ask to become a Trainer with us or you tick a box to receive email newsletters. When collecting your personal data, we'll always make clear to you which data are necessary in connection with a particular service.

##### Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you attend a Regulated First Aid course we will need personal details such as Date of Birth and



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also proof of identity such as a photo ID to fulfil our Contractual obligations with the appropriate Regulator or its representative Awarding Organisation.

### Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting 4 Minutes to law enforcement.

### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your training history to offer you requalification or refresher courses when your qualification is close to expiry or to offer you a related course. If you have explicitly agreed, we will also use your email address details to send you direct marketing information by email, telling you about products and services that we think might interest you.

### When do we collect your personal data?

- (Potential) students / organisers
  - When you enquire about or register for a course
  - When you subscribe to our Newsletter
  - When you attend one of our courses
  - When you complete an expression of interest at one of our publicity sessions
  - When you contact us by any means for information / with questions etc.
  - When you enter prize draws or competitions
  - When you comment on or review our services (e.g. we may pass on a note of thanks to a Trainer (qv) )
  - When you've given a third party permission to share with us the information they hold about you
  - When you purchase something from our online shop
- (Potential) Trainers / Instructors / Assessors ('Trainer')
  - When you enquire about becoming a Trainer for us
  - When you submit your personal information (e.g. CV, qualifications) to allow us to process your application and also when you send us updates
  - When you deliver a course for us
  - When you've given a third party permission to share with us the information they hold about you



## What sort of personal data do we collect?

Some or all of the following:

- Students
  - Title
  - First Name(s)
  - Family (Surname)
  - Date of Birth
  - Gender
  - Ethnicity (Groups based upon 2001 census question)
  - Postal Address
  - Email Address
  - Email correspondence
  - Telephone
  - Mobile phone
  - Special Needs & Reasonable Adjustment Request
  - ULN (Unique Learner Number) consent to access and/or generate
  - History of courses attended (as run by 4 Minutes) and pass / fail / refer status
  - History of invoices and payments made
  - Your image may be recorded or photographed during a course as part of publicity photography (you will always be able to decline this at the time)
  
- Trainers
  - Title
  - First Name(s)
  - Family (Surname)
  - Date of Birth
  - Gender
  - Postal Address
  - Email Address
  - Email correspondence
  - Telephone
  - Mobile phone
  - Qualifications and Curriculum Vitae (CV)
  - History of courses delivered
  - Bank Account details (Number and Sort Code) to enable payment
  - Your image may be recorded or photographed during a course as part of publicity photography (you will always be able to decline this at the time)



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- Anyone not fitting into either above category. Information will depend upon what you provided us with but could be any or all of:
  - Title
  - First Name(s)
  - Family (Surname)
  - Gender
  - Postal Address
  - Email Address
  - Telephone
  - Mobile phone
  - Reasons for contacting us (e.g. course type of interest)
  - Any other information volunteered by you

## How and why do we use your personal data?

### Students

We use your data to process payments for your courses

We use your data to provide to the Awarding Organisations the information that they need to process your course results and verify your identity

We use your data to ensure that you then receive the Certificates for the courses

We subsequently use your data to remind you when Requalifications or Refreshers of your Certificates are due

If you are subscribed to our email Newsletter we will, from time to time, send out email Newsletters containing information that we consider would interest you

### Trainers

We use your data to demonstrate that you are a competent Trainer with in-date, appropriate certification

We use your data to send out email newsletters listing courses being organised by 4 Minutes that need trainers and other updates and information that we consider would interest you

We use your data to process your invoices for courses that you have delivered for us

### Others (including the above)

We use your data to keep you informed of upcoming courses, events, competitions and offers that we consider would interest you

We use your data to process any orders that you place through any of our websites. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations. For example, your details may need to be passed to a third party to supply or deliver the



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product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.

We use your data to respond to your queries, refund requests and complaints.

If You wish to change how we use your data, you'll find details in the 'What are my rights?' section below. Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for. For example, if your certificate expires, we cannot let you know if you've withdrawn your general consent to hear from us.

Sometimes, we will need to share your details with a third party who is providing a service through us. Without sharing your personal data, we would be unable to fulfil your request.

### [How do we protect your personal data?](#)

We protect your data by using one or more of the following methods:

Our email software is hosted on a Secure Server and the login is password protected

Any documents that you send us are either kept with the email or saved onto a secure Cloud Server (Microsoft OneDrive). Local copies are only accessible via password protected computers / laptops

Hard copies of course paperwork are secured in a locked filing cabinet at our office. This office is locked when not occupied and the building is secured and alarmed outside of office hours.

(Students) If you fail to provide suitable photographic ID on a course and subsequently email it to us, we will delete the email and the copy in the 'deleted emails' folder on our email software once we have verified it.

Our Newsletter software runs on commercial CRM platforms, running on secure servers.

We do not process credit/debit card payments directly as all transactions will be completed through a third party such as PayPal (course Bookings), Zettle (card payments in the field) or the vendor (for purchases from the shop). We do not store any credit/debit card details at all.

### [How long will we keep your personal data?](#)

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. At the end of that retention period, your data will be deleted completely.

Some examples of customer data retention periods:

Course data: When you attend a course, we will keep the personal data you give us for five years so we can comply with our legal and contractual obligations as well as supporting you in the case of a lost certificate and also reminders when your certificate is due for renewal.

Newsletter: If you are signed up to our Newsletter you will remain on the list indefinitely unless you indicate to us that you wish to be removed (by clicking 'unsubscribe' for instance). We currently do not have any process for revalidating the data.





## Who do we share your data with?

We sometimes share your personal data with trusted third parties. For example, Awarding Organisations and Governing Bodies. We only provide the information that they need to perform their specific service.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We may, from time to time, expand, reduce or sell the Business and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

We do not sell your data for financial gain or otherwise to third parties for Direct marketing purposes. Should you interact with a third party after clicking on a link on our website, we cannot be held responsible for any information that you choose to share with them, nor what they choose to do with that data.

For further information please contact our Data Protection Officer.

## Where is your personal data processed?

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

**International orders** If you are based outside the UK and place an order with us, we will transfer the personal data that we collect from you to the Company in the UK.

**Protecting your data outside the EEA** The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA. For example, this might be required in order to fulfil your order, process your payment details or provide support services.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## What are your Rights over your personal data?

An overview of your different rights. You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing.
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact The Data Protection Officer, 4 Minutes Training Ltd, 3 Timbers Walk, Maidenhead, Berkshire SL6 4QL or email [First.Aid@4Minutes.co.uk](mailto:First.Aid@4Minutes.co.uk) To ask for your information to be amended please contact us using either of the two above methods.



If we choose not to action your request, we will explain to you the reasons for our refusal.

### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Direct marketing. You have the right to stop the use of your personal data for direct marketing activity. We must always comply with your request.

Course reminders. You have the right to stop the use of your personal data to contact you when your certificates become due for renewal or to offer you similar courses. We must always comply with your request.

Checking your identity. To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### How can you stop the use of your data for Direct Marketing (Newsletter)?

Click the 'unsubscribe' link at the bottom of any email Newsletter.

email us using the email address that you want removed - and state that you wish to be removed from the Newsletter

### How can you stop the use of your data for certificate renewal reminders?

email us using the email address that you want removed - and state that you wish to be removed from further certificate renewal reminders.

In both cases, you may receive one final email stating that you have been removed, after which you will not receive further communication. In the case of course reminders we will then not be able to remind you that your certificates have / are about to expire.

### Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

### Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:



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Email us or write to us at 4 Minutes Training Ltd, 3 Timbers Walk, Maidenhead Berkshire SL6 4QL

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