**Website GDPR Statement**

Here at 2 Start limited we are committed to maintaining the trust and confidence of our visitors to our web site. In particular, we want you to know that 2 Start is not in the business of selling, renting or trading email lists with other companies and businesses for marketing purposes. We just don’t do that sort of thing. In this Privacy Policy, we’ve provided lots of information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

When you enquire about a course through 2 Start Limited or online your name, address data, email and contact number will be stored in our system, Monday Sales CRM. Please be assured that we do not share your personal details with any other company without your consent. We use that information for a couple of reasons: to tell you about courses you’ve asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you’re happy and satisfied. We don’t rent or trade email lists with other organisations and businesses.

We use a third-party provider, Brevo, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [MailChimp’s privacy notice](https://mailchimp.com/legal/privacy/). You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer Jennifer Newcombe at **accounts@2start-training.com**

When someone visits **www.2start-training.com** we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.

You are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection officer Jennifer Newcombe at **accounts@2start-training.com**

**GDPR Website & Customer Privacy Policy**

**About this policy**

This policy explains what types of personal information will be gathered when you visit the **2 Start Training** website, and how this information will be used. Please note that this policy applies to the main web pages (i.e. those in https://www.www.2start-training.com).

If you follow a link to any other website, please check their policies before you submit any personal information to those websites.

**Information collected**

On some parts of the website, you may be asked to provide some limited personal information in order to enable the provision of certain services **2 Start Training** may store this information manually or electronically. By supplying this information, you are consenting to **2 Start Training** holding and using it for the purposes for which it was provided. Information provided will be kept for as long as is necessary to fulfil that purpose.

We may also collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our webmasters. This is statistical data about our users’ browsing actions and patterns which does not identify any individual and allows us to ensure that content from our site is presented in the most effective manner for you and for your computer.

All calls may be recorded for training and monitoring purposes.

**How the information collected is used**

Personal information provided to **2 Start Training** by you will only be used for the purposes stated when the information is requested. Personal information will not be sold to third parties or provided to direct marketing companies or other such organisations without your permission. Personal information collected and/or processed by **2 Start Training** is held in accordance with the provisions of the Data Protection Act 1998.

Demographical and statistical information about user behaviour may be collected and used to analyse the popularity and effectiveness of the **2 Start Training** website. Any disclosure of this information will be in aggregate form and will not identify individual users.

We use your personal information for the following purposes:

(NOTE: each purpose will be considered as online, in person or over the phone.)

* Online:
	+ Web Forms
		- Enquiries
		- Account creation/registration
		- Newsletter signup
		- Course reviews
		- Comments/FAQs
		- Job Applications with both 2 Start Ltd and 3rd parties with vacancies wishing to promote via our website.
* Ecommerce orders & bookings
	+ Initial order/booking
	+ Re-order/booking
	+ Payment processing (via merchant)
* Marketing
	+ Google Click ID (advertisement) tracking.
	+ Facebook pixel and advertisement tracking.
	+ Microsoft Bing Clarity user experience monitoring.
	+ Google Analytics – Statistics
	+ Google Tag Manager – Injection of tracking for Google Analytics and tracking of specific events i.e. button clicks.
	+ Google Search Console
	+ Google Fonts
	+ Brevo Email Marketing
	+ Monday Sales CRM
* Web Hosting
	+ Kinsta Hosting
	+ Cloudflare
	+ IP monitoring for security and control of threats i.e. DDOS or known attack vectors/servers/countries.
	+ Website Databases (Live, Staging & Backup’s)
		- Orders
		- Bookings
		- Form submissions/enquiries
		- Comments
		- Reviews
	+ Server Logs
		- Request logs contain requesters IP.
	+ Cloud Based Documents
		- Google Drive
		- Google Documents (Sheets, Docs, Slides, Forms)
	+ Requests for Quotes/Estimates
	+ Invoicing
	+ Refunds
	+ Cancelations
	+ Paper Records
	+ Electronic records & assets
	+ Media Assets
		- Pictures
		- Videos
		- Audio recordings
		- Photos for Identification cards (ITSSAR, PASMA, IPAF)
	+ CCTV footage while at our premises
* Offline
	+ Credit account applications/processing
	+ Invoices
	+ Credit Notes
	+ Refunds
	+ Payment Processing
	+ Account Creation
	+ Accounts mandatory data retention (HMRC) – 7 Years.
* Microsoft Office Documents – Office Computers
* Staff notepads/notebooks.
* Filing Cabinets – Archive of documents
* Printed documentation
* All other purposes
	+ Phone calls – Horizon (inbound, outbound, internal, external)
		- Call recordings – Horizon hosted.
	+ Certification processing – with accrediting body
	+ Course setup & registration with accrediting body
	+ Vehicle GPS tracking

**How we store information collected**

Information which you provide to us will ordinarily be stored on our secure servers. However, we do work with third-party contractors, some of whom host and operate certain features of the website. Accordingly, information that we collect from you may be collected in or transferred to a destination outside the European Economic Area (“EEA”). That information may be processed by staff operating outside the EEA who work for us or for one of our contractors. By submitting personal information, you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

We may disclose your personal information to third parties if we are under a duty to disclose or share such information in order to comply with any legal obligation or to protect the rights, property or safety of **2 Start Training**, its members or others.

**How we use “cookies”**

Most of our web pages use “cookies”. A cookie is a small file of letters and numbers that we place on your computer or mobile device if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

For more detailed information on the cookies we use on **2 Start Training** web pages (i.e. those on https://www.www.2start-training.com) and the purposes for which we use them, please see our Cookie Statement.

**Access to information**

The Data Protection Act 1998 gives you the right to access information held about you. For further information about this right and how to exercise it, please get in touch. Contact details can be found below.

**Data Protection Principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those
4. Accurate and kept up to
5. Kept only as long as necessary for the purposes we have told you
6. Kept securely.

**The Kind of Information we hold about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

**We will collect, store, and use the following categories of personal information about you:**

* Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
* Date of birth.
* Gender.
* Marital status and dependents.
* Next of kin and emergency contact information.
* National Insurance number.
* Training dates.
* Copy of driving licence.
* Photographs.

**How will we use information about you**

**We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:**

1. Where we need to perform the training contract we have entered into with
2. Where we need to comply with a legal
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

**We may also use your personal information in the following situations, which are likely to be rare:**

1. Where we need to protect your interests (or someone else’s interests).
2. Where it is needed in the public interest [or for official purposes].

**CHANGE OF PURPOSE**

We will only use your personal information for the purposes for which we collected it, unless we reasonably

consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance

with the above rules, where this is required or permitted by law.

**How we use particularly sensitive personal information**

”Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written
2. Where we need to carry out our legal obligations and in line with our data protection
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

**DATA SHARING**

We may have to share your data with third parties, including third-party service providers and other entities in the group.  We require third parties to respect the security of your data and to treat it in accordance with the law.  If we do, you can expect a similar degree of protection in respect of your personal information.

**Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

**Which third-party service providers process my personal information?**

”Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services, HR services.

**How secure is my information with third-party service providers and other entities?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

**When might you share my personal information with other entities?**

We will share your personal information with other entities as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

**What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

**DATA SECURITY**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

**How long will you use my information for?**

**DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information.

**Your duty to inform us of changes**

**RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

**Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

* **Request** **access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
* **Request** **correction** of the personal information that we hold about This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request** **erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object** **to** **processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
* **Request** **the** **restriction** **of** **processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* **Request** **the** **transfer** of your personal information to another

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR Consultant in writing.

**No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the HR Consultant. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

**Contact**

Any queries or concerns about privacy on this website should be sent in writing to:

2 Start Ltd (Portsmouth), Unit 4 Shawcross Ind Est, Ackworth Road, Hilsea, Portsmouth, PO3 5HU

**Monitoring and Review**

This policy was last reviewed in August 2024.

This policy will be reviewed again by August 2025.

Last updated: 25/8/2024

**Reviewed by:** Caroline Moon (Finance Director)