



GDPR Data Privacy Notice for Clients & Suppliers

0 Introduction

- 0.1 The Driver CPC Consortium and its Member Training Organisations are committed to protecting and respecting its clients' privacy.
- 0.2 This policy, together with our terms of use and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 0.3 The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1 Definitions

- 1.1 **Data controller** - A controller determines the purposes and means of processing personal data.
- 1.2 **Data processor** - A processor is responsible for processing personal data on behalf of a controller.
- 1.3 **Data subject** – Natural person
- 1.4 **Categories of data: Personal data and special categories of personal data**
- 1.4.1 **Personal data** The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.
- 1.4.2 **Special categories personal data** The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.
- 1.4.3 **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.5 **Third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2 Who are we?

- 2.1 Each Member of The Driver CPC Consortium is a data controller with compliance monitored by the Lead Member. This means we decide how your personal data is processed and for what purposes. In the first instance you should contact your Member Training Provider. Alternatively you may contact the Lead Member via the Consortium website contacts page or by phone as per the footer of this document.

3 The purpose(s) of processing your personal data

- 3.1 We process your personal data in order to satisfy the delegate identification requirements of the competent authorities for the qualifications undertaken and, for private candidates, direct marketing.

4 The categories of personal data concerned

- 4.1 With reference to the categories of personal data described in the definitions section, we process the following categories of your data: Driving Licence Number; Address, Full Name; Date of Birth; Nationality; Photograph; Signature; vocational licences / certificates relevant to the training undertaken including – but not limited to – ADR; Digital Tachograph Cards; DQC; Mechanical Handling Equipment.
- 4.2 We may have obtained your personal data from your employer.

5 What is our legal basis for processing your personal data?

- 5.1 Personal data (article 6 of GDPR)
- 5.1.1 Our lawful basis for processing your general personal data:
- 5.1.1.1 Consent of the data subject to share their personal information with the competent authority for the purpose of recording training;
- 5.1.1.2 Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject. Legitimate interests include proving the client's identity to the competent authority where evidence is required in order to record such training.

Founder Members:

Hazchem Training Ltd 01260 252 252; R.L.R. Services 07973 214 041 (Lead)

Rode Training 08448 081 230; S.D.H. Training 01902 455 677

Contact details - www.drivercpcconsortium.co.uk

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- 5.2 Special categories of personal data (article 9 of GDPR) for direct employees
 - 5.2.1 Our lawful basis for processing your special categories of data:
 - 5.2.1.1 Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
- 6 Sharing your personal data**
 - 6.1 Your personal data will be treated as strictly confidential, and will be shared only with the competent authority for the purpose of recording training
- 7 How long do we keep your personal data?**
 - 7.1 We will retain your data either as paper or electronic media for 6 years as required by the competent authority after which it will be securely destroyed.
- 8 Providing us with your personal data**
 - 8.1 You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so will prevent the Consortium Member from recording and certificating training on your behalf.
- 9 Your rights and your personal data**
 - 9.1 Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:
 - 6.1.1 The right to request a copy of your personal data which we hold about you and that we correct any personal data if it is found to be inaccurate or out of date;
 - 9.1.2 The right to request your personal data is erased where it is no longer necessary to retain such data;
 - 9.1.3 If we relied on consent to process your personal data, you have the right to withdraw your consent to the processing at any time. This may result in the withdrawal of your qualification by the competent authority.;
 - 9.1.4 The right to request the Driver CPC Consortium to provide you with your personal data and where possible, to transmit that data directly to another data controller – known as the right to data portability – where applicable (i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means);
 - 9.1.5 The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
 - 9.1.6 The right to object to the processing of personal data, where applicable (i.e. where processing is based on legitimate interests or the performance of a task in the public interest/exercise of official authority; direct marketing and processing for the purposes of scientific/historical research and statistics)
- 10 Transfer of Data Abroad**
 - 10.1 We do not transfer personal data outside the EEA
- 11 Automated Decision Making**
 - 11.1 We do not use any form of automated decision making in our business
- 12 Further processing**
 - 12.1 If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.
- 13 Changes to our privacy policy**
 - 13.1 Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.
- 14 How to make a complaint**
 - 14.1 To exercise all relevant rights, queries or complaints please in the first instance contact your Training Provider or Clive Aisbitt (Consortium Lead). Contact details included in footer to this document.
 - 14.2 If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office by telephone. Email or in person at the Information Commissioner's Office (details on the ICO website).

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