

# Data Privacy Policy

TPB-Group Ltd is fully committed to full compliance with the requirements of the General Data Protection Regulation.

The Company shall so far as is reasonably practicable comply with the Data Protection Principles contained in the Data Protection Act to ensure all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and non-excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subjects rights
- Secure
- Not transferred between any system without adequate protection

## Personal Data

Personal data will be kept to a minimum and only what is required to support the deliverance of training to an individual along with certification.

## Processing of Personal Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

## Rights of Access to Information

Data subjects have the right of access to information held by the Company. Any data subject wishing to access their personal data should put their request in writing to the Operations Director. The Company will endeavour to respond to any such written requests as soon as reasonably practicable and in any event, within 30 days for access to records and 14 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to the Companies attention.

## Data Security

The Company will take appropriate technical and organisational steps to ensure the security of personal data.

All trainees are made aware of this policy and their duties under the Act.

The Company and their trainers are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data will be stored in appropriate systems and be encrypted.

## External Processors

The Company will ensure that data processed by external processors, for example, service providers, Cloud Services including storage, web sites etc. are compliant to this policy and the relevant legislation.

**Secure Destruction**

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with the best practice at the time of destruction.

**Retention of Data**

The Company may retain data for differing periods of time for different purposes as required by law or best practices, statutory obligations, legal processes etc.



Tom Beswick-Brown  
1<sup>st</sup> January 2024