

Privacy Policy (in addition to the Data Protection Policy - GDPR)

Who is collecting the data?

Keyturn Training Limited needs to keep certain information about its employees, customers and suppliers for financial and commercial reasons and to enable us to monitor performance, to ensure legal compliance and for health and safety purposes. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Keyturn Training Limited complies with the Data Protection Principles set out in the General Data Protection Regulation (GDPR).

What information is being collected?

With your first contact with Keyturn the data collecting normally involves:

- Full name
- Company name
- Company telephone number
- Email address
- Company address

When you sign a contract with Keyturn

- All of the above plus
- Direct dial telephone number (if applicable)
- Company mobile number (if applicable)
- It may be applicable to obtain consent for contact details from administrative for finance contacts with the organisation

For participants attending a Keyturn training session

- Full name
- Company name
- Job title
- Time in that role
- Email address

For participants attending an ILM programme

- Full name
- Company name
- Job title
- Time in that role
- Email address
- Date of birth
- Nationality

How is it collected?

Keyturn collect data in a number of different ways depending on the request of the individual

- Website forms
- Correspondence via telephone, email or postal
- Online bookings
- Sales orders – entering a contract with us
- Signing up to receive information from Keyturn
- Request following a signed contract with Keyturn

Why is it being collected and how is it being used?

Marketing – Legitimate Interest:

The data collected for marketing purposes is so that we can communicate with those who may have a legitimate interest in the service Keyturn provides. When collecting data from websites, or correspondence requests Keyturn use individual's names, email address, postal address and telephone numbers as a means to share the service Keyturn provide that may help individuals in achieving their strategic learning and development objectives within their organisation.

- Emails are sent at no more than one email a week
- Postal marketing is no more than one item a month
- Telephone calls

Provision of service – Contractual/Consent/Legislation/Legitimate Interest:

Keyturn provide learning and development programmes throughout the UK. The information that Keyturn holds on participants is only used for the purpose of delivering and monitoring our training events and follow-up assignments.

Where a qualification has been purchased by the individuals, their data will be passed on to the qualification provider, ILM. Details of ILM's privacy policy can be found here: [ILM Privacy Policy](#) Keyturn hold data on individuals for the duration of working with an organisation, and no longer than 2 years following the work that has taken place.

Where a subcontractor delivers the training workshop, the data will be forwarded to them. All subcontractors that work with Keyturn have agreed to Keyturn's sub-contractors data protection policy and follow guidelines of how to handle data in a safe and secure way.

Where individual's data is being kept based on a contract signed between Keyturn and the individual, it will be kept for the duration of the contract plus 6 years as required for legal, audit and regulations reasons.

Who will it be shared with?

As previously mentioned, the data is only shared with those who are working in partnership with Keyturn training. These are:

ILM (a City and Guilds Group Business) – who provide our qualifications service

Sub-contractors – those who deliver our training or support our marketing and sales projects

Training venues – where requested by individuals, Keyturn may book training venues and/or accommodation

ESFA Apprenticeship provision – for apprenticeship programmes, Keyturn are required by law to provide information to the ESFA to register apprentices onto training programmes that Keyturn provide

What will be the effect of this on the individuals concerned?

At any point the individual can have their data removed as long as it does not fall under the legislative reasoning to keep data.

All data is kept in a safe secure location, where information is kept on paper, it is locked away and has restricted access to only those who are required to use it. Any data kept on the PC is kept secure and all computers have the software to create firewalls and secure files.

Is the intended use likely to cause individuals to object or complain?

Your rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the pressing of your personal data, please contact us using the contact details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please

contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

For more information or if you have any questions regarding your use of data please do not hesitate to contact us on enq@keyturn.co.uk

Further information can be accessed on additional privacy and data protection policies:

[Website Privacy Policy](#) (Keyturn documentation)

[Privacy Policy](#) (Keyturn documentation)

[Training Team and Contracted Staff Policy](#) (Keyturn documentation)

[ILM Privacy Policy](#) (ILM Qualifications)

[Microsoft Dynamics Data](#) (Keyturn's data system)

[Inscape Epic Privacy Data](#) (when completing online behaviour profiles)

Updates/Reviews		
14 April 2018	Full creation	CJS