

Later Life Training Ltd GDPR Statement

Key details

- Policy prepared by: David Riddell
- Approved by board / management on: 30th March 2018
- Policy became operational on: 31st March 2018
- Reviewed on: 31st March 2024
- Next review date: 31st March 2025

This document details the policies and procedures put in place by Later Life Training Ltd to achieve GDPR compliance.

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Overview

Later Life Training Ltd are a Training Company, providing specialist, evidence based, effective exercise training for health and exercise professionals working with older people, frailer older people and stroke survivors throughout the UK and Europe. As such we are a data controller.

Registration

Later Life Training Ltd has been registered with the ICO since November 2015.

Privacy notices

Later Life Training Ltd has a **privacy policy** published on the company website.

Data protection policy

Later Life Training Ltd has a **data protection policy** which is reviewed annually. This document forms the basis of staff training on their responsibilities.

Information risks

Data is at risk of theft both physically from the office and electronically by external hackers or by means of malware. Our **information security policy** puts procedures in place to minimise these risks.

Data protection

Electronic data on our premises is protected by:

- A firewall between our network and the internet.
- Anti-virus software.
- Usernames and strong passwords.
- Access to data is restricted to only those users who require it.
- Regular backups are in place.

Encryption

- Data within our network is not encrypted because our current business management products do not support it, we will continue to review this situation and if encryption becomes available in the future it will be adopted.
 - **Xero accounts** - data is encrypted using industry-standard data encryption. Multiple layers of firewalls are also in place, with regular security audits. Access to the application is controlled with unique usernames and passwords.

- **Microsoft Exchange** - not currently encrypted although all mailboxes are username and password protected.
- **Website** - all connections to the Website are encrypted using industry-standard data encryption certificates. Industry standard security measures prevent unauthorised access to the host server while access to the application is controlled with unique usernames and passwords.
- **Database** - all connections to the application are encrypted using industry-standard data encryption certificates. Firewalls and access control rules prevent unauthorised access to the host server while access to the application is controlled with unique usernames and passwords.

Data protection impact assessment

Later Life Training Ltd acknowledges that any changes to our IT infrastructure or systems requires a fresh assessment of our data protection procedures, for instance if we replaced our accounting system, or changed to a different brand of firewall.

Information Security Policy

Later Life Training Ltd has an **information security policy** which is reviewed annually. This document forms the basis of staff training on their responsibilities.

Data protection officers

The office manager (David Riddell) assumes responsibility as the data protection officer.

Compliance

The Directors of Later Life Training Ltd are aware of their obligations under GDPR and continually monitor the business to ensure that they remain compliant with GDPR.

- Existing staff have been trained on their obligations under GDPR.
- New staff will receive a briefing on their obligations when being shown the data protection policy. New staff will also receive a briefing on their obligations when being shown the data protection policy and information security policy.

International transfers

Later Life Training Ltd do not transfer any personal data to international locations, all our systems are UK based. We do receive personal data from international locations, however these are generally treated as regular processing activities due to the locations they come from.

Operational Base

The company's operational base is in Killin, Scotland, UK. We do occasionally operate out with the EU.

Breach notification

Later Life Training Ltd acknowledges the obligation to report any breaches to affected customers and serious data breaches to the ICO. Such reports would be made by the company Directors within 72 hours.

Later Life Training Ltd – Data Controller

“The data controller determines the purposes for which and the manner in which personal data is processed. It can do this either on its own or jointly or in common with other organisations. This means that the data controller exercises overall control over the ‘why’ and the ‘how’ of a data processing activity.”

Information we hold and data processing activities

| <u>Purpose of processing</u> | <u>System</u> | <u>Categories of individuals</u> | <u>Categories of personal data</u> |
|--|---|--|---|
| <u>Staff administration</u> | <ul style="list-style-type: none"> ○ Paper ○ Electronic | <ul style="list-style-type: none"> ○ Employees ○ Self-employed tutors | <ul style="list-style-type: none"> ○ Contact details (name, address, email address, Tel nos) ○ National Insurance No. |
| <u>Payroll</u> | <ul style="list-style-type: none"> ○ Electronic (Santander) | <ul style="list-style-type: none"> ○ Employees | <ul style="list-style-type: none"> ○ Name, ○ Account number and sort code. |
| <u>Emails</u> | <ul style="list-style-type: none"> ○ Microsoft Exchange – mailboxes and public folders (accessed via Outlook and mobile devices) | <ul style="list-style-type: none"> ○ Any | <ul style="list-style-type: none"> ○ Emails received from customers (could contain any information provided by the customer) |
| <u>Invoicing</u> | <ul style="list-style-type: none"> ○ Electronic (Xero) | <ul style="list-style-type: none"> ○ Customers ○ Self-employed tutors | <ul style="list-style-type: none"> ○ Contact details (name, address, email address) |
| <u>Website</u> | <ul style="list-style-type: none"> ○ Electronic (GM Design) | <ul style="list-style-type: none"> ○ Customers | <ul style="list-style-type: none"> ○ Contact details (name, address, email address, Tel No.s) ○ Occupation ○ Qualifications ○ Funders details (name, email, tel no.) ○ Gender ○ Date of Birth |
| <u>Database</u> | <ul style="list-style-type: none"> ○ Electronic (Modus Scotland) | <ul style="list-style-type: none"> ○ Employees ○ Self-employed tutors ○ Customers | <ul style="list-style-type: none"> ○ Contact details (name, address, email address, Tel No.s) ○ Occupation ○ Qualifications ○ Medical history ○ Gender ○ Date of Birth |
| <u>E-Learning Platform</u> | <ul style="list-style-type: none"> ○ Electronic (Demokritos) | <ul style="list-style-type: none"> ○ Self-employed tutors ○ Customers | <ul style="list-style-type: none"> ○ Contact details (name and email address only) |
| <u>Customer Mailshots</u> (not marketing) | <ul style="list-style-type: none"> ○ Electronic (MailChimp) | <ul style="list-style-type: none"> ○ Customers | <ul style="list-style-type: none"> ○ Contact details (name and email address only) |
| <u>Customer Surveys</u> (not marketing) | <ul style="list-style-type: none"> ○ Electronic (Survey Monkey) | <ul style="list-style-type: none"> ○ Customers | <ul style="list-style-type: none"> ○ Contact details (name and email address only) |

Any personal information detailed above was collected directly from the individuals for the purposes of fulfilling our business contractual obligations.

Later Life Training Ltd does not share the above data with any other third party organisations except the following (these are clearly stated in our privacy policy);

- Count Accountants (our accountants)
- Expert IT Solutions (our IT Support Team)
- Modus Scotland (our Database support team)
- Demokritos (our e-learning provider)
- GM Design (our Website Administrator)
- MailChimp (Names and email addresses for customer mailshots)

- Survey Monkey (Names and email addresses for customer surveys)
- Santander (Names and bank account details)
- Xero (our accounting software)

Lawful basis

The lawful basis for holding the above data is as follows:

Personnel data – fulfilment of our obligations as an employer.

Customer data - fulfilment of our business contractual obligations and billing.

Record Keeping

We are required to keep a record of all data processing activities. This document details routine data processing activities such as employee administration. Any ad hoc data processing not covered by this document should be recorded in the GDPR data folder on our internal server.

Consent

We do not need to seek consent from our customers or staff because we have:

- A contract with the individual: for example, to supply goods or services they have requested, or to fulfil our obligations under an employment contract. This also includes steps taken at their request before entering into a contract.
- Legitimate interests: we are a private-sector organisation, we can process personal data without consent because we have a genuine and legitimate reason (including commercial benefit), unless this is outweighed by harm to the individual's rights and interests.

Children's data

Later Life Training Ltd does not store any children's data and will not do so in the future.

Right of access

Later Life Training Ltd acknowledges the right of access to any personal data we may hold about an individual, we expect such a request to be made in writing. Using the list of locations where we hold that data we will search each of these systems and provide a copy of any data we hold within 28 days.

Requests for right of access to data can be submitted by writing to our office address, and must include proof of identity.

Rectification of data

Later Life Training Ltd will act immediately to rectify any errors in the data we hold if we are notified of such errors by an individual. This could be a change of mobile phone number or email address, or correction of an error in the data we hold. We will confirm in writing (usually by email) when any request for data rectification has been actioned.

Requests for rectification of data can be submitted by email (info@laterlifetraining.co.uk), telephone (01838300310) or in writing to our office address.

Right to erasure, retention and disposal

Later Life Training Ltd acknowledges the right of an individual to be forgotten. Should such a request be received from a customer we will check our systems and remove any personal data in response to a written request. However we will retain their name and training results for training record purposes. Should such a request come from a current member of staff this request would need to be discussed with the member of staff by a company director as it may make on-going employment untenable.

Customer data is currently **retained on our database indefinitely** for training record purposes. Booking forms and contact forms received via our website are retained for 6 months, at which point Later Life Training Ltd has implemented an audit so they are then backed up to our server and removed from the website. Electronic invoices, which may contain an address or email address, will be retained indefinitely to maintain business records.

Data disposal for paper documents will be by shredding. Later Life Training Ltd has a contract in place with Shredall Group who fully complies with the BS EN15713 Secure Destruction of Confidential Material policy. The disposal of all confidential material has a full audit trail and once materials have been destroyed a certificate of destruction will be issued. This certificate will then be held on file for six years.

Data disposal for electronic records will be by deletion. These deletions will be mirrored in our backup devices over a period of a few weeks as the older backups are overwritten. Daily archive backups are made on our Xero Accounts system, Website and Database.

Requests for removal of data (the right to be forgotten) can be submitted by email (info@laterlifetraining.co.uk), telephone (01838300310) or in writing to our office address.

Right to restrict processing

Later Life Training Ltd acknowledges that individuals may request the restriction of processing (using) their personal data. In some cases this will result in the cessation of services from Later Life Training Ltd.

Requests to restrict processing of data can be submitted by email (info@laterlifetraining.co.uk), telephone (01838300310) or in writing to our office address.

Data Portability

All data that we store in electronic form can be exported as simple text files. Later Life Training Ltd will provide a copy of all personal data in electronic format within 28 days of receiving the request in writing.

Right to object

Should an objection be received from an individual who does not wish the company to process their personal data Later Life Training Ltd will immediately cease any such activity. Due to the potentially varied nature of such an objection the company directors would discuss any further action necessary.

Objections can be submitted by email (info@laterlifetraining.co.uk), telephone (01838300310) or in writing to our office address.

Automated decision making and profiling

Later Life Training Ltd does not knowingly carry out any such activity.