

Alpha Training NI Ltd. Privacy Notice

About Us:

We, Alpha Training NI Ltd. (also referred to as “we”, “us”, or “our”), are a registered training provider in Northern Ireland (Company no. NI621271). Our registered address for the company is 20 Crawfordstown Road, Downpatrick, Co. Down, BT308QQ)

The Purpose of this Notice:

This notice is designed to help you understand what kind of information we collect in connection with our courses and services and how we will process and use this information. While providing you with courses and services we will collect and process information that is commonly known as personal data.

This notice describes how we collect, use, share, retain and safeguard personal data.

This notice sets out your individual rights; we explain these later in the notice but in summary these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

What is Personal Data:

Personal data is information relating to an identified or identifiable natural person. Examples include an individual’s name, age, address, date of birth, gender and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to (and not limited to), and individual’s health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to sexual orientation.

Personal data may also contain data relating to criminal convictions and offences.

For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

Personal Data We Collect:

In order for us to provide and administer the courses and services we provide for you, we will collect and process personal data about you. We will also collect your personal data where you request information about our courses and services. We may also need to collect personal data relating to others in order to provide and administer courses and services (for example emergency contact details). In most circumstances, you will provide us with this information. Where you disclose the personal data of others, you must ensure you are entitled to do so.

You may provide us with personal data when completing online enquiries through our website, when you contact us via the telephone, when writing to us directly or where we provide you with paper-based forms for completion or we complete a form in conjunction with you.

We will share your personal data within our company and with business partners. This is normal practice within the training industry where it is necessary to share information with our awarding organisation in order to register learners and award qualifications.

We also share personal data with authorised third parties, this is necessary where we are required to do so by law.

We will collect your personal data when you visit our website, where we will collect your unique online electronic identifier, this is commonly known as an IP address.



We will also collect electronic personal data when you first visit our website where we will place a small text file that is commonly known as a cookie on your computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features. For more information you can request a copy of our website Privacy and Cookie Policy.

We may record your communications with us when contact our Alpha Training NI Ltd. team members and business services. We also collect personal data through the use of telematics or similar locational tracking services, where you have agreed to the use of this particular service.

Where we collect data directly from you, we are considered to be the controller of that data i.e. we are the data controller. Where we use third parties to process your data, these parties are known as processors of your personal data. Where there are other parties involved in administering courses and qualifications they may also process your data in which circumstance we will be a joint data controller of your personal data.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller.

As a providers of training courses, we will process the following categories of data:

- Personal data such as an individual's name, address, date of birth, gender, contact details and emergency contact information.
- Special categories of personal data such as health, medication, additional learning or physical needs, pregnancy and details on previous or current injury or ailment (physical and physiological).
- When credit/debit card payments are taken, these go directly to our AIB merchant services and are held in accordance with the Financial Conduct Authority (FCA). No paper receipt is printed.

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our courses and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

If you require details on how we collect personal data and with whom we share data with, please contact our Data Privacy Representative by e-mailing admin@alphatrainingni.com

Why do we need your Personal Data:

We will use your personal data for the performance of our contract with you, to confirm and ensure you are fit to take part and proceed with our courses and services, to register you with our accredited awarding organisation, to follow the procedures of our insurance policies, to respond to any requests from you about courses and services we provide and to process complaints. We will also use your personal data to manage your account, perform statistical analysis on the data we collect, for financial planning and business forecasting purposes and to develop new and market existing courses and services.

We will use the special category data we collect about you for the performance of our contract with you which is deemed to be necessary for reasons of substantial public interest. This allows us to provide you with training courses and services.

In enrolling in/purchasing our courses and services you should understand that you are forming a contract with us and our registered awarding organisation. If you contact us to request details on the services we provide, we consider ourselves as having a legitimate business interest to provide you with further information about our products and services. You may request to be withdrawn from all such marketing activities at any time.



In some situations, we may request your consent to market our courses and services to you, to share your data or to transfer your data outside the European Economic Area. Where we require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time by contacting our Data Privacy Representative as admin@alphatrainingni.com.

Data Retention:

- For all malpractice claims (for example gym based, studio based, outdoors or clinical based) we will retain your personal data at the end of any contractual agreement indefinitely. This data will be retained for the protection of you, our learners, and Alpha Training NI Ltd. in the chain of liability, should a late discovered incident give rise to a claim, we will be able to prove whether you were qualified to the level and area in question at the time of the incident.
- We will also hold your PAR-Q information indefinitely in case of a malpractice or late discovered incident resulting in injury giving rise to a claim against Alpha Training NI Ltd. and its tutors, we will be able to prove whether or not the injury was present prior to commencement of the course.
- For all additional paper-based forms, including (but not limited to) informed consent forms, teacher learner agreements and registration forms, we will retain your data for a period of 7 years at the end of any contractual agreement. This data will be retained for the protection of our learners, should a late discovered incident give rise to a claim, we will be able to prove whether you were qualified to the level and area in question at the time of the incident.
- Where you have requested details of our courses and services, and where this request does not progress to an enrolment, where you have chosen to opt in via our website we will continue to provide you with marketing information until you choose to opt out.
- Where you make a complaint, we will retain the data for 10 years.
- Where you or law enforcement agencies inform us about any active investigation or potential criminal prosecution, we will comply with legal requirements when retaining this data.
- The retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests for statistical analysis (profiling) and product development and marketing purposes.
- Sometimes we may need to retain your data for longer, for example if we are requested to provide evidence for your defence or defending ourselves in a legal dispute or as required by law or where evidence exists that a future claim may occur. Alpha Training NI Ltd.'s full Data Retention Policy is available on request.

You should be aware that we may use your data to identify courses and services that customers may be interested in, this is commonly known as profiling. You have the right to object to the use of profiling activities and the use of automated decision making (services/tools and techniques).

Please contact our Data Privacy Representative at admin@alphatrainingni.com if you object to the use of, or have any questions relating to the use of, your data, the retention of your personal data or the use of profiling and automated decision-making services/tools and techniques.

You can opt out of receiving marketing services by e-mailing admin@alphatrainingni.com.

Your Rights:

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the



data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data. These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- The right to be informed about the personal data being processed.
- The right of access to your personal data.
- The right to object to the processing of your personal data.
- The right to restrict the processing of your personal data.
- The right to rectification of your personal data.
- The right to erasure of your personal data.
- The right to data portability (to receive an electronic copy of your personal data).
- Rights relating to automated decision making including profiling.

Individuals can exercise their Individual Rights at any time. As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and for regulatory and other statutory purposes, including accreditation by the regulations outlined by the Office of Qualifications and Examinations Regulation (Ofqual).

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of data within the accreditation sector is complex and we ask you to keep this in mind when exercising your 'rights of access' to your information. Where we may be reliant on other organisations to help satisfy your request this may impact on timescales.

If you require further information on your Individual Rights or you wish to exercise your Individual Rights, please contact our Data Privacy Representative by e-mailing admin@alphatrainingni.com, or by writing to The Data Protection Representative at Alpha Training NI Ltd., 20 Crawfordstown Road, Downpatrick, Co. Down, BT308QQ.

Protecting Your Data:

We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data with our business partners and authorised third parties.

Data Privacy Representative:

To ensure data privacy and protection has appropriate focus within our organisation we have a Data Privacy Representative who reports to our senior management team. The Data Privacy Representative is Emma Brennan, who may be contacted at: admin@alphatrainingni.com.

Complaints:

If you are dissatisfied with any aspect of the way in which we process your personal data, please contact our Data Privacy Representative. You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office (ICO). The ICO may be contacted via its website which is <https://ico.org.uk/concerns/>, by live chat or by calling their helpline on 0303 123 1113.

How to Contact Us:



If you have any questions regarding this notice, the use of your data and your Individual Rights, please contact our Data Privacy Representative at Alpha Training NI Ltd., 20 Crawfordstown Road, Downpatrick, Co. Down, BT308QQ or by e-mailing admin@alphatrainingni.com or by telephoning 07515640905.

Alpha Training NI Ltd. is registered with the UK Information Commissioner, registration number ZA098111.

