



DATA PROTECTION - PRIVACY NOTICE

Privacy notice for TFL Online Limited

TFL Online are committed to protecting your privacy and we take the protection of your privacy/data very seriously. We will only use your personal information to deliver the products and services you have requested from us, and to meet our contractual and legal responsibilities and obligations.

The Data Controller

TFL Online is the Data Controller for the purposes of the Data Protection Act 2018 and in relation to all personal data provided to us. The primary legal basis for which we process this data is for the fulfilment of contracts to deliver training services.

How do we collect information from you?

We obtain information about you primarily when you engage us to deliver our products and services and during the administration of your relationship with us. Information is collected when you meet with us, complete forms, correspond with us, telephone us, or send us an email.

What type of information do we collect from you?

The information we collect from you will vary depending on which products or services you engage us to deliver. The personal information we collect can include all, or a combination of any of the following items: your name, address, telephone number, mobile telephone number, email address, date of birth, nationality, gender, marital status, employment details such as job role, responsibilities and status, and training needs within departmental structure and information about the firm and its products and services.

Sensitive Information

Certain types of personal information are classed as 'sensitive' under the Data Protection Legislation, or otherwise, referred to as 'special categories' of data. This includes information about your health, race, ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, trade union membership and genetic or biometric data.

We do not need to collect your sensitive personal data during the normal course of our business. However, sometimes we may indirectly come across sensitive information such as your health data. In order to be able to process any sensitive personal data, we will need your consent. In the event we are likely to (or do) come into possession of your sensitive personal data, we will contact you separately to seek your consent for its processing.

How is your information used?

In general terms, and depending on which products or services you engage us to deliver as part of our agreed contractual services, we may use your information to:

- allow us to perform our obligations under our Terms of Business
- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal and regulatory obligations
- send you a pre-course questionnaire asking you to inform us of your training needs
- prepare training materials to meet your learning objectives

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically five or six years. To ensure compliance with all such requirements it is the policy of the firm to retain all data for a period of up to 6 years from the end of the period concerned.

Disclosure of personal information

We will not disclose any information about you to any other parties. We will keep all of your personal information confidential unless you give us consent to transfer it to a third party.

Third Party Service Providers working on our behalf

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example where we engage contact trainers to deliver training courses. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

How you can access and update your information

The keeping of your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to us, or call us using the 'Contact information' noted below.

You have the right to ask for a copy of the information TFL Online holds about you.

Security precautions in place to protect the loss, misuse or alteration of your information

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your choices

We may occasionally contact you by post/email/telephone with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact information' below.

Your rights

Under Data Protection legislation you have the following rights free of charge:

1. **Access to your information:** You have the right to request a copy of the personal information about you that we hold.
2. **Correcting your information:** We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.
3. **Deletion of your information:** You have the right to ask us to delete personal information about you where:

- o you consider that we no longer require the information for the purposes for which it was obtained
 - o you have validly objected to our use of your personal information - see 'Objecting to how we may use your information' below
 - o our use of your personal information is contrary to law or our other legal obligations
 - o we are using your information with your consent and you have withdrawn your consent - see 'withdrawing consent to use your information' below
4. **Restricting how we may use your information:** In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.
 5. **Objecting to how we may use your information:** Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue. You have the right at any time to require us to stop using your personal information for direct marketing purposes.
 6. **Withdrawing consent to use your information:** Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.
 7. **Data Portability:** You have a right to receive your personal information that you have provided to us, in a structured, commonly used and machine readable format. You also have a right to have this personal data transmitted to another data controller (i.e. another business), where technically feasible to do so.
 8. **Right To Complain:** If you have a complaint regarding the way we are processing your personal data, please address it with us in the first instance in the hopes that we will be able to resolve the matter with you. However, if you do not want to address your concerns to us, or we have failed to satisfactorily respond to your data protection complaint, you have the right to complain to the Data Protection Supervisor.

The contact details are below:

Information Commissioners Office,
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Tel: +44(0) 303 123 1113

Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

Changes to our privacy notice

We keep this privacy notice under regular review and a copy can be found, printed or downloaded from our website at the following address: <http://www.tflonline.co.uk>. Paper copies of the privacy notice may also be obtained by using our 'Contact information' below.

This privacy notice was last updated on 22/05/2018.

Contact information

If you have any questions or concerns regarding this notice or you wish to exercise your rights, please contact us, addressing your query to the Data Protection Officer:

TFL Online,
20 Rolleston Road,
Holbury,
Southampton,
Hants,
SO45 2GB

Tel: 01732 357076

Complaints

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website: <https://ico.org.uk/concerns>

Cookies:

For information about our cookie usage please see the information below. In line with the statutory requirements for cookie usage we make you aware that we will use cookies and that you agree to our use of cookies.

Cookies can be used to recognize your IP (Internet Protocol) address and are used for your convenience in using our website (for example to remember who you are without you having to re-enter your password). We may use cookies to ensure you receive relevant information whilst on our website. They help us to improve and to deliver a better and more personalised service. They enable us to, for example (but without limitation):

- To estimate our audience size and usage pattern;
- To store information about your preferences, and so allow us to customise the website according to your individual interests and spending patterns;
- To speed up your searches;
- To recognise you when you return to the Website; and
- To enable us to target opportunities in accordance with your interests and spending patterns and to collate the information you have provided in order to strengthen our buying power with third party suppliers.
- You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access the Website.

If you want to find out more information about cookies, go to <http://www.allaboutcookies.org> or to find out about removing them from your browser, go to <http://www.allaboutcookies.org/manage-cookies/index.html>.

Please note that our suppliers and advertisers may also use cookies, over which we have no control.