

# **Brighter Horizons Training and Development**

# **Privacy statement**

We are committed to protecting your personal data in accordance with the Data Protection Act 2018 (DPA 2018) and the General Data Protection Regulations (GDPR).

We process personal data for several purposes and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

Our policy is to collect only the personal data necessary for agreed purposes and we ask clients to only share personal data where it is strictly needed for those purposes. We collect personal data from our clients or from third parties acting on the instructions of the relevant client.

We process personal data to provide professional services such as general or specific business advice as part of the range of services we offer. We also process personal data in the administration and management of our business.

Your business contact details may be used to provide you with information about our services and other information which we think will be of interest to you, unless you tell us not to.

We are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Personal data processed is kept by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our retention policy period for records and other documentary evidence created in the provision of services is 7 years.

We take the security of your data we hold seriously. We have a policy including procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect your data. We occasionally use third parties located in other countries to help us run our business – for example for electronic file or email storage/operations. As a result, personal data may be transferred outside the countries where we and our clients are located. This includes countries outside the European Union ("EU").

Under the DPA (2018) and GDPR, Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights.

### **Access to Data**

You have a right to access your personal data held by us and you can exercise that right by contacting us below. Our aim is to respond a request promptly and within the legally required limit of 40 days.



### **Update of Personal Data**

If you wish to update personal data submitted to us, please contact us below. Once we are informed that any personal data held by us is no longer accurate we will make changes based on your updated information.

#### Withdrawal of Consent

Where we hold data based on consent, individuals have a right to withdraw consent at any time. To withdraw consent to our processing of your personal data please contact us below.

## Other Rights

This statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability. For further information on these rights please contact us below.

### **Complaints**

If you do want to complain about our use of your personal data, please contact us below with the details of your complaint. You also have the right to register a complaint with the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to their website.

# Contacting us about your data

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Brighter Horizons Training and Development, 3 Grooms Court, Billingshurst, West Sussex RH14 9EU

Antonia Ogden-Meade MD, Brighter Horizons 25/05/2018