



GDPR Policy

Introduction

Johnson Training Ltd (the “Organisation”), hereafter referred to as **JTL**, is committed to providing high-quality training and consultancy services to its customers on time and within budget.

This policy explains how JTL collects, uses, stores and shares personal data and how we aim to meet our obligations under the **UK General Data Protection Regulation (UK GDPR)** and other applicable UK data protection legislation.

This policy is intended for our partners, learners, customers and other interested parties who receive, access or otherwise interact with JTL’s services.

Data Protection and the UK GDPR

JTL is registered with the **Information Commissioner’s Office (ICO)**.

For the purposes of applicable data protection legislation, JTL will generally act as the **data controller** in relation to personal data collected directly from individuals. This means that we determine why and how that personal data is processed.

What Personal Data Do We Collect?

Through our day-to-day business activities and interactions with learners, customers, employers and other organisations, we may, where applicable, collect and process personal data including:

- Your name;
- Your date of birth;
- Your gender;
- Information relating to specific learning requirements;
- Your contact details, including telephone number, postal address and email address;
- Your job title and employment details;
- Payment and billing information; and
- Other information reasonably required to provide our training, consultancy or related services.

Some information concerning specific learning requirements may constitute **special category personal data** under UK data protection legislation. Where this applies, JTL will ensure that there is an appropriate lawful basis and additional condition for processing such information.

Why Do We Collect Personal Data and How Do We Use It?

JTL collects and processes personal data for a variety of legitimate business and legal purposes. Where appropriate, we will make clear which information is required and which information is optional.

Depending on the circumstances, we may process personal data for purposes including:

- **Providing training and consultancy services:** to administer courses, registrations, assessments and other services requested by learners or customers;
- **Assessment, feedback and certification:** to provide feedback on assignment or assessment performance, address certification matters and contact individuals where necessary;
- **Consent:** where you have given us permission to use your personal data for a specific purpose. For example, you may choose to opt in to receive marketing communications about courses, services or other relevant opportunities;
- **Legitimate interests:** where processing is necessary for JTL's legitimate business interests and those interests are not overridden by your rights and interests. This may include handling complaints and appeals, improving our services and optimising your experience when using our website;
- **Contractual obligations:** where processing is necessary to enter into or perform a contract with you; and
- **Legal obligations:** where we are required to process or retain information in order to comply with applicable laws, regulations or other legal requirements.

Where we rely on consent, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Who Do We Share Your Personal Data With?

JTL takes appropriate steps to protect personal data and to ensure that it is accessed and processed only by individuals and organisations with a legitimate and lawful reason to do so.

In addition to authorised JTL staff, personal data may, where necessary and appropriate, be shared with third parties including:

- Members of staff at a learner's training provider or employer;
- External awarding organisations;
- Assessment, certification or quality-assurance organisations;
- Service providers that support the delivery and administration of JTL's services; and
- Regulatory, governmental or law-enforcement bodies where disclosure is required or permitted by law.

Where third parties process personal data on our behalf, JTL will take appropriate steps to ensure that suitable data protection and confidentiality arrangements are in place.

Data Security

JTL takes appropriate technical and organisational measures to protect personal data against unauthorised or unlawful access, use, alteration, disclosure, loss or destruction.

Access to personal data is restricted to staff and other authorised parties who require access for legitimate business purposes.

Data Retention

JTL retains relevant records and personal data for a period of **six years**, unless a different retention period is required by law, regulation, an awarding organisation, contractual requirements or another legitimate business requirement.

Personal data will not be retained for longer than is necessary for the purposes for which it was collected. At the end of the applicable retention period, records containing personal data will be securely deleted, destroyed or anonymised, as appropriate.

Where there is an ongoing legal, regulatory, contractual, complaint or certification matter, relevant records may be retained beyond the standard six-year period where necessary and lawful.

Your Data Protection Rights

Depending on the circumstances, individuals may have rights under UK data protection legislation, including the right to:

- Request access to personal data held about them;
- Request correction of inaccurate or incomplete personal data;
- Request deletion of personal data in certain circumstances;
- Request restriction of the processing of personal data;
- Object to certain types of processing;
- Request the transfer of personal data in certain circumstances; and
- Withdraw consent where consent is the basis on which personal data is processed.

These rights are subject to certain legal conditions and exemptions.

If you wish to exercise any of these rights, please contact JTL using the contact details provided by the Organisation.

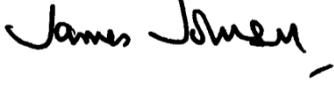
Complaints

If you have concerns about how JTL handles your personal data, please contact us in the first instance so that we have an opportunity to investigate and respond.

You also have the right to raise a concern with the **Information Commissioner's Office (ICO)**, the UK's independent data protection regulator.

Policy Review

JTL will review this policy periodically and update it where necessary to reflect changes in legislation, regulatory guidance or our business practices.

Name:	James Johnson
Position:	Managing Director
Signature:	
Date:	30 10 2018

Review date	Reviewed by:	Comments	Version
30 10 2019	JJ	No changes required	1
29 10 2020	JJ	No changes required	1
30/10/2021	JJ	No Change required	1
30/10/2022	JJ	No Change required	1
30/10/2023	JJ	No Change required	1
29/08/2024	MJ	Introduction added	2
01/09/2025	MJ	No change required	2
01/09/2026	MJ	Policy reviewed and updated	3
The next policy review date is 01/09/2027			