

## Privacy Notice

This is the privacy notice of Safeguarding Support Limited. In this document, "we", "our", or "us" refer to Safeguarding Support Limited.

We are company number 11015008 registered in England.

Our registered office is at Floor 1, 1 Market Street, Bingley BD16 2HP.

Contact number 01274 752299

Email [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com)

### Introduction

- 1 This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
- 2 We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
- 3 We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
- 4 We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
- 5 Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
- 6 The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
- 7 Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

### The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **Information we process because we have a contractual obligation with you**

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1 verify your identity for security purposes
- 2 sell products to you
- 3 provide you with our services

- 4 provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### **Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com). However, if you do so, you may not be able to use our website or our services further.

### **Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- 1 whether the same objective could be achieved through other means
- 2 whether processing (or not processing) might cause you harm
- 3 whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so
- 4 For example, we may process your data on this basis for the purposes of:
  - 5 record-keeping for the proper and necessary administration of our business
  - 6 responding to unsolicited communication from you to which we believe you would expect a response
  - 7 protecting and asserting the legal rights of any party

- 8 insuring against or obtaining professional advice that is required to manage business risk
- 9 protecting your interests where we believe we have a duty to do so

### **Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

### **Specific uses of information you provide to us**

#### **Information provided on the understanding that it will be shared with a third party**

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- 1 posting a message our forum
- 2 tagging an image
- 3 clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com).

### **Complaints regarding content on our website**

Our website is a publishing medium. Anyone may register and then publish information about himself, herself or some other person.

We do not moderate or control what is posted.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

## Information relating to your method of payment

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of PayPal or some other reputable payment service provider. That page may be branded to look like a page on our website, but it is not controlled by us.

## Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

## Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## Use of information we collect through automated systems when you visit our website

### Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 1 to track how you use our website
- 2 to record whether you have seen specific messages we display on our website
- 3 to keep you signed in our site
- 4 to record your answers to surveys and questionnaires on our site while you complete them
- 5 to record the conversation thread during a live chat with our support team

We provide more information about the cookies we use in our cookie policy.

### **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

### **Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

### **Disclosure and sharing of your information**

#### **Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

## Third party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

## Data may be processed outside the European Union

Our websites are hosted in Europe.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

We use the following safeguards with respect to data transferred outside the European Union:

- 1 the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- 2 the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union.
- 3 we comply with a code of conduct approved by a supervisory authority in the European Union.

## Access to your own information

### Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you may send us a request at [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com)

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com)

This may limit the service we can provide to you.

### Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## Other matters

### Use of site by children

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian

### Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### How you can complain

If you are not happy with our privacy policy or if have any complaint, then you should tell us.

You can tell us by email [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com) or you can write to us at 1 Market Street, Bingley, BD16 2HP

You can find further information about our complaint handling procedure by emailing us at [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com)

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

### Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 1 to provide you with the services you have requested;
- 2 to comply with other law, including for the period demanded by our tax authorities;
- 3 to support a claim or defence in court.

### Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## Privacy Statement

We, Safeguarding Support Limited (GTC) are committed to respecting and protecting the privacy of anyone using our site and the confidentiality of any information that you provide us with. The purpose of this statement is to set out how we use any personal information that we may obtain from you.

### **Data Controller and Owner**

Safeguarding Support Limited, Floor 1, 1 Market Street, Bingley, West Yorkshire, BD16 2HP, Email: [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com).

### **Types of Data collected**

Among the types of Personal Data that this our applications collects by itself, or through third parties, there are: Cookies, Usage data and email address.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the data collection.

The Personal Data may be freely provided by the User, or collected automatically when using our applications.

Any use of Cookies – or of other tracking tools – by our applications or by the owners of third-party services used by our applications, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for our applications to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through our applications and confirm that they have the third party's consent to provide the Data to the Owner.

### **Data collected on the Candidate Details Form**

When a service user attends a GCT training course the service user will be requested to complete a Candidate Details Form which will request some of their personal data. Personal Data collected on the Candidate Details Form will be: first name, last name, date of birth, gender, email address and phone number.

The information provided on this form will be used by GCT to manage bookings, including contacting service users if we have any queries, when we need to let service users know about any changes to the schedule and to fully process completed qualifications with our external awarding bodies. As part of GCT training course packages service users will have exclusive access to GCT Annual Training where available when it is due. Each year GCT will use the information provided on this form to email service users to remind them to complete their complimentary Annual Training until they need to requalify. When renewal of a qualifications is due, GCT will also use the information provided on this form to email service users to remind them when their regulated certificate is due to expire.

The information service users provide on this form will only be used to offer information and advice tailored to them, and to ensure that we do not provide them with any services which may be unsuitable. We take service user's privacy very seriously and will not pass your information to any other third parties (i.e. for marketing purposes).

### Mode and place of processing the Data



**Methods of processing:** The Data Controller processes the data of service users in a proper manner and shall take appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the data.

The data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration or external parties such as our awarding bodies and third party, technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the owner. The updated list of these parties may be requested from the Data Controller at any time.

**Place:** The data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. Service user's completed training course paperwork, GCT employee and associate documents that contains personal data are returned securely and kept at the Data Controller's operating offices. All completed training course paperwork, GCT employees and associate documents are locked away in secure cabinets that can be only be accessed by GCT operational staff. The operating offices are also locked outside of working business hours. For further information, please contact the Data Controller.

**Retention time:** The data is kept for the time necessary to provide the service requested by the user, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

**The use of the collected Data:** The data concerning the user is collected to allow the owner to provide its services, as well as for the following purposes: Analytics and contacting the user.

The personal data used for each purpose is outlined in the specific sections of this document.

**Analytics:** The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of user behaviour.

**Google Analytics (Google Inc.):** Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilises the Data collected to track and examine the use of our applications, to prepare reports on its activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network.

**Contact form (This Application):** By filling in the website contact form with their data, the User authorises this application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal data collected: email address, first name, last name, phone number and company name if applicable.

Additional information about Data collection and processing

**Legal action:** The user's personal data may be used for legal purposes by the Data Controller, in court or in the stages leading to possible legal action arising from improper use of our applications or the related services.

The user declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

**Additional information about User's Personal Data:** In addition to the information contained in this privacy policy, our applications may provide the user with additional and contextual information concerning particular services or the collection and processing of personal etc upon request.

**System logs and maintenance:** For operation and maintenance purposes, our applications and any third party services may collect files that record interaction with our applications (System logs) or use for this purpose other personal data (such as IP Address).

**Information not contained in this policy:** More details concerning the collection or processing of personal data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

**The rights of Users:** Users have the right, at any time, to know whether their personal data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This application does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honour the "Do Not Track" requests, please read their privacy policies.

**Changes to this privacy policy:** The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a user objects to any of the changes to the policy, the user must cease using our applications and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all personal data the Data Controller has about users.

**Cookies:** We collect information directly from you in a number of ways. One way is through our use of 'cookies'. Most websites use cookies in order to make them work, or to work more efficiently, as well as to provide information to the owners of the website. They help us to understand how our customers and potential customers use our website so we can develop and improve the design, layout, content and function of the site. Cookies are small text files that are placed on your computer's hard drive by websites that you visit. They save and retrieve pieces of information about your visit to the website – for example, how you entered the site, how you navigated through the site and what information and documentation was of interest to you. This means that when you go back to a website, it can give you tailored options based on the information it has stored about you on your last visit.

Some of our cookies are used to simply collect information about how visitors use our website and these types of cookies collect the information in an anonymous form.

Where there is a login process relating to buying products or services from us we also use cookies to store personal registration information so that you do not have to provide it to us again on subsequent visits.

The rules about cookies on websites have recently changed. If you are uncomfortable with the use of cookies, you can disable cookies on your computer by changing the settings in the preferences or options menu in your browser. You can set your browser to reject or block cookies or to tell you when a website tries to put a cookie on your computer. You can also delete any cookies that are already stored on your computer's hard drive. However, please be aware that if you do delete and block all cookies from our website, parts of the site will not then work. This is because some of the cookies we use are essential for parts of our website to operate. Likewise, you may not be able to use some products and services on other websites without cookies.

To find out more about cookies, including seeing what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you do not wish to accept cookies from our website, please leave this site immediately and then delete and block all cookies from this site. Alternatively, you may opt out of receiving information from us by e-mail, telephone, fax or post. Our phone number is 01274 752999, or you can e-mail us on [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com)

**Security:** We endeavour to take all reasonable steps to protect your personal information. However, we cannot guarantee the security of any data that you disclose online and we will not be responsible for any breach of security unless this is due to our negligence or wilful default.

**Your rights:** You have the right to ask us not to process your personal data for marketing purposes. We will aim to inform you before collecting your data if we intend to use your data for such purposes or we intend to disclose your information to any third party for such purpose. You can exercise your right to prevent this happening by checking certain boxes on the forms we use to collect your data.

**General:** You have the right to see personal data (as defined under the Data Protection Act) that we keep about you upon receipt of a written request. Any request should be sent to [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com)

**Review of this privacy policy:** We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us:

Email: [admin@safeguardingsupport.com](mailto:admin@safeguardingsupport.com) / Telephone: 01274 752299