

MEDICAL TRAINING SOLUTIONS LTD

Privacy Policy

About this policy

This policy describes how we use your personal data when you use our website (www.mtscourses.co.uk) or when we provide services to you. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

Who we are and how you can contact us

We are Medical Training Solutions Ltd. We are a UK registered company. Our registered company number is 11073734 and our registered address is Rouen House, Rouen Road, Norwich, Norfolk, NR1 1RB.

You can contact us in writing at the address above, or by emailing info@mtscourses.co.uk. If you would like to speak to us please call us on 01603 486448.

Please refer to the section on [Our Data Compliance Manager](#) for further contact information.

Our Data Compliance Manager

We have appointed a Data Compliance Manager who acts as our primary point of contact for any questions or concerns you may have regarding our handling of your personal data.

Our Data Compliance Manager is Harrison Young, who can be contacted by email at h.young@mtscourses.co.uk or by calling 01603 486448.

What personal data we collect about you

We collect:

- **personal data that you provide to us.** There are several ways in which you may share your personal data with us, for example, you may submit an enquiry via our website, post on social media sites that we run, or contact us by telephone, email or in person with a query or to provide feedback about our training sessions. The personal data we collect from you in those situations would usually include your name, job title, the name of the organisation you work for and the industry you work in, your telephone number and email address.

If you attend one of our training sessions we will ask you to provide your name, date of birth, email address and to let us know if, due to a disability, you require any reasonable adjustments to be made in order that you can take part in the training

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session and assessment. During the session, we will take notes in order to record your performance in practical elements of the assessment.

- **personal data that we receive from third parties.** If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. Some of our training sessions will be delivered by Consultants, in which case the personal data they collect during the training session (as set out above) will be passed to us.
- **personal data about your use of our website.** This is technical information and includes details such as your IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our website and where you went when you left, what pages you viewed or searched for, page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs).

What we use your personal data for

We use your personal data in the following ways:

- **personal data that you provide to us** is used to:
 - process and respond to any enquiries you make;
 - if you have contacted us on behalf of your organisation to arrange training for employees, we will use your contact details to communicate with you to arrange the training session and to let you know the outcome of the session (i.e. who has passed), and send you an email reminder when that employee's qualification is about to expire;
 - If you contact us directly to arrange training for yourself (for example, at an open session) we will use your contact details to communicate with you about the sessions available, to enrol you on a session, to let you know whether you have passed or failed, to send you a certificate from the awarding body (Qualsafe) and to send you an email reminder when your qualification is about to expire;
 - register the results of your assessment with the awarding body (Qualsafe);
 - generate your certificate and send this to you (or to your employer to pass to you if your training has been arranged through them);
 - process payment for our services;

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- if you provide feedback following one of our sessions, we may post this on our website, social media sites or other promotional materials, as well as using this information to review and improve our services. We will only publish anonymised feedback unless you give us permission to publish your details;
- send you information about further services we offer which may be of interest to you in accordance with your marketing preferences (see How we use your personal data for marketing);
- manage and administer our business;
- review and improve our service.
- **personal data that we receive from third parties (including the Consultant's delivering the training session) is**
 - combined with the personal data that you provide to us and used for the purposes described above.
- **personal data about your use of our website** is used to:
 - administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device;
 - to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to

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improve our website. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).

Consent and other legal grounds for processing your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- we are entering into and carrying out our obligations under a contract with you;
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights;
- we are subject to legal obligations that require us to use your personal data in certain ways (such as disclosing information to HM Revenue & Customs).

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

The most common situation in which we will process your personal data on the grounds of consent is where we wish to send marketing communications to you. Please refer to the section on [How we use your personal data for marketing](#) to read about our marketing practices.

To help you understand the legal grounds we rely on for different types of processing, we have set out an overview of the main processing activities we undertake and the relevant legal grounds below:

Categories of personal data used	Purpose	Legal basis
Name and contact details	To respond to your enquiries regarding our services.	Legitimate interest (in growing our business and developing new customer relationships) and/or contractual necessity
Name, contact details and	To provide you with the services you wish to buy	Contractual necessity and/or legitimate interests (to

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transaction history	from us and to collect money owed to us.	recover monies due to us)
Name and result of assessment	To inform the awarding body (Qualsafe) of the outcome of the assessment and to generate your certificate.	Contractual necessity
Name, contact details, transaction history	To manage our relationship with you e.g. to keep your details up to date, notify you of any changes to our contractual documents or privacy policies, and let you know when your qualification (or that of employees who you arrange training for) is about to expire.	Contractual necessity and/or legitimate interests (to keep our records updated and understand how our customers use our goods and services)
Name, contact details, transaction history and technical data about your use of our website	To manage and administer our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Legitimate interests (to run our business, provide administration and IT services, ensure network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercises) and legal obligations
Name, contact details, transaction history, details of which organisation you work for and industry you work in, technical data about your use of our website, your marketing preferences.	To develop and improve our website, products/services, and our customer relationships and experience	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business, to improve our products and services and to inform our marketing strategy)
Name, contact details, job title, organisation, and	To develop and improve our website, products/services, and our customer	Legitimate interests (to develop our business, to improve our products and

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feedback	relationships and experience	services and to inform our marketing strategy)
Name, job title, organisation and feedback	To include on our website, social media and other materials to promote our business.	Consent
Name, contact details, information relating to the requirement for reasonable adjustments.	To ensure that attendees who require reasonable adjustments to be made so that they can take part in the training and assessment are properly catered for and not at a disadvantage.	Explicit Consent

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right (or any of the other rights described below) by sending us a written request at any time. Please mark your letter **“Data Subject Request”** and send it to our data compliance manager (see the section on [Our data compliance manager](#) for contact details).

You also have rights to:

- prevent your personal data being used for marketing purposes (see [How we use your personal data for marketing](#) for further details);
- have inaccurate personal data corrected, blocked or erased;
- object to decisions being made about you by automated means or to your personal data being used for profiling purposes;
- restrict our use of your personal data;
- require that we delete your personal data (the “right to be forgotten”);

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- require that we provide you, or anyone that you nominate, with a copy of personal data you have given us in a structured electronic form such as a CSV file.

You can find full details of your personal data rights on the Information Commissioner's Office website at www.ico.org.uk.

Automated decision making and profiling

We do not make use of automated decision making or profiling.

When we will share your personal data with others

We share your data with the following people in the day to day running our business:

- If you are the person who has arranged the training on behalf of your staff, we will provide your name and contact details to the Consultant who will be delivering the training session;
- If you attend one of our training sessions, we will pass your name and the outcome of your assessment (whether you have passed or failed) to the awarding body (Qualsafe);
- If you attend a training session which has been arranged by your employer, we will inform your employer of whether you have passed or failed. If you have passed, we will send a copy of your certificate to your employer;
- advertisers and advertising networks (see [How we use your personal data for marketing](#) for more information);
- analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may also share your personal information with third parties on a one-off basis, for example, if:

- we sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets
- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [terms and conditions of supply](#) and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

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How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- only storing your personal data on our secure servers;
- encrypting any payment transactions made through our website using SSL technology;
- ensuring that our staff receive regular data security awareness training;
- ensuring that we have entered into appropriate data sharing agreements with our Consultants and that our Consultants are aware of the requirements under data protection law;
- keeping paper records to a minimum and ensuring that those we do have are stored in a locked office;
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems; and
- enforcing a strict policy on the use of mobile devices and out of office working.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

- you make an enquiry about attending one of our training courses, or arranging a training course on behalf of your employees, and indicate that you would like to receive details about other services we offer;
- you book one of our sessions, either for yourself or for your employees;
- you have told a third party that you would like them to pass us your contact details so that we can send you updates about our services;
- you have registered an account on our website and have indicated during the signup process that you are happy to receive marketing communications.

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We may send you marketing communications by email, telephone, automated calls, text message, or post, in accordance with the preferences you have indicated to us.

You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), about specific subjects (for example, you may like us to let you know when we release new courses, but not want to receive details about offers and promotions) or you may ask us not to send you any marketing communications at all.

You can check and update your current marketing preferences at any time by calling or emailing us using the details set out in the [Who we are and how you can contact us](#) section above.

We never share your personal data with third parties for marketing purposes.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. Where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We have listed below organisations outside of the EEA with whom we may share your personal data:

Supplier	Reason for transfer	Location	Safeguard
Google LLC	Cloud storage of documents in Google Drive	USA	Google LLC is registered with the EU – US Privacy Shield

How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- If you attended a course with us and successfully obtained a qualification, we will keep a copy of your name, contact details and assessment for 3 years.

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- If you attended a course with us and were not successful in obtaining a qualification, we will keep a copy of your name, contact details and assessment for 3 years.
- If you have contacted us to arrange training for your employees, we will retain a copy of your contact details for 3 years.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

If you have any questions about our data retention practices please contact our data compliance manager (see the section on [Our data compliance manager](#) for contact details).

How you can make a complaint

If you are unhappy with the way we have used your personal data please contact our data compliance manager to discuss this using the contact details set out in the '[Our Data Compliance Manager](#)' section above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website (www.mtscourses.co.uk) or you can contact us (see [Who we are and how to contact us](#)) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the end of the policy and the date on which that version of the policy came into force.

This is policy version 1 which came into effect on 01/10/2018.