



## Data Protection and GDPR Policy

### Rationale

KEITS Training Service Ltd ("the Company") is committed to protecting the privacy and personal data of its clients, employees, contractors and other stakeholders. This Data Protection and GDPR Policy outlines the Company's approach to data protection in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

### Scope

This policy applies to all personal data processed by the Company in the course of its business activities, including but not limited to data collected from clients, employees, contractors, and third-party suppliers.

### Definitions

The following definitions have been provided to assist in clarifying terms used in relation to Data Protection and GDPR:

- **Data Subject** - is you, i.e. the learner, the employer and/or the KEITS Ltd. employee or contractor.
- **Data Controller** – is an entity that determines the purposes, conditions and means of processing personal data. e.g. KEITS Ltd., Department for Education, Awarding Organisations/EPAOs & Ofsted, are all Data Controllers.
- **Data Processor** – is an entity which processes personal data on behalf of the controller e.g. KEITS Ltd., when we store, retrieve or forward personal data to another entity.
- **Who are the ICO?** – The Information Commissioners Office are the UK's independent authority set up to uphold information rights in the public interest <https://ico.org.uk>
- **Subject Access Requests** – Anyone has the right to know what information is held on them and companies have to respond to such a request within 30 days.

### Classification of types of data that may be held include:

- The **personal information** we collect may include your name, home address, email address, contact details.
- The **sensitive information** we may collect from you is your age, gender, NI number, passport number, driving licence number, bank details (depending on the nature of KEITS Ltd. engagement with you as an individual).

### Compliance with GDPR Principles

The Company is committed to upholding the following GDPR principles:

- Lawfulness, fairness, and transparency in data processing.
- Limitation of data processing to specified purposes.
- Data minimization, ensuring that only necessary data is processed.
- Accuracy and currency of data.
- Limitation of storage duration to necessity only.
- Integrity and confidentiality in processing and storage.
- Accountability, demonstrating compliance with GDPR principles.

## **Data Collection and Processing**

The Company will only collect and process personal data for specified, explicit, and legitimate purposes, including:

- Providing training and assessment services to clients.
- Managing employee and contractor relationships.
- Complying with legal obligations.

Personal data will be collected only to the extent necessary for the intended purposes and will be kept accurate and current.

## **Lawful Basis for Processing**

The Company will ensure that personal data is processed lawfully, relying on one or more of the following lawful bases:

- The data subject has given consent to the processing of their personal data.
- Processing is necessary for the performance of a contract with the data subject.
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary to protect the vital interests of the data subject or another individual.
- Processing is necessary for the legitimate interests pursued by the Company or a third party.

## **Data Security**

The Company will implement appropriate technical and organisational measures to ensure the security of personal data, including:

- Access controls to prevent unauthorised access.
- Encryption of personal data where appropriate.
- Regular monitoring and testing of security measures.
- Employee training on data protection and security best practices.
- Procedures for responding to data breaches in accordance with GDPR requirements.

## **Data Subject Rights**

The Company will respect the rights of data subjects under the GDPR, including:

- The right to be informed about the processing of their personal data.
- The right to access their personal data.
- The right to rectify inaccurate or incomplete personal data.
- The right to erasure of personal data ("right to be forgotten") under certain circumstances.
- The right to restrict processing of personal data under certain circumstances.
- The right to data portability, allowing data subjects to obtain and reuse their personal data for their own purposes.
- The right to object to processing of personal data in certain situations.
- Rights related to automated decision making and profiling.

## **Data Transfers**

Should the need ever arise, the Company will ensure that any transfers of personal data outside the European Economic Area (EEA) are done in compliance with GDPR requirements, including the use of appropriate safeguards such as Standard Contractual Clauses or binding corporate rules.

## Data Retention

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, taking into account any legal, accounting, or reporting requirements. Data that is no longer needed will be securely deleted or anonymised.

## Training and Awareness

The Company will provide training and awareness for employees to ensure they understand their obligations under GDPR and are equipped to handle personal data appropriately.

## Accountability and Governance

The Company's management is responsible for ensuring compliance with this Data Protection and GDPR Policy. The designated Data Protection Officer (DPO) will oversee data protection activities and act as a point of contact for data subjects and supervisory authorities.

## Review and Update

This Data Protection and GDPR Policy will be reviewed and updated regularly to ensure ongoing compliance with applicable data protection laws and any changes in the Company's operations or processing activities.

## Contact Information

For questions or concerns regarding data protection and GDPR compliance, please contact the Data Protection Officer [Sharon.Ward@keits.co.uk](mailto:Sharon.Ward@keits.co.uk).

Location	Title	Responsibility	Date Created	Version/updated	Review Date
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