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## GDPR Data Privacy Policy for

**HT Training Ltd**

**Registered company no. 06510989**

**Registered address: 73 Chelston Road, Ruislip Manor, Middlesex, HA4 9SA**

**(in accordance with the European General Data Protection Regulation GDPR)**

### INTRODUCTION

**This privacy policy provides you with details of how we collect and process your data.**

HT Training Ltd has data controller roles and responsibilities and we are responsible for your data.

You may contact us by emailing [rosemary@httraining.co.uk](mailto:rosemary@httraining.co.uk).

HT Training Ltd is a company registered in the UK, registration number 06510989.

Our registered office address is HT Training Ltd, 73 Chelston Road, Ruislip Manor, Middlesex, HA4 9SA.

HT Training Ltd is registered with the Information Commissioner's Office ([ICO](https://ico.org.uk/)), the UK regulatory body for data protection in the UK. You have the right to contact them in regard to any issues relating to the use of your data.

Should you have any questions about how HT Training Ltd processes your data, please email us at [rosemary@httraining.co.uk](mailto:rosemary@httraining.co.uk), and we will respond to you within ten working days, unless there are excessive, unreasonable or highly complex requests. In this instance we will contact you accordingly.

We would like to ensure that the information we hold about you is accurate and up-to-date, to ensure that we only use your data for relevant purposes.

In the context of GDPR legislation, we do not collect any Sensitive Data. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

### HOW WE USE DATA

The data that we hold relating to our clients and their staff is used within the lawful bases of CONSENT, CONTRACT, LEGAL OBLIGATION and LEGITIMATE INTEREST. By using our services, you confirm that you are happy for us to act as Data Controller for data on this basis.

We will only use your data when it is legally permitted. This may include:

- to fulfil any contract between us;
- where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation.

You have the right to withdraw your consent at any time by emailing us at [rosemary@httraining.co.uk](mailto:rosemary@httraining.co.uk).

## PURPOSES FOR PROCESSING YOUR DATA

Please see below the ways in which we may use your data and the lawful bases on which we will process the data.

Purpose	Lawful Basis
To manage our relationship with you which may include: <ul style="list-style-type: none"> <li>• telling you about changes to our services, terms and conditions and privacy policy;</li> <li>• advising you of new but related services that may be of interest to you;</li> <li>• to fulfil our terms of engagement with you</li> <li>• asking you to provide feedback in order to improve our own services.</li> </ul>	Contract Consent Legitimate Interest
Sharing with relevant organisations such as accountants, HMRC and other regulatory bodies	Legitimate Interest Contract Legal obligation
To work with providers of profiling, motivational and other tools which are integral to us providing the contracted services to you.	Contract Legitimate Interest Consent
To work with relevant data processors eg for marketing purposes	Consent

## DISCLOSURE OF YOUR DATA

We do not share or sell data to third parties.

We do use IT system providers in order to deliver our services and carry out appropriate audit measures to ensure that providers comply with GDPR legislation, and have appropriate security and data confidentiality measures in place.

We currently do not transfer or use any Data Processors outside of the European Economic Area, however, in the instance that we should do so, we will ensure that relevant safeguards are implemented in line with the guidance provided by the European Commission.

If we use providers in the United States, we will request evidence that they are part of the EU-US Privacy Shield which requires similar protection to GDPR.

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## DATA SECURITY

HT Training Ltd has implemented technical and procedural measures to protect your data. This includes standard operating procedures respected and insisted upon for our associate trainers, operational contractors, third party IT platform providers, platforms for our profiling tools and any contractors that may require access to information in order to fulfil their duties. They will only access and process your data in accordance with our instructions and are subject to our confidentiality agreement.

In the unlikely event of a data breach, we have a standard procedure in place and will advise you and the relevant authority where we are legally required to do so.

## HOW LONG WILL WE HOLD DATA

Your data will be held only for as long as is appropriate, required and is legally permitted. See our Document Retention Policy for details.

We will send you an email once per year to request that you review and update your details.

You can, of course, unsubscribe at any time by using the link at the bottom of all our emails and publications, or by emailing [rosemary@httraining.co.uk](mailto:rosemary@httraining.co.uk).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for business modelling purposes.

## YOUR RIGHTS

You have a legal right to the following:

- request a copy of the data that we hold about you;
- request an update or correction of your data;
- request that we remove your data;
- withdraw your consent to process your data.

Further information about your rights can be found at [www.ico.org.uk](http://www.ico.org.uk).

Data deletion requests will be actioned immediately unless it is required for any legal compliance reason. Thereafter it is your responsibility to retain relevant information and documentation.

Email requests will be actioned within a maximum of 10 working days. If there is any reason that this is likely to take longer, we will notify you and keep you updated. We may request additional information to speed up our response.