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## General Data Protection Regulation (GDPR)

### Overview Checklist Document

for

HT Training Ltd

Registered company no. 06510989

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

## INTRODUCTION

This document provides information about HT Training Ltd and the responsibilities, documentation, processes and procedures that it has implemented in order to comply with the European GDPR legislation that comes into effect on 25 May 2018.

GDPR applies to HT Training Ltd as it processes personal data about UK/EU residents. The company is registered with Companies House in the UK under the **Standard Industry Code (SIC) 82990 – Other business support service activities not elsewhere classified**. As such it has data controller responsibilities in its own right and on behalf of its clients.

In addition to this overview document, the following documents are used for the purposes specified and are available for inspection by relevant parties and authorities.

Any questions in regard to this document and the related information indicated below should be addressed to our Data Protection Officer and the business owner/director, Rosemary Bannister at [rosemary@httraining.co.uk](mailto:rosemary@httraining.co.uk).

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## DOCUMENTS:

1. GDPR Checklist (included in this document)
2. HT Training Ltd GDPR Data Inventory, Legitimate Interest & Impact Assessment
3. HT Training Ltd Data Protection Officer information
4. HT Training Ltd GDPR Document Retention Policy 1
5. HT Training Ltd GDPR Privacy Policy 1 (for clients/external)
6. HT Training Ltd GDPR Terms & Data Confidentiality Agreement (clients)
7. HT Training Ltd GDPR Privacy Policy for Associates & In-house Operational Contractors
8. HT Training Ltd GDPR Terms & Data Confidentiality Agreement (Associates & Operational Contractors)
9. HT Training GDPR Third Party Data Transfer Agreement

### HT TRAINING LTD GDPR CHECKLIST

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| Does GDPR apply to HT Training Ltd?  | <p>Yes. HT Training Ltd is based within the UK and handles data relating to its own operations and those of its clients.</p> <p>HT Training Ltd is a training and coaching company. It handles data relating to clients, suppliers, associates and clients' staff.</p>  |
| What data is processed by client?  | <p>HT Training Ltd handles:</p> <ul style="list-style-type: none"> <li>• Associate data,</li> <li>• supplier data,</li> <li>• client data,</li> <li>• client staff data.</li> </ul>   |
| What are the lawful bases for processing data?                             | <p>Consent<br/>Legitimate Interest<br/>Contract Fulfilment<br/>Legal Obligation</p>   |
| Does the client use third parties that have access to or process our data? | <p>Yes, for the following purposes:</p> <ul style="list-style-type: none"> <li>• IT and technical platform installation and maintenance;</li> <li>• organisations that provide profiling and other tools that are relevant to the fulfilment of contracts;</li> <li>• self-employed contractors who work as associate trainers for the business.</li> </ul>   |
| GDPR Privacy Policy  | <ol style="list-style-type: none"> <li>1. <i>HT Training Ltd GDPR Privacy Policy 1 (for clients/external)</i></li> <li>2. <i>HT Training Ltd GDPR Terms &amp; Data Confidentiality Agreement (clients)</i></li> <li>3. <i>HT Training Ltd GDPR Privacy Policy for in-house operational contractors and associates</i></li> <li>4. <i>HT Training Ltd GDPR Terms &amp; Data Confidentiality Agreement (in-house operational contractors and associates)</i></li> </ol>   |
| GDPR Privacy Policy Implementation   | <p>Relevant documentation has been sent to all relevant parties as follows:</p> <p><b>To clients:</b></p> <ol style="list-style-type: none"> <li>1. <i>HT Training Ltd Data Protection Officer information</i></li> <li>2. <i>HT Training Ltd GDPR Privacy Policy 1 (for clients/external)</i></li> <li>3. <i>HT Training Ltd GDPR Terms &amp; Data Confidentiality Agreement (clients)</i></li> <li>4. <i>HT Training Ltd GDPR Document Retention Policy</i></li> </ol> <p><b>To contractors/staff:</b></p> <ol style="list-style-type: none"> <li>1. <i>HT Training Ltd GDPR Privacy Policy for in-house operational contractors and associates</i></li> <li>2. <i>HT Training Ltd GDPR Terms &amp; Data Confidentiality Agreement (in-house operational contractors and associates)</i></li> </ol> |

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| Management of information deletion requests | Will be handled in accordance with: <ul style="list-style-type: none"><li>HT Training Ltd GDPR Privacy Policies and HT Training Ltd GDPR Terms &amp; Data Confidentiality Agreements</li><li>HT Training Ltd GDPR Document Retention Policy</li></ul>  |
| Requests for information by data subjects   | Providing this is a relatively straightforward request, the information will be provided within 10 days maximum. Complicated requests may take longer, and we may require further details from the subject in order to provide all requested details. The subject will be kept informed at all times and provided with an approximate timescale. |
| Data Protection Impact Assessment           | See <i>HT Training Ltd GDPR Data Inventory, Legitimate Interest &amp; Impact Assessment</i>  |
| Process for data breach                     | See <i>HT Training Ltd GDPR Data Inventory, Legitimate Interest &amp; Impact Assessment</i> . Serious data breaches will be recorded and escalated within 24 hours to the Data Protection Officer, who is responsible for handling the breach, impact, any required reporting to the Information Commissioner's Office and remedial action.      |
| Data Retention Policy                       | <ul style="list-style-type: none"><li>See <i>HT Training Ltd GDPR Document Retention Policy</i></li></ul>  |
| Register with the ICO?                      | Registered 14 <sup>th</sup> June 2018  |