

**Data Protection**

**Privacy Policy**

**Websters GM Ltd**

Data protection

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we process personal data.

We have policies, procedures and training in place to help our employees and volunteers understand their data protection responsibilities and follow the data protection principles.

We have a nominated member of staff who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email [insert your data protection lead’s email address]

This privacy policy relates to our use of any personal information we process about you.

How we collect personal data

We may collect your personal data in different ways, for example:

* when you communicate with us by post, telephone, SMS, email or via our website
* from the information you provide to us when you make an application to work for us, or from third parties such as your previous or current employers so we can verify details about you
* as you interact with us in other ways; as a contractor, or in any other capacity

How we use personal information

We collect and use personal information about our staff, customers, suppliers and job applicants for different purposes:

General Administration of the business

Payroll

We only collect personal information that we genuinely need.

This may include:

* Contact details such as name address, email address and phone number
* Date of birth and gender
* Any Special Educational Needs (SEN) requirements for exams including relevant medical records
* Qualifications
* Name and contact details of any next of kin in appropriate

Informing Customers about products and services

If you opt in to our mailing list we will use the information that you provide to email and post you information about our events, courses, our services and other items of interest. You can opt out or unsubscribe from receiving this information at any time if you wish. Our legal basis for using your personal information in this way is consent.

Dealing with complaints and appeals

If a complaint or an appeal is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal. This may include sharing relevant information depending upon the nature of the complaint and the area it relates to. Our legal basis for using personal information for this purpose is to fulfil our legitimate interest and fulfil our objective of resolving complaints in a careful and appropriate manner.

Processing expenses/Paying Invoices/Paying salary and wages

We will use your personal information including your bank account details. Our legal basis for using your information for this is for the performance of a contract.

Cookies and aggregate information collected from [www.webgm.co.uk](http://www.webgm.co.uk) We use cookies and log files on our website to store information about how you use our website. A cookie is a piece of data stored on the user’s computer tied to information about the user.  This enables us to create a profile which details your viewing preferences. We use your profile to tailor your visit to our website, to make navigation easier and direct you to information that best corresponds to your interests and country.

Aggregate information is collected from users using our own web tracker. This information includes users' Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages and number of unique visits.

This information is not linked to personal profiles or to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer the website and to gather broad demographic information of our website users. Our legal basis for using your information in this way is for our legitimate interest.

Our legal basis for processing personal information

Our legal basis for the purposes that we process personal information is for the performance of a contract, or for our legitimate interests or consent.

We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract).

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

We will ask for your consent to send you marketing emails and text messages. You can withdraw consent for this at any time.

Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details with the emergency services if we believe it is in your ‘vital interests’ to do so. For example, if someone is taken ill during one of our events.

Sharing personal information

We will only share your personal information where we are required to fulfil our contract with you, or legitimate interest, where we have your consent, or we are required to do so by law.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers.

If necessary, we may also share your information with caterers, course providers, referees, and coaches.

We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.

Where required, we will process personal information to comply with our legal obligations. In this respect we may use your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

Your rights

If you no longer wish to receive communications about products and services from us, please contact donna@webgm.co.uk. You can also unsubscribe at any time to emails that we may send to you about the products and services that we think will be of interest to you.

You also have the right to:

* Request a copy of the information we hold about you. Requests should be addressed to donna@webgm.co.uk. We will respond within 30 days of receiving your written request.
* Tell us to change or correct your personal information if it is incomplete or inaccurate. Please contact us at donna@webgm.co.uk
* Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information. Please contact us at donna@webgm.co.uk
* Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation. Please contact us at donna@webgm.co.uk .
* Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you. Please contact us at donna@webgm.co.uk .

Please note that we may be entitled to refuse requests where exceptions apply: for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

How long we keep your personal information

We will hold your personal information for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes.

Changes to this policy

This Privacy Policy may change from time to time. Where practical we will provide you with an updated Privacy Policy from time to time. However, we also recommend that you please visit this webpage periodically to keep up-to-date with the changes in our Privacy Policy.

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: **0303 123 1113.**