GENERAL DATA PROTECTION REGULATIONS POLICY

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POLICY

The law requires compliance with the principles of the Data Protection Act 2018 (the DPA) and the GDPR. This policy sets out how Alphabet Training deals with employees' personal data and employees' obligations in relation to any personal data that they may handle.

In this policy, Alphabet Training is the Data Controller and Data Processor and any individual who provides their information to Alphabet Training is the Data Subject.

The Data Protection Officer ("DPO") is responsible for ensuring compliance with the Act and with this policy. Shabir Siddiq holds that post. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the DPO.

A working party is set up and is composed of the Manging Director, (legal Advisor – if required), Data Protection Officer under the supervision and leadership of the MD in pursuant to Article 29 of the GDPR for the purpose of monitoring, reviewing, assessing and managing compliance with the Data protection within the Company.

FREQUENTLY USED TERMS

Personal data means any information relating to an identified or identifiable natural person ("Data Subject").

Sensitive personal data means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sex life and sexual orientation, genetic or biometric data.

Processing means any operation performed on personal data whether or not by automated means or otherwise.

Data Controller means the natural or legal person, public authority, agency or any other body which alone or jointly with others determine the purpose and means of processing of personal data.

Data Processor means the natural or legal person, public authority, agency or any other body which processes the data on behalf of the controller.

DATA PROTECTION COMPLIANCE

Alphabet Training will comply with the eight principles of data protection. These ensure that personal data must be:

- Processed lawfully.
- Processed for limited purposes and in appropriate way.
- Adequate, relevant and not excessive for the purpose.
- Accurate.

- Not kept longer than necessary for the purpose.
- Processed in line with data subjects' rights.
- Secure.
- Not transferred to people or organisations situated in countries without adequate protection.

Lawful basis for processing information/data

The lawful bases for processing your data are set out in Article 6 of the UK GDPR. Alphabet Training data collection and processing are based on the following:

- **(a) Consent:** the individual has given clear consent to process their personal data for a specific purpose.
- **(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

HOW AN INDIVIDUAL'S DATA IS USED

Information is kept on file about an individual with their consent for the performance of the employer-employee relationship and for the execution of your regulatory duties. The information held is to protect an individual's vital interests such as ensuring regular payment of your salary, making statutory or contractual deductions to comply with statutory requirements such as HMRC, DWP, Home Office, and for the management and administration of our business. This information is kept to run the business and manage the relationship with the individual effectively, lawfully and appropriately, from the time they first apply for a job / course, whilst they are working / learning with us, at the time when their employment / learning ends and after they leave. This includes the usage of information to comply with Alphabet Training's contractual obligations and to protect Alphabet Training's legal position in the event of claims against us. Much of the information Alphabet Training holds will have been provided by you, but some may come from other internal sources. You have a right to access your personal file kept by the HR Department.

INFORMATION HELD ABOUT YOU

The sort of information held by Alphabet Training includes:

- Application form and references.
- Contract of employment / statement of employment particulars and any amendments to it.
- Correspondence with or about you. For example, letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary.
- Information needed for payroll, benefits and expenses purposes.
- Contact and emergency contact details.
- Records relevant to your right to work in the UK.
- Records of holiday, sickness and other absences.
- Records relating to your career history such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

An individual may be referred to in many company documents and records which are produced whilst carrying out their duties as an employee / learner.

Where necessary, information may be kept relating to one's health. This information might include reasons for any absences and doctor's reports and notes, and will be used for the following:

- To comply with health and safety.
- To manage sickness absence and to consider how one's health affects one's ability to do their job and whether any adjustments to their job might be appropriate.
- To administer and manage statutory company sick pay and pension.
- To monitor computer and telephone / mobile telephone use.

A CCTV system monitors the exterior of the building and details of other areas, e.g. the car park, the reception area. Images are recorded and retained for a limited period of time. This is primarily for security purposes, although in rare cases CCTV footage may be used in investigations in relation to allegations of misconduct by employees. For example, if a fight or vandalism is alleged to have taken place outside the building.

Records of an employee's hours of work by way of signing in and signing out will also be kept.

Images and/or video footage of employees may be used for the promotion of Alphabet Training's business activities and for marketing and advertising purposes.

WHEN INFORMATION IS GIVEN TO THIRD PARTIES

Information about an individual may be given to third parties. For example:

- If Alphabet Training is legally obliged to do so.
- To comply with Alphabet Training's contractual duties.
- To contractors who carry out some of Alphabet Training's functions, such as to run IT systems or payroll functions.
- Where Alphabet Training transfers information about an individual to other group companies for purposes connected to career or the management of the company's business.
- Upon an individual's request.

ACCURATE DATA

Alphabet Training will ensure that personal data which is held about an individual is accurate and up to date. Alphabet Training will take all reasonable steps to destroy or amend inaccurate or out-of-date data. You have a right to amend and or update your personal data or request us to remove the data subject to safeguarding our legitimate interests and statutory duties.

DATA RETENTION

Alphabet Training will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. Alphabet Training will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required. This is normally six years.

For guidance on how long certain data is likely to be kept before being destroyed, contact the DPO.

PROCESSING IN LINE WITH YOUR RIGHTS

Alphabet Training will process personal data in line with your rights, in particular:

1. The right to be informed.
2. The right of access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. The right not to be subject to automated decision-making including profiling.

DATA SECURITY

Alphabet Training will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

Alphabet Training will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a third party if it agrees to comply with those procedures and policies, or if it puts in place adequate measures itself.

Alphabet Training will maintain data security by protecting the confidentiality, integrity and availability (for authorised purposes) of the personal data.

ACCESSING YOUR PERSONAL DATA

If you wish to access personal data Alphabet Training holds about you under the Subject Access Request provision, please write to the HR office or the DPO.

OBLIGATIONS REGARDING DATA PROTECTION

Everyone has rights with regards to the way in which their personal data is handled. During the course of the company's activities, Alphabet Training will collect, store and process personal data not only about our employees but also about our customers, suppliers and other third parties.

Employees are obliged to comply with data protection law and the data principles set out above when processing personal data as part of their duties. In particular, they are obliged to comply with the following provisions and / or any other guidelines produced by the company relating to personal data and/or any other management instructions.

If you are in any doubt about what to do with personal information, you should seek advice from Shabir Siddiq (Data Protection Officer, “DPO”).

Any breach of these obligations may result in disciplinary action.

If you acquire any personal data in the course of your duties, you must ensure that the use of the information is for a legitimate purpose and that it is not kept longer than necessary.

If you acquire any personal data in the course of your duties, you must ensure that the information is accurate and up to date, insofar as it is practicable to do so.

For your obligations in relation to document security, you should ensure that you:

- Use password-protected and encrypted software for the transmission and receipt of emails.
- Lock files in a secure cabinet.
- Do not remove or take any company information away from the company’s premises, or access such information on personal devices, except where you have obtained the prior consent of from the DPO or any such authorised person.
- Do not leave your laptop, other device or any hard copies of documents in a public place and that you take care when observing the information in hard copy or on-screen that such information is not viewed by anyone who also has the right to that information.

Where information containing personal data is disposed of, you should ensure that this is done securely. This may involve:

- permanent removal of information from the server (so that it does not remain in your inbox or trash folder).
- shredding hard copies of confidential information.

If you receive personal information in error by whatever means, you must inform the authorised person or DPO immediately.

Complaints

If you are concerned about how your personal information has been handled/processed, or if you feel any infringement has taken place. In the first instance, please contact the Alphabet Training Data Protection Officer.

Alphabet Training Data Protection Officer – Shabir Siddiq

Tel: 01254 679998, email: Shabir@alphabet-training.co.uk

You have the right to raise a complaint with the Information Commissioners Office (ICO), details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

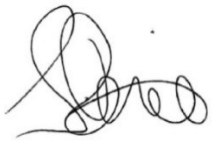
Or you could visit the ICO website and follow the online process. Website address below:

https://ico.org.uk/make-a-complaint/

STATUS OF THIS POLICY AND NEW INSTRUCTIONS

This policy is for general purposes only and does not grant any contractual rights as such. Alphabet Training reserves the right to amend this policy from time to time, although we will notify you in writing of any changes.

Signed by the Managing Director



01/08/2026