NAS TAC LTD & Estate Escapes

GDPR 2018 – Fact Sheet

This document aims to outline and simplify how we process your personal data and our reasons for doing so, in line with the new GDPR legislation that replaces the current Data Protection Act. Under the new legislation it is a requirement that you understand how your data is to be used and that there is a legal basis for doing so i.e. consent. GDPR also adds additional protections for our young people. For example, only young people over 13 (we’re opting for 16) can consent to sharing their information, under this age you need to have parental consent.

It is important to us that you understand your right to access your personal data that we hold, your right to erasure and your right to object to processing. All of which can be achieved by simply writing to us (email) and submitting a request.

Legal basis for processing personal data:

Consent:

* We must secure consent in order to use personal information. Consent may be assumed for the purpose of processing orders as you have openly supplied your shipping details in order to receive your order.
* However, we may not assume consent for use in our marketing efforts and must confirm consent via a relevant and appropriate form.

Rationale for processing personal information:

1. Retail

* In order to fulfil orders, we must process personal information such as names, addresses, email addresses – for confirmation emails etc – and contact numbers,
* We may process and store email addresses and physical addresses for our own marketing efforts. This information would never be shared outside of our organisations and participants are free to opt out at any time.

1. Training

* It is a requirement for us to process and store personal information in order to fulfil our duty to our awarding bodies who oversee and accredit the courses our clients sign up to. Without this personal information we could not register learners and award qualifications.
* We may share data to self employed instructors or they may be involved in the collection of personal data. They are acting on our behalf and are required to follow our policies and procedures at all times. Without doing this it would be difficult to run our courses and activities.
* Some activities will require parental consent and basic medical history i.e. current medications and historic major incidents that could affect the safety of the activity. We will have to store this data for seven years to protect ourselves against any actions brought against us. After this period, we would dispose of the data.

Storing and Processing Information:

Due to the rationale highlighted above it is a requirement that we process and store information. As well as it being a requirement, we also feel it is important to ensure the safety and security of all the information we process and store and as such we want to be transparent in our processes and practices in relation to your data.

Processing:

* At the very core of information processing we use computers and iPads, all of which are required to be password protected and are never left unlocked or even unattended. They all have appropriate antivirus and are updated frequently to ensure they all have up to date security patches to avoid exploitation. Paper form documents are locked in a secure and alarmed office and within a locked filing cabinet.
* We use third party ecommerce platforms such as Shopify, eBay and Amazon to process orders. We take your shipping details, import them into some software called Dynamo and print your shipping label. We do not save shipping details during this process. Each platform may save your information and as such they will have their own GDPR policies. If you consent to signing up to marketing so we can keep in touch through these platforms we may use your email address for targeted marketing purposes. Again these marketing campaigns are operated directly from these platforms.
* If we have your consent to send marketing materials to your email address, we may use MailChimp to support our email marketing campaigns by creating mailing lists. MailChimp use secure servers and so we have confidence that your data is secure and all we include is name and email address, no shipping details are included. You can opt out at the bottom of every email.

Storing:

* Due to our obligations to our awarding bodies we must keep records. This is a lot of paperwork and we want to be as green as possible so we try to use digital copies as much as possible. If not, we scan documents in. This means we need to digitally store documents instead of having a vast file room. To do this we use cloud services as we prefer their redundancy and contingency. The services we use are Google Drive and One Drive. Both are password protected and encrypted and we would never place any compromising data on the services if we didn't feel it appropriate, though as outlined in our rationale, we don't really need compromising data.
* Some of our documents such as training records, assessments and fay registers are required to be stored for at least five years. At the end of this period we would evaluate the need to keep the documents and dispose of accordingly, whether that be to digitally delete or shred.

Information Sharing:

* Due to the nature of our business we are obliged to pass personal details on to some of our ‘partners’ to enrol and award you with the courses and qualifications you have signed up to. You would be made aware of who will receive your data during your course. In addition, on our course listings the awarding body is listed. For example, if you enrol on a First Aid at Work, accredited by ITC First, we would need to share your data with ITC first in order to enrol you and accredit you.
* When we post your orders, the courier will require your shipping address. For certain services that include tracking a phone number and/or email address will be required. Once passed on, your data is subject to the couriers’ policies so please check before selecting the service.
* First aid incidents: We would seek your consent by getting you to sign the accident report form. The only time we would share any data from an incident would be at the request of the police or the courts as we have no power to refuse. However, we would ensure you have been informed of the sharing of data if you’re not already aware.

Opting Out:

* To opt out of our marketing and us holding your data, all you need to do is click on ‘Opt Out’ at the bottom of our emails or send us an email to [nastacltd@gmail.com](mailto:nastacltd@gmail.com) expressing your wish to be removed.
* On receipt, we would take steps to delete your data from any of our platforms if you have not done so already and you would then no longer receive communications.
* Some of the data we hold cannot be disposed of as it would invalidate any qualifications you have received from us. We would write to explain this to you and if you still wanted the data deleted you would need to contact the appropriate awarding body and have them contact us with permission to dispose of your records. We can supply contact details on request.

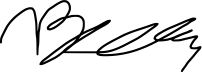
Document Tracking and Disposal Records:

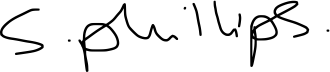
* All physical documents containing personal information will include or have attached a tracking table. This allows us to keep a record of who has had access to the information within our organisation and when.
* When we dispose of documents containing personal information we will keep a record including a description of the destroyed documents, the date, location and person responsible for destroying the documents.

Data Breaches:

* Though we intend to avoid any such situation and we don’t hold compromising data, it would be naive to suggest that the is no possibility of data breaches. In the event of a data breach we will aim to alert all persons who could be affected within five days.
* We will also inform the police and the ICO of the breach within 72 hours so they can investigate and prevent recurring attacks. We would then aim to keep users up to date with the situation and advise on the best course of action.

All of our policies are available at <http://nastactraining.weebly.com/policies--docs.html> or on written request to [nastacltd@gmail.com](mailto:nastacltd@gmail.com)





Managing Director Marketing Director