

Contents	Page 1
Introduction	Page 2
Overview	Page 2
Who does this policy apply to?	Page 2
Who is responsible for data protection at TTE?	Page 3
Why is data protection compliance important?	Page 3
What is personal data?	Page 3
What does processing data mean?	Page 3
Data Protection Obligations	Page 3
Process personal data in a fair, lawful and transparent manner	Page 4
Taking extra care when handling sensitive or special categories of personal data	Page 5
We only process personal data for specified, explicit and legitimate purposes	Page 6
Promotional communication - marketing	Page 7
Make sure that personal data is adequate, relevant and limited to what is necessary for our legitimate purposes	Page 7
Keep personal data accurate and where necessary up to date	Page 8
Keep personal data for no longer than is necessary for the identified purposes	Page 8
Take appropriate steps to keep personal data secure	Page 9
Our service providers and suppliers	Page 10
We don't transfer personal data to another country unless there are appropriate safeguards in place	Page 11
Report any data protection breaches without delay	Page 12
Do not use profiling or automated decision – making unless we are authorised to do so	Page 13
Individual Rights and Requests	Page 13
Integrated data protection into operations	Page 15
Training	Page 15
Complaints	Page 15

Introduction

This is the Policy of The TTE Technical Training Group (TTE) and Subsidiaries, registered at Edison House, Middlesbrough Road East, Southbank, Middlesbrough, TS6 6TZ, United Kingdom.

TTE is committed to data security and the fair and transparent processing of personal data. This data protection policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

Overview

At TTE we collect and process information about individuals (i.e. 'personal data') for business purposes, including employment and HR administration, provision of our services, marketing, and business administration. This includes personal data relating to our staff, learners, customers, suppliers and other third parties. TTE is committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. TTE is also dedicated to being transparent about what data we collect about you and how we use it.

If you are a candidate for a TTE qualification (or a qualification that we are accredited with Awarding Organisation to deliver), we will collect personal information about you that is relevant to your educational journey, the qualification you are studying for and the assessment of your performance in respect of that qualification. This would include, for example, the marking of examinations, post examination procedures (such as checking and appeals) and the final award of qualifications.

TTE is a controller under data protection law, meaning it decides how and why it uses personal data. This Policy explains our procedures for complying with data protection law in relation to personal data. It also sets out your obligations whenever you are processing any personal data in the course of your employment.

All our staff that routinely handle individuals' personal data will be given specific training and instructions regarding data protection procedures in relation to particular role and department. These instructions will supplement obligations as set out in this Policy.

There will also be other policies which will impact on how we deal with personal data and data protection. The main ones are our Information Communication Policy, Documented Information of the BMS Policy BMS Section 16, and we expect staff to comply with these where relevant.

Who does this Policy apply to?

This Policy applies to all TTE Technical Training employees, contractors, commercial customers, learners, agency workers, consultants, volunteers, partners / guardians and directors.

Who is responsible for data protection at TTE?

The Board is ultimately responsible for TTE Technical Training's compliance with applicable data protection law.

All Employees at TTE have some responsibility for ensuring that personal data is kept secure and processed in a lawful manner although certain Employees will have particular responsibilities, of which they will be aware and in respect of which they may receive specific instructions.

If you are in any doubt about how you should handle personal data, or if you have any concerns or questions in relation to the operation (or suspected breaches) of this Policy, you should seek advice from your line manager, Compliance department or you can email gdpr@tte.co.uk.

Why is data protection compliance important?

Data protection law in the UK is regulated and enforced by the Information Commissioner's Office (ICO). Failure to comply with data protection law may expose TTE and, in some cases, individual Employees to serious legal liabilities. These can include criminal offences and fines of up to EUR20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher. In addition, an individual may seek damages from us in the courts, if we breach their rights under data protection law. Breaches of data protection law can also lead to serious damage to our brand and reputation. In addition to the legal liabilities, failure to comply with obligations under this Policy could lead to disciplinary action and, in serious cases; it could result in the termination of employment.

What is personal data?

Personal data means any information relating to any living individual (also known as a 'data subject') who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features). Relevant individuals can include your colleagues, consumers, members of the public, business contacts, learners etc. Personal data can be factual (e.g. contact details or date of birth), an opinion about a person's actions or behaviour, or information that may otherwise impact on that individual. It can be personal or business related.

Personal data may be automated (e.g. electronic records such as computer files or in emails) or in manual records which are part of a filing system or are intended to form part of a filing system (e.g. structured paper files and archives).

What does 'processing' personal data mean?

'Processing' personal data means any activity that involves the use of personal data (e.g. obtaining, recording or holding the data, amending, retrieving, using, disclosing, sharing, erasing or destroying). It also includes sending or transferring personal data to third parties.

Data Protection Obligations

TTE is responsible for and must be able to demonstrate compliance with data protection law. To ensure that TTE meets its responsibilities, it is essential that its Employees comply with data protection law and any other policies, guidelines or instructions relating to personal data when processing personal data in the course of their employment.

We have set out below the key obligations under data protection law and details of how TTE expects Employees to comply with these requirements.

1. Process personal data in a fair, lawful and transparent manner

Legal grounds for processing

Data protection law allows us to process personal data only where there are fair and legal grounds which justify using the information.

Examples of legal grounds for processing personal data include the following:

- Complying with a legal obligation (e.g. health and safety or tax laws);
- Entering into or performing a contract with the individual (e.g. an Employee's terms and conditions of employment, or a contract for services with an individual customer);
- Acting in TTE's or a third party's legitimate interests (e.g. maintaining records of business activities, monitoring business productivity); and
- Obtaining the consent of the individual (e.g. for sending direct marketing communications).
- Network security – as specified in our IT governance policies to protect customers and learners data from abuse by registered users.
- Personalisation – analytics to inform on our marketing strategy
- Evidential purposes associated with the CCTV system.
- Employee relations to provide information to book business travel
- Direct marketing to provide update on details of activities and upcoming events
- Web analytics to support our social media posts, page views, reviews, followers, etc.
- Hosting data in the cloud – using cloud based data services.

Where consent is relied upon, it must be freely given, specific, informed and unambiguous, and TTE must effectively demonstrate that consent has been given.

In line with ICO guidance regarding the employer/Employee relationship, TTE does **not** use consent as a legal ground for processing Employee data unless the data processing activities concerned are genuinely optional.

In most cases, consent is also not required for other standard business activities involving use of customer or supplier data, but it may be needed for activities which are not required to manage the main business relationship, such as direct marketing activities.

We will never process your data where these interests are overridden by your own interests.

Transparency

Data protection law also requires us to process personal data in a transparent manner by providing individuals with appropriate, clear and concise information about how we process their personal data.

We usually provide individuals with basic information about how we use their data on forms which collect data (such as application forms or website forms), and in longer privacy notices setting out details including: the types of personal data that we hold about them, how we use it, our legal grounds for processing the information, who we might share it with and how long we keep it for. For example, we provide information about our processing of Employees' personal data in TTE's Employee Privacy Notice, Customer Privacy Notice and Learner Privacy Notice.

We supplement these notices, where appropriate, with reminders or additional information at the time particular processing activities take place or become relevant for an individual (for example when they sign up for a new service or event).

The standard privacy notices and statements that we issue, for example, to Employees, customers and the public, should normally be sufficient to ensure that individuals have appropriate information about how we are handling their personal data in the course of your employment. However, we will consider whether reminders or additional information may be appropriate at the time particular processing activities take place. This is particularly important if we think that individuals may need further assistance to understand clearly how their data will be used as part of such activities.

Any new forms which collect personal data and any proposed consent wording must be approved in advance by the EDT/SMT in conjunction with the Compliance Department.

If you have any concerns about the legal grounds for processing personal data or if you are unsure whether individuals have been provided with appropriate information (in particular in relation to any new processing activities), please check with your line manager or contact gdpr@tte.co.uk

2. Taking extra care when handling sensitive or special categories of personal data

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so on the basis of your explicit consent.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy.

Where special category personal data is concerned, data protection law requires us to have (as well as one of the legal grounds described in section 1), an additional legal ground to justify using this sensitive information. The appropriate legal ground will depend on the circumstances.

Additional legal grounds for processing special category data include the following. Those marked with an asterisk (*) would be particularly relevant to processing Employees' special category personal data:

- Complying with a legal obligation/exercising a legal right in the field of employment*;
- Assessing working capacity (based on expert medical opinion, and subject to obligations of confidentiality)*;
- Carrying out equalities monitoring in relation to racial or ethnic origin, religious beliefs, health or sexual orientation*;
- Exercising, establishing or defending legal claims*;
- Preventing or detecting unlawful acts; or
- Explicit consent of the individual. (As well as the requirements for consent outlined in section 1 above, this requires an express statement from the individual that their special category of data may be used for the intended purposes.)

What we do?

When handling special category personal data in the course of our activities we will take extra care regarding compliance with data protection law. In particular, try to ensure that:

- Any processing activities are strictly in accordance with our duties and TTE's instructions;
- There are appropriate legal grounds for processing the data (both basic grounds under section 1 and additional grounds under section 2) which have been assessed for your specific activities;
- Individuals have received adequate information regarding how their data is being handled. In some cases an existing privacy notice may need to be supplemented with more specific information regarding special category data (e.g. when TTE is managing sickness absence and/or making adjustments to job duties for Employees with disabilities or serious illness, we may provide additional ad hoc privacy notices to supplement the Employee Privacy Notice);
- We apply additional security and confidentiality measures, taking into account that the impact on individuals of loss or misuse of their special category data may be greater than with other types of data. See also section 7 below; and
- If we are relying on consent as a legal ground for processing, we obtain advance approval of any consent wording from the Compliance department.

We are routinely handling special category data as part of the requirements of our role and duties. TTE will ordinarily have put in place procedures which ensure that our processing activities satisfy the requirements above.

However, if alternative circumstances apply (we are involved in a new project or updating an existing system which involves new types of processing of special category data), please contact gdpr@tte.co.uk to ensure that the correct compliance procedures are followed.

Similarly, if you have any concerns over the legal grounds that apply when we are processing special category data or the appropriate information to be provided to individuals, please get in touch with gdpr@tte.co.uk

3. We only process personal data for specified, explicit and legitimate purposes

TTE will only process personal data in accordance with our legitimate purposes to carry out our business operations and to administer employment to provide required training and other business relationships.

We will only use the personal data that we process in the course of our duties for TTE's legitimate and authorised purposes. We won't process personal data for any purposes which are unrelated to our activities.

Processing personal data for any incompatible or unauthorised purpose could result in a breach of data protection law (e.g. using the company contacts database to find out a colleague's home address for private, non-work related purposes). This may have potentially damaging consequences for all parties concerned, including disciplinary action.

If we find that we have processed personal data for a different purpose from that for which it was originally collected, we will check whether the individuals have been informed and, if not, consider whether the additional purpose is legitimate (in the context of TTE's business activities) and compatible with the original purpose.

If you are unsure about whether the purposes for processing are legitimate, you should contact the Compliance Department or gdpr@tte.co.uk before going ahead with processing the data for the additional purpose.

Promotional communications - marketing

We use your information to inform you of our product and services with your consent, to administer our business activities, to provide customer service and to make available other products and services to our customers and potential customers. You may opt out of receiving this information at any time by sending an e-mail to gdpr@tte.co.uk.

TTE aims to update you about courses which are of interest and relevance to you as an individual.

If you visit our website, we may automatically collect the following information:

We use your information to improve our marketing, to administer our business activities, to provide customer service and to make available other products and services to our customers and potential customers. You may opt out of receiving this information at any time by sending an e-mail to gdpr@tte.co.uk.

We will show the information you provide only to those employees that need to see it.

We also use information in aggregated form (where no individual user is identified). This information may include:

- The URL which you came from.
- The URL which you came from.
- What browser you are using.
- Your IP address.

This information is used for market research and to customise our site content. We believe that this allows us to monitor and improve our site and tailor it to better meet our users requirements.

Use of Cookies

Cookies are small pieces of data that are stored on a user's hard drive. Cookies can remember what information a user accesses on one web page to simplify subsequent transactions or to short cut access to the site. We use cookies to gather information about our users' browsing activities. This information helps us to design and arrange our site in the most user-friendly manner. You can usually modify your browser to prevent this happening.

4. Make sure that personal data is adequate, relevant and limited to what is necessary for our legitimate purposes

Data protection law requires us to ensure that, when we process personal data, it is adequate, relevant to our purposes and limited to what is necessary for those purposes (also known as 'data minimisation'). In other words, we ask for the information we need for our legitimate business purposes, but we won't ask for more information than we need in order to carry out our business operations.

What we do?

We will try to ensure that we only acquire and process the personal data that we actually need for TTE's legitimate and authorised purposes within the scope of your activity.

We must ensure that we have sufficient personal data needed to be able to use it fairly and to take into account all relevant details.

By creating forms that collect personal data, we should be able to justify why each specific category of data is being requested.

We must also comply with TTE's instructions about data retention and storage, ensuring that personal data is only kept for as long as it is needed for any intended purpose.

5. Keep personal data accurate and (where necessary) up-to-date

TTE must take steps to ensure that personal data is accurate and (where necessary) kept up-to-date. For example, we request that Employees provide us with any change in contact details or personal information via Personal Details forms. We also take care that decisions impacting individuals are based on accurate and up-to-date information.

What we do?

You must make reasonable efforts to be accurate and, where necessary, keep the relevant information updated.

When collecting any personal data we will try to confirm its accuracy at the outset. If we subsequently discover any inaccuracies in the personal data that we are handling, these need to be corrected or deleted without delay.

How can you help?

If you are parent/guardian, commercial customer, employee, learner please let us know immediately about any personal data changes that are relevant to your employment or training.

We will keep personal data in as few places as possible to avoid the risk that duplicate copies are not updated and become out of sync. We will not create additional copies of personal data, but will work from and update a single central copy where possible (in accordance with standard company procedures on retention and storage of records).

6. Keep personal data for no longer than is necessary for the identified purposes

Records containing personal data will only be kept for as long as they are needed for the identified purposes. TTE has in place internal processes/guidelines regarding various types of company records and information that contain personal data.

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us or by emailing gdpr@tte.co.uk

We take appropriate steps to retain personal data only for so long as is necessary, taking into account the following criteria:

- The amount, nature, and sensitivity of the personal data;
- The risk of harm from unauthorised use or disclosure;
- The purposes for which we process the personal data and how long we need the particular data to achieve these purposes;

- How long the personal data is likely to remain accurate and up-to-date;
- For how long the personal data might be relevant to possible future legal claims; and
- Any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept.

Please familiarise yourself with our retention table.

If you are not sure what retention guidelines/instructions apply to you in your role, or you are unsure of how to apply them to a particular type or item of personal data, please contact gdpr@tte.co.uk or refer to our data retention table.

7. Take appropriate steps to keep personal data secure

Keeping personal data safe and complying with TTE's security procedures to protect the confidentiality, integrity, availability and resilience of personal data is a key responsibility for TTE and its workforce.

TTE has an Information Security Policy, which sets out its organisational and technical security measures to protect information, including personal data, physical, technological and organisational controls, e.g. locked filing cabinets, building security, information subject to access controls and passwords, reliability checks on/confidentiality obligations of Employees, encryption of hardware or software, anti-virus and network protection, software updates, security testing and incident management, secure disposal of records and equipment, backup and disaster recovery, remote working procedures, protocols on use of technology and data storage, asset registers, email encryption, any mobile devices have extra mobile security for access.

TTE only will share your personal data with the relevant people / organisations as indicated in this policy. We will also regularly review Awarding Organisations websites and 3rd parties to ensure they contain relevant privacy notices that are compliant with legislation. TTE's contractual documentation with subcontractors expressly states that subcontractors must be compliant with legislation around Data Protection.

TTE also has an Information Communication Technology Policy Documented Information of the BMS Policy BMS Section 16 which also helps to ensure appropriate security of personal data stored or communicated using such internal systems.

We regularly evaluate and test the effectiveness of these measures to ensure the security of our personal data processing activities as carried out by our information security team.

What we do?

TTE in maintaining data security and protecting the confidentiality and integrity of the personal data we handle in course of our activities, we comply with this Policy, our Information Security Policy, our Technology and Communications Policy and Documented Information of the BMS Policy BMS Section 16 and any TTE instructions regarding the processing and security of personal data.

These might include things like:

- Save, store and communicate personal data only within or using authorised TTE information and communications systems. Restrict storage of personal data on personal devices or using personal communications facilities.
- Use password-protected and encrypted software for the transmission and receipt of emails.
- Lock files in a secure cabinet (employee, learner, third party, consumer details).
- Never leave laptops, other device or any hard copies of documents containing personal data in a public place.
- Take care when observing personal data in hard copy or on-screen that such information is not viewed by anyone who does not have the right to that information, especially if viewing the personal data in a public place.
- When storing data on portable devices such as laptops, smartphones, or USB drives, ensure that the device is encrypted and password protected.
- Ensure that information containing personal data is disposed of securely and permanently, using confidential waste disposal or shredding where necessary.
- Alert gdpr@tte.co.uk to any personal data breaches immediately (see below for further details about personal data breaches).
- Ensure that any sharing or disclosure of personal data is permitted on appropriate legal grounds and, where necessary, safeguards are in place (see below for further details of safeguards regarding overseas transfers or if sharing personal data with third party service providers).

8. Our service providers and suppliers

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include Partner Colleges, Awarding Organisations, service providers. TTE only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. Employees of TTE who have a requirement to know your information so that the training delivery and support can be carried out effectively throughout the term of the learning. Only relevant information would be shared with relevant persons. Relevant persons would include: Management, Vocational Instructors and Assessors, Booking administrators, Certificate registration personnel and Finance.

External data sharing

We will only share personal data with other third parties (including group entities) where we have a legitimate purpose, and an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. to HMRC for tax purposes) or where necessary to perform our contractual duties to individuals (e.g. provision of information to our occupational pension providers).

We may appoint third party service providers (known as processors) who will handle information on our behalf, for example to provide payroll, data storage or other technology services. TTE remains responsible for ensuring that its processors comply with data protection law and this Policy in their handling of personal data. We must assess and apply data protection and information security measures prior to and during the appointment of a processor. The extent of these measures will vary depending on the nature of the activities, but will include appropriate risk assessments and reviews, and contractual obligations.

Details of the recipients or categories of recipients of personal data (including processors and other third parties) should be set out in privacy notices as described in section 1 above.

Other third parties

Aside from our service providers, TTE will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.

We may share your data :

- With Governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -
- To comply with our legal obligations;
- To exercise our legal rights (for example in court cases);
- For the prevention, detection, investigation of crime or prosecution of offenders; and
- For the protection of our employees and customers.

In the case of International bespoke training delivery programmes we will have an obligation to share information with UKBA and FCO authorities if requested, as well as the above.

The sharing or disclosure of personal data is a type of processing, and therefore all the principles described in this Policy need to be applied.

TTE may only share or disclose the personal data we hold internally with an Employee, or representative of TTE if the recipient has a job-related need to know the information.

We may only disclose the personal data we hold to service providers or other third parties (including group entities) where:

- There is a legitimate purpose and an appropriate legal ground for doing so (e.g. it is necessary for them to process the personal data in order to provide a service to us such as payroll, or if we are legally obliged to do so);
- The individuals whose personal data is being shared have been properly informed (e.g. in an appropriate privacy notice);
- If the disclosure is to a service provider, TTE has checked that adequate security and data protection measures are in place to protect the personal data concerned;
- The service provider or third party has signed up to a written contract that contains the provisions required by data protection law unless the Compliance Department has determined that this is not required in context); and
- The transfer complies with any overseas transfer restrictions, if applicable.

Routine disclosures of personal data to established recipients (e.g. payroll providers or group entities) which form a normal and regular part of your role and job duties will ordinarily satisfy the above requirements. You should always ensure you comply with any particular company instructions you are given. However, if you are in any doubt as to whether you can share personal data with anyone else, first contact the Compliance Department.

9. We do not transfer personal data to another country unless there are appropriate safeguards in place.

An overseas transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed or otherwise processed in, a different country. European Union data protection law restricts, in

particular, personal data transfers to countries outside of the European Economic Area (EEA – this is the European Union plus Norway, Liechtenstein and Iceland), to ensure that the level of data protection afforded to individuals is not compromised (as the laws of such countries may not provide the same level of protection for personal data as within the EEA).

To ensure that data protection is not compromised when personal data is transferred to another country, TTE assesses the risks of any transfer of personal data outside of the UK (taking into account the principles in this Policy, as well as the restrictions on transfers outside the EEA) and puts in place additional appropriate safeguards where required.

If we are required to transfer individuals' personal data outside of the UK or EEA in the course of your engagement with us, adequate safeguards will need to be in place. Where these overseas transfers are a normal part of our role and duties, TTE's current safeguards are likely to provide the required levels of data protection.

However, if we are transferring personal data overseas in alternative circumstances (e.g. for new types of processing activities which haven't previously formed part of our scope and activities, or to countries with which we haven't previously dealt) we will seek further guidance before going ahead with the transfer.

10. Report any data protection breaches without delay

TTE takes any data protection breaches very seriously. These can include lost or mislaid equipment or data, use of inaccurate or excessive data, failure to address an individual's rights, accidental sending of data to the wrong person, unauthorised access to, use of or disclosure of data, deliberate attacks on TTE's systems or theft of records, and any equivalent breaches by TTE's service providers.

Where there has been a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to individuals' personal data, TTE will take immediate steps to identify, assess and address it, including containing the risks, remedying the breach, and notifying appropriate parties (see below). TTE has a Contingency plan / risks register which sets out its procedures for identifying, assessing and addressing security breaches.

If TTE discovers that there has been a personal data security breach that poses a risk to the rights and freedoms of individuals, we will report it to the ICO within 72 hours of discovery.

We also keep an internal record of all personal data breaches regardless of their effect and whether or not we report them to the ICO.

If a personal data breach is likely to result in a high risk to the rights and freedoms of individuals, we will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures we have taken.

If you become aware of any breach (or suspected breach) of this Policy (including, in particular any security breach), you must report it to the EDT/SMT or to gdpr@tte.co.uk

11. Do not use profiling or automated decision-making unless we are authorised to do so

Profiling, or automated decision-making, occurs where an individual's personal data is processed and evaluated by automated means resulting in an important decision being taken in relation to that

individual. This poses particular risks for individuals where a decision is based solely on that profiling or other automated processing.

One example of solely automated decision-making would be using an online psychometric test to automatically reject job applicants who do not meet a minimum pass mark (without any human oversight such as a review of the test results by a recruiting manager).

Data protection law prohibits decision-making based solely on profiling or other automated processing, except in very limited circumstances. In addition, where profiling or other automated decision-making *is* permitted, safeguards must be put in place and we must give individuals the opportunity to express their point of view and challenge the decision. We do not generally conduct profiling or other automated decision-making in respect of Employees'/customers'/learners' personal data.

What do we do?

If we conduct profiling or other automated decision-making in the course of our business, we will implement any applicable safeguards.

If you are proposing to undertake any new automated decision-making or profiling activities in the course of your employment, please contact gdpr@tte.co.uk, who will advise you whether it is permitted and about the safeguards you need to put in place.

12. Individual Rights and Requests

Under data protection law, individuals have certain rights when it comes to how we handle their personal data. For example, an individual has the following rights:

The right to access.

The right to make a 'subject access request'. This entitles an individual to receive a copy of the personal data we hold about them, together with information about how and why we process it and other rights which they have (as outlined below). This enables them, for example, to check we are lawfully processing their data and to correct any inaccuracies. Please include with your request information that will enable us to identify you.

The right to rectification

The right to request that we correct incomplete or inaccurate personal data that we hold about you.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using gdpr@tte.co.uk

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using gdpr@tte.co.uk

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

TTE is required to comply with these rights without undue delay and, in respect of certain rights, within a one month timeframe.

Individuals also have rights to complain to the ICO about, and to take action in court to enforce their rights and seek compensation for damage suffered from, any breaches.

What we do?

If we receive a request from an individual seeking to exercise a right in relation to their personal data, or making an enquiry or complaint about our use of their personal data, we will forward the request, enquiry or complaint to gdpr@tte.co.uk immediately so that it can be dealt with appropriately and within the applicable time limit. Your assistance may be needed to address and respond to the request, enquiry or complaint.

Record Keeping

In order to comply, and demonstrate our compliance, with data protection law, TTE keeps various records of our data processing activities. These include a Record of Processing which must contain, as a minimum: the purposes of processing; categories of data subjects and personal data; categories of recipients of disclosures of data; information about international data transfers; envisaged retention periods; general descriptions of security measures applied; and certain additional details for special category data.

What we do?

Where we must also comply with our applicable processes/guidelines and any specific instructions we are given concerning the keeping of records about our processing of personal data.

We are processing individuals' personal data in the course of your engaging with us and we collect any new types of personal data or undertake any new types of processing activities, either through the introduction of new systems or technology or by amending existing ones, we will inform you so that we are able to keep our records up-to-date.

13. Integrate data protection into operations

Data protection law requires TTE to build data protection considerations and security measures into all of our operations that involve the processing of personal data, particularly at the start of a new project or activity which may impact on the privacy of individuals. This involves taking into account various factors including:

- The risks (and their likelihood and severity) posed by the processing for the rights and freedoms of individuals;
- Technological capabilities;
- The cost of implementation; and
- The nature, scope, context and purposes of the processing of personal data.

We also seek to assess data protection risks regularly throughout the lifecycle of any project or activity which involves the use of personal data.

14. Training

We require all Employees to undergo some basic training to enable them to comply with data protection law and this policy. Additional training may be required for specific roles and activities involving the use of personal data.

To this end, we provide training as part of our Continuous Professional Development Programme and will be incorporated into our induction process and through an ongoing training programme to make sure that Employees' knowledge and understanding of what is necessary for compliance in the context of their role is up-to-date. Attendance at such training is mandatory and will be recorded.

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint with the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Departures from this Policy

There are some very limited exemptions from data protection law, which may permit departure from aspects of this Policy in certain circumstances.

You will be given specific instructions if any exemptions are relevant to your role.



Steve Grant
Group Managing Director

May 2018

Your signature indicates that you have read the TTE Data Protection Policy.

By signing this document means that you will abide by the regulations set forth in the TTE Data Protection Policy.

Name Signature..... Date

This page is to be completed, detached and returned to the HR department for filing in my personnel file.

**THIS FORM WAS SENT TO THE HR
DEPARTMENT ON**

(PLEASE INSERT DATE).

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