



## Privacy Policy - Candidates & Customers (Policy ref: ATL006-01)

### Introduction

Automotive Training Ltd (ATL) is committed to data security and the fair and transparent processing of personal data.

This privacy policy sets out how members of ATL, treat personal data

Please read the policy carefully as it contains important information as to; who we are, how to contact us, what data we collect, how we collect your data, how and why we use your data, who we share your personal data with, how long we keep your data for, where we store your data, consent and marketing, your rights in relation to your personal data, and how to contact supervisory authorities in the event that you would like to report a concern.

### Who we are

For the purpose of the General Data Protection Regulation (GDPR), ATL is the 'controller' of *candidate* personal data through the training and both the 'processor' and 'controller' of *customer* personal data through the workshop.

ATL is a private training provider offering varied training to the automotive industry. ATL also trades as "ATL Workshops" offering workshop services to public and trade customers. Our operating address is Maslow Court, Canterbury Road, Chilham, Canterbury, Kent CT4 8DZ.

### How to contact us

If you have any queries about this policy, the way in which we process personal data, or about exercising any of your rights, you may contact our privacy representative by sending an e-mail to [contactus@automotivetrainingltd.org](mailto:contactus@automotivetrainingltd.org) or writing to The Data Protection Officer at the above postal address.

### What Personal Data do we collect?

Personal information that is capable of identifying you as an individual, including;

Training;

- **Personal information** such as; Personal Names, Gender, Date of Birth, Driving licence number (of which we retain a copy and a copy of your driving record also), your image (on security CCTV around our site and a photograph of you (with candidate number too))
- **Contact information** such as; Postal Address, Employer (including contact details), Telephone number(s), E-mail address(es),
- **Education / experience**, such as; Motor trade experience, ATA Accreditation number, Vocational qualifications or accreditations you currently hold (this may include unique reference numbers),
- **Payment details**, such as; either your or your employer's financial and transaction data (such as debit/credit card and other bank account information) for the purposes of billing/payment

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- **Purchase history**, to include which training you have enquired about, and which has and has not been completed
- **Sensitive data**, such as; Health related details (including; health history, current medical status, GP surgery details and next of kin details),

Workshop;

- **Personal information** such as; Personal Names, Gender
- **Contact information** such as; Postal Address, Telephone number(s), E-mail address(es)
- **Payment details**, such as; your financial and transaction data (example debit/credit card and other bank account information) for the purposes of billing/payment
- **Vehicle details**, which may include; registration mark (number plate), manufacturer, model, year of manufacture, colour
- **Vehicle information** , which may include; date of MOT expiration, service history, work pertaining to your vehicle (both enquiries and completed)

These lists are not exhaustive and may be updated.

ATL complies with its obligations under the Data Protection Act (1998) and GDPR (2018) by;

- keeping personal data up to date
- keeping personal data stored and destroyed securely
- not collecting or retaining excessive amounts of data

## How we collect personal data

We obtain information when;

Training;

- Completing an application form
- You enquire as to courses we run by phone, email or by post, we will keep a record of that correspondence
- Enter competitions or promotions
- Post/comment on our online media

Workshop;

- You enquire about services we offer
- You provide information about yourself or your vehicle to enable advice, diagnosis or work to be completed
- Enter competitions or promotions
- Post/comment on our online media

## How and why we use your personal data

We use this personal data to;

Training;

- share with awarding bodies to register for qualifications and accreditations, this includes your photograph
- to gain certification / accreditation on successful completion of training and assessment
- for your safety whilst carrying out training / assessment at our premises
- To process any competition entries or promotions you have entered
- For billing purposes
- To provide you with information , products or services that you request from us or which we feel may interest you where you have consented for such marketing purposes
- To carry out our obligations arising from any contracts entered into between you and ATL
- To notify you about changes to our service(s)
- To supply your data to third parties to whom we have a contractual or legal obligation, this may include CCTV images (see “Who we share your personal data with”)

We may at times ask for additional sensitive personal data to share with awarding bodies to enable us to request ‘reasonable adjustments’ for e.g. a reader, extra time to complete on-line assessments.

Workshop;

- contact you regarding your vehicle, including work completed, and reminders about your vehicle
- To process any competition entries or promotions you have entered
- For billing purposes
- To provide you with information , products or services that you request from us or which we feel may interest you where you have consented for such marketing purposes
- To carry out our obligations arising from any contracts entered into between you and ATL
- To notify you about changes to our service(s)
- To supply your data to third parties to whom we have a contractual or legal obligation, this may include CCTV images (see “Who we share your personal data with”)

These lists are not exhaustive and may be updated.

## Who we share your personal data with

ATL does **not** sell your information to third parties.

We will share your personal data with;

Training;

- the appropriate awarding body in relation to your learning, assessment or certification
- DVSA if required, for MOT Testers and Managers
- external verifiers employed by the awarding bodies

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Workshop;

- DVSA or DVLA, if required by a legitimate and lawful request or legal obligation or as requested by DVSA for MOT Testing

We may also process your personal data if required by law, including responding to requests by government or law enforcement authorities or for the prevention of crime or fraud

We treat all information we hold about you as private and confidential. We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to personal data to those who have a genuine business need to know it.

## **How long we keep your personal data**

Training;

We will retain personal data relating to your learning, assessment, and certification for a period of seventy years.

The first 7 years being to keep in-line with awarding body policies and to comply with any contractual, legal, audit and other regulatory requirements. After this time we will store your certificate / accreditations only for the purpose of providing you with a copy of your certificate / accreditation in the event that you have lost it. This is to assist you in such an event, as the awarding bodies rarely keep this information after 7 years. To this end, please ensure you keep your contact details with us up to date.

Workshop;

We will retain personal data relating to you and / or your vehicle, for a period of 5 years from your last contact with us.

This is considered a reasonable amount of time to keep records for the purposes of MOT reminder and continuation of care for the same vehicle.

## **Where we store your personal data and how it is protected**

We take reasonable steps to protect data from loss or destruction.

We secure your data electronically by limiting access, use of passwords, etc.

We secure your data in paper form by keeping it in a secure storage area, with access only by those with a business need.

Electronically stored data may be stored in “the cloud”. We use remote website server hosts to provide this service, which may be based outside of the European Economic Area (EEA). If this is the case, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy. We will not use the service outside of the EEA.

## Marketing and consent

### Training;

We may use your personal data where this is necessary to pursue our legitimate interests as a training provider including to:

- Provide you with information/services which you have registered for
- Undertake administration in relation to products/services which you have registered for
- Contact you directly in relation to new and existing services, awards being offered and industry opportunities that we feel may be of interest

### Workshop;

We may use your personal data where this is necessary to pursue our legitimate interests as a workshop provider including to:

- Provide you with information/services which you have registered for
- Contact you directly in relation to new and existing services and industry opportunities that we feel may be of interest

You will only be sent information for marketing purposes should you consent to receive it and, if having given consent you later change your mind, you are free to remove your consent. (See the sections “Access request” and “Deletion of personal data” below.)

## Access request

Under GDPR regulations, you have the right to know what personal data we hold about you, to request to see this is performing an ‘Access Request’.

Should you wish to exercise this right, please contact our Data Protection Officer in the first instance (details on page 1).

Under GDPR direction, we have one calendar month to complete this operation.

Your “right to rectification” - Although ATL staff takes great care in entering your personal data accurately, should you find any inaccuracies or out of date information, you can request that ATL corrects it.

## Deletion of personal data

If you ask us to delete your personal data we will;

### Training:

- Check electronic records for records pertaining to you
  - We will erase data that is not required to be kept by awarding bodies or legal entities
- Check paper records for records pertaining to you
  - We will scan into electronic form any records that are required to be kept by awarding bodies or legal entities, and securely destroy the remainder.

Please note that after erasure, we will be unable to provide you with any copies of certificates or accreditations: the awarding bodies rarely keep these indefinitely.

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#### Workshop:

- Check electronic records for records pertaining to you
  - We will erase data that is not required to be kept by legal entities
- Check paper records for records pertaining to you
  - We will scan into electronic form any records that are required to be kept by legal entities, and securely destroy the remaining paper records.

#### Training and Workshop;

Under GDPR direction, we have one calendar month to complete this operation.

We intend to contact you when we have completed this, to confirm its completion.

### How to report a concern

If you believe that ATL is in some way not adhering to GDPR with respect to your data, please do contact our Data Protection Officer in the first instance (details on page 1).

If you wish to report your concerns, please contact; <https://ico.org.uk/> or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. (This postal address and website address are correct as of May 2018)