

4 Minutes Training Ltd

Data Protection Policy

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1. Document Control and Version History

Version Number	Reason for Change	Date
1.0	Initial Release	10 July 2017
1.1	Take account of GDPR rules	29 January 2019
1.2	Change instance of Data Protection act to GDPR instead	1 May 2019
1.3	Review and update	27 July 2026

2. Definitions

Item	Definition
4 Minutes	4 Minutes Training Ltd
Booking	The act of Booking one or more individual places on a course and/or the act of Booking a course for a group of people
Awarding Organisation / Body	The Organisation that oversees 4 Minutes to ensure compliance with its policies and Procedures. It acts as an intermediary between 4 Minutes and an appropriate Regulator
ICO	Information Commissioner's Office – Manages Data Protection in the UK
DPR	Data Protection Register
GDPR	The European General Data Protection Regulation

3. Overview

In April 2018, the Europe-wide General Data Protection Regulation (GDPR) came into effect. This brought into force a wide range of regulations designed to protect users and their data to a higher level than before. It sets out seven principles for the obtaining, handling, processing, moving and storage of personal data. These seven principles replaced and extended the previous eight principles.

4 Minutes is committed to the rules of data protection and abiding by these Principles.

As a training centre, 4 Minutes is required to collect and process information as required by the Awarding Bodies and its Regulators.

4 Minutes is therefore considered the Data Controller and its course candidates and employees the Data Subjects.

4 Minutes is registered with the Information Commissioners Office (ICO) under registration reference number ZA260859 as a 'Training Company'

4. The 7 Data Protection Principles

- 4.1. Data must be obtained and processed lawfully, fairly and transparently
- 4.2. Data must be obtained for a specified and limited purpose
- 4.3. Data must be adequate, relevant and not excessive for its collection purpose
- 4.4. Data must be accurate and kept up to date
- 4.5. Data must not be kept for longer than is necessary for its purpose
- 4.6. Data must be kept safe from unauthorised access, accidental loss or destruction
- 4.7. Data Controllers must be accountable for the data that it processes and stores and be able to demonstrate this

5. Principles in detail

5.1. Lawful, fair and transparent

4 Minutes needs personal data to register, assess and certify students on its courses. In addition, it emails a Newsletter out to people that have opted in to receive it. Enquiries also arrive by email, telephone calls and personal meetings and 4 Minutes records and stores personal data generated by these methods. This is the lawful basis on which we process personal data.

4 Minutes handles all personal data in a way that people would reasonably expect and, if it happens, we can explain why unexpected data processing occurred. 4 Minutes is open and transparent about the reasons why data is collected and does not deceive or mislead people as to the purposes.

5.2. Limited purpose

4 Minutes needs personal data to register, assess and certify students on its courses as well as remind them when certificates become due for renewal. It shares this data where appropriate with its Awarding Organisation(s) and Regulatory Authority(ies) where needed to process the course certification. In addition, it emails a Newsletter out to people that have opted in to receive it. It does not use this data outside of these purposes without the explicit consent of the user / student or if it is required to by Law.

5. Adequate, relevant and Limited data held

4 Minutes only holds data that it considers necessary. For students, this is to process a student's course registration, certification and renewal reminder. For Newsletter sign-ups, this is the data necessary to send out personalized email newsletters. Anyone that we hold data for has the right to complete incomplete data, rectify inaccurate data and make 4 Minutes delete data that is not needed ('Right to be forgotten')

5.1. Accurate and up to date

4 Minutes takes all reasonable steps to ensure that data held are accurate and up to date. Data are collected via forms completed by students at course registration or by information provided by a user on a Newsletter sign-up form. Individuals have a right to view, challenge and request change or deletion of their own data.

5.2. Not kept longer than is necessary

4 Minutes only holds personal data for as long as is necessary. This information is detailed further in its Record retention Policy (4MPP/016), available upon request or as a download from its website at www.4Minutes.co.uk

Personal information is shared with 4 Minutes' Awarding Organisations and Regulators where needed to process student certification. These organisations have their own Record Retention Policy available on their websites or by contacting the Organisations directly. 4 Minutes is not responsible for other organisations' policies.

This Policy does not affect an individual's Right to be forgotten.

5.3. Kept safe from unauthorised access, accidental loss or destruction

4 Minutes has appropriate security measures in place to protect personal data. These include, but are not limited to, locked storage (hard copy of information), password-protected storage (electronic information), user access control (limit who can view / edit data) and destruction of data in keeping with Principle 5.5

4 Minutes takes all reasonable steps to protect personal data and to be able to reproduce it in the event of accidental loss or destruction.

5.4. Accountable for data

4 Minutes is accountable for the personal data that it holds. It takes responsibility for the data that it holds and maintains appropriate records to demonstrate compliance.

6. Data Subjects Rights

Users that have personal data stored by 4 Minutes have the Right:

- 6.1. To know what information is held by 4 Minutes about them and why
- 6.2. To know how to gain access to it
- 6.3. To know how to keep it up to date
- 6.4. To know what 4 Minutes does to ensure compliance with its legal obligations

7. Data Collection

- 7.1. All candidate and staff data are provided by the candidate, staff or appointed person (e.g. person booking the course) and checked by them as being correct at the time.
- 7.2. 4 Minutes collects personal data as part of the booking and registration process of and for qualification delivery.
- 7.3. 4 Minutes collects and retains personal data as part of their 4 Minutes trainer and staff administrative tasks.
- 7.4. 4 Minutes collects and retains personal data when users opt in to receive 4 Minutes' Newsletter.

8. Data Storage

4 Minutes will ensure that:

- 8.1. Data are held securely. For example, password protected computers, locked cabinets and drawers.
- 8.2. Course registrations (which includes, name, address, contact details, colour, race, signature) are removed from sight and access of other course candidates immediately after completion
- 8.3. Data are not disclosed or shared orally or in writing to any unauthorised parties
- 8.4. 4 Minutes will input course candidate data to the Awarding Body website and promptly submit all documentation to the Awarding Body.
- 8.5. Data submitted will only be viewable via individual unique user log on details and passwords for 4 Minutes and the Awarding Body.
- 8.6. 4 Minutes staff will not share their log on and passwords with any unauthorised individuals or companies

9. Data Retention

Data retention is covered separately in 4 Minutes' Record retention Policy, 4MPP/016 available on request or as a download from its website at www.4Minutes.co.uk

10. Data Destruction

4 Minutes will ensure it destroys data in a confidential manner e.g. shredding of paper documents, deletion from computer systems.

11. Data Access

- 11.1. You may request details of personal information which we hold about you under the General Data Protection Regulation 2018. If you would like a copy of the information held on you please write to 4 Minutes Training, 3 Timbers Walk, Maidenhead Berkshire SL6 4QL. We will need proof of identity before the release of any personal information.
- 11.2. There is a charge of £10 for a copy of your data (as permitted by law). We aim to reply as promptly as we can and, in any case, within the legal maximum of 40 days.
- 11.3. If you believe that any information that we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect. We will need proof of identity before amending any personal information.

END OF POLICY