

Data Protection Privacy Notice

PETA Limited provides a range of services to both members of the public and to those employed within business. To enable us to provide a service, we have to collect and use personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about individuals who come into contact with the Company such as:

- ▲ A business customer contacting PETA on behalf of an employer;
- ▲ Someone who would like to develop their career and attend one of our open courses but pay for this themselves;
- ▲ People who register on a government funded programme such as an Apprenticeship or full-time education ([see Learner's Privacy Notice](#));
- ▲ People who apply for grants in relation to the services we deliver;
- ▲ Complainants and other individuals in relation to a complaint or query;
- ▲ Job applicants ([see Job Applicants Privacy Notice](#)) and our current and former employees ([see Employee Privacy Notice](#));
- ▲ Visitors to our website ([see Website Privacy Notice](#));
- ▲ PETA Councillors

This information is gathered in order to enable the provision of services. In addition, the Company may be required by law to collect, use and share certain information.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information both during and after your working relationship with the Company. We are required under the GDPR to notify you of the information contained in this privacy notice.

Data Protection Principles

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified.

The Company collects, uses and processes a range of personal information about you. This includes:

- ▲ Personal contact details such as name and title;
- ▲ Address, telephone number and email address;
- ▲ Membership contact details

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- ▲ Bank account details
- ▲ Disability access requirements
- ▲ CCTV footage

The legal basis for holding this information is that it is necessary for us to fulfil the contract we have with you when you are purchasing a service from us and where processing is necessary for the performance of a task carried out in the public interest.

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of the services we provide and which does not materially impact on your rights, freedoms or interests. For example, we may use your contact details to send you direct marketing information telling you about training courses or events that we think might interest you. We will always ask you would prefer to be removed from our mailing lists. However it will mean that you will no longer be informed about special offers or events that we are running.

How do we collect your personal information?

- ▲ When you telephone us. PETA delivers a personal service when calling, therefore information you call about will be recorded and passed to relevant people within our business to enable us to deal with your call. This information may be stored on a database for the purposes of providing the service and for monitoring trends;
- ▲ When you email us. Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with PETA's information security policies. Email monitoring or blocking software may also be used.
- ▲ PETA uses a secure email service for sending personal data outside the company. Other organisations are responsible for ensuring that any email that is sent to PETA is secure and within the bounds of the law.
- ▲ When you contact us via social media. PETA uses a range of social media services to publicise news, stories, offers and events and to receive comments and feedback from customers and the general public including through direct messages, which are private, and through posts which are public to other social media users.
- ▲ The information you provide via social media is subject to the social media service providers' privacy notices and policies. Any information you post on PETA's social media platforms is also subject to PETA's social media policy.
- ▲ People who make a complaint to us. When we receive a complaint from a person we will hold information containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in our IMS file in line with our retention policy, which is available on request. Information relating to a complaint will normally be retained for up to 3 years from when the complaint is resolved.

It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

How do we use your information?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- ▲ Deliver services and support to members of the public and businesses
- ▲ Help investigate any concerns or complaints
- ▲ Plan and manage services, including checking on the quality of services, developing future services and monitoring trends
- ▲ Deal with payments, grant, and other financial transactions
- ▲ Check an individual's identify or entitlement to personal information
- ▲ Carry out research and consult with customers who use our services
- ▲ Carry out a survey to find out if they are happy with the service they received
- ▲ Deal with enquiries and any subsequent issues
- ▲ Check on the level of service we provide and to enable us to deliver the service once agreed
- ▲ Fulful our statutory obligations such as protecting vulnerable children and adults
- ▲ For research, planning and statistical purposes
- ▲ Monitor the performance of the services and to evaluate and develop those services.

We may also use your personal information in the following situations which are likely to be rare:

- ▲ Where we need to protect your interests (or someone else's interests)
- ▲ Where it is needed in the public interest or for official purposes

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Email addresses and preferences

PETA Ltd. uses a web-based service to manage email addresses and preferences for sending marketing information to customers. This is a secure platform that adheres to PETA's information security standards and data processing policies and complies with the GDPR. You can unsubscribe from this service at any time.

JOB APPLICANTS

Refer to PETA's Applicant's Privacy Notice

Visitors to our Website

(See PETA's Website Privacy Notice)

Visitors to our Premises

CCTV

Recognisable images captured by CCTV systems are "personal data". They are therefore subject to the provisions of the General Data Protection Regulations (GDPR).

CCTV systems are installed for the purpose of enhancing security for employees, learners and visitors to it's premises as well as security of the Company's property. The legal basis for which CCTV surveillance is intended is in the public interest; namely for the purposes of:

- ▲ Promoting the health and safety of employees, learners and visitors;
- ▲ Reducing the incidence of crime and anti-social behaviour including theft and vandalism;
- ▲ Supporting the police in deterring and detecting crime;

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- ▲ Assisting in identifying, apprehending and prosecuting offenders;
- ▲ Protecting the Company's buildings and assets.

The Company, therefore, reserves the right to refer to CCTV recordings as a source of evidence in any investigation (including disciplinary) which may include matters relating to a breach in company policy or code of conduct and/or inappropriate or aggressive behaviour on the part of an employee, learner, customer or member of the public.

Use of the CCTV technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring staff performance.

CCTV video recording will cover the building's entrances and exits, lobbies and common areas. Adequate signage will be displayed around the site indicating that CCTV is in operation. However, signs will not be located at all doors or at all camera points.

The Company will only install covert cameras if it is deemed that this is necessary, under the direction of the CEO once agreed by the Chair of PETA's Council.

The images/recordings captured by the CCTV systems will be retained for a maximum of 30 days and then erased or overwritten, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised staff and when recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

DVDs/memory sticks storing the CCTV system and stored images will be restricted to authorised staff only. In relevant circumstances, CCTV footage may be accessed:

- ▲ By Police where the Company is required by law to make a report regarding a suspected crime;
- ▲ Following a request by Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on site;
- ▲ To the HSE and/or other statutory body charged with safeguarding;
- ▲ To assist the Company in establishing the facts in cases of unacceptable behaviour
- ▲ To the Company's insurance company for evidence regarding damage done to the insured property.

Any person whose image has been recorded has the right to be given a copy of the information recorded which relates to them, unless an exemption/prohibition does not allow the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identifiable. To exercise their right of access, a data subject must complete a [Data Subject Request](#) and submit this to dataprotection@peta.co.uk.

A person should provide all the necessary information to assist the Company in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be released.

In providing a person a copy of their data, the Company may provide a still/series of still pictures, a disk or memory stick with relevant images. However, any images of other individuals will be redacted.

The Company will not release information/images where the Company believes the safeguarding of learners or Company security may be compromised, or where redaction is not reasonable practicable.

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TAKING PHOTOGRAPHS

The Company takes photographs of events in order to pursue the Company's legitimate interests in promoting the services we offer through differing promotional channels. We display notices at the venue to inform visitors that photography will be taking place, and how to notify us if you do not wish to be photographed.

HOW DO WE KEEP PERSONAL INFORMATION SECURE?

We will take appropriate steps to make sure that the personal information we hold (on paper and electronically) is kept securely and only used by people who have a right to see it. PETA's security measures include encrypting personal data and equipment, system access controls and training in data protection for all staff.

Where another company or organisation processes personal information on behalf of PETA, they will only process your personal information in line with PETA's instructions and are obliged to provide security assurances to PETA and to certain regulatory bodies.

HOW LONG DO WE KEEP HOLD OF PERSONAL INFORMATION?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Retention periods are recorded in the Control of Records procedure and reviewed regularly to meet the demands of the law and regulatory bodies.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We use third-party service providers for elements of managing our business eg IT and marketing support and who are required to protect your personal information in line with our policies and the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions and the GDPR.

When we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

We use a number of commercial organisations and systems suppliers to either store personal information or to manage it on our behalf.

We may pass your information to other agencies or organisations as allowed or required by law, for example to enable them to carry out their statutory duties or where it is necessary to prevent harm to yourself or other individuals.

We may be required by law to disclose your personal information without your consent for the purposes of preventing or detecting crime/fraud or apprehending and prosecuting offenders (for example to the police or where we have a statutory duty to do so).

WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- ▲ request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- ▲ request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected

- ▲ request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected
- ▲ restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- ▲ object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- ▲ data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact our Data Protection Lead for a Data Subject Request form (see 'How to contact us' below). We will need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights.

This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact our Data Protection Lead. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

TRANSFERRING PERSONAL INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA

The Company will not transfer your personal information to countries outside the European Economic Area.

AUTOMATED DECISION MAKING

Automated decision making occurs when an electronic system uses your personal information to make a decision without human intervention. We do not envisage that any employment decisions will be taken about you based solely on automated decision making, including profiling. However, we will notify you in writing if this position changes.

CHANGES TO THIS PRIVACY NOTICE

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

HOW DO YOU CONTACT US?

If you have any questions about this privacy notice or how we handle your personal information, please email dataprotection@peta.co.uk or write to the Data Protection Lead at:

PETA Ltd
1 Access Point
Northarbour Road
Portsmouth
Hampshire PO6 3TE

Telephone: 023 9253 8700