

This **Privacy Policy** sets out how we use and protect any information that you provide in respect of using the services of HASCA Ltd. We are committed to ensuring that your privacy is protected and the information which you provide will only be used in accordance with this **Privacy Policy**. This policy may change from time to time so please ensure that you have read the policy on our website when booking. This policy is effective from May 2018.

If you have any queries about this **Privacy Policy** or our treatment of your personal information then please email us at: lynda@hascald.co.uk.

1. What personal information do we collect?

We collect, store and use the following kinds of personal information in respect of registering learners with awarding bodies and providing training services at HASCA Ltd:

- Name of Learner (Title, First Name, Last Name)
- Date of Birth
- Gender
- Address for training certificate
- Contact information (phone, email) of learner
- Employment information (Job Title, Days/Hours Worked, Type and Name of Employer, address of work place, phone, email and brief description of job, Managers name),
- Training needs information (Objectives for training, relevant course names undertaken in the last 2 years, category of education level achieved).
- Training approval and payment information
- Certification of training (Name, Date and Qualification received)

We collect, store and use additional anonymised sensitive data but this is not collected, stored or used in relation to a specific person. We collect and store special category data (health) in relation to any disabilities that a learner may have which we need to be aware of when providing training. This data is only provided with the consent of the learner and is not shared with any third party.

We collect, store and use the following kinds of personal information in respect of notifying you of any special offers related to the training services of HASCA Ltd that you have provided explicit consent to be contacted about:

- Name of person
- Email address
- Date Consent to content granted
- Method of Consent notification
- Date Consent removed
- Method of Consent removal notification

2. How we collect the personal information

We collect the personal information in respect of training services at HASCA Ltd from:

- The **Registration Form** which is completed and emailed to us for the Certificate in Principles of Commissioning for Wellbeing course
- The **Booking Form** which is completed and emailed to us for Horses Lead Courses related training courses.

We collect the additional anonymised sensitive data in respect of training services at HASCA Ltd from:

- The **Monitoring Form** which is completed anonymously on hard copy on the training course.

We collect special category data (health) via phone conversations with the learner.

We collect the personal information in respect of explicit consent, or not, for you to be contacted by us for notification of training courses at HASCA Ltd from either:

- The **Registration Form** which is completed and emailed to us for the Certificate in Principles of Commissioning for Wellbeing course
- The **Booking Form** which is completed and emailed to us for Horses Lead Courses related training courses.
- Submitting a specific request to **Subscribe** to such notifications on our website which is transmitted via a secure email (TLS).
- Submitting a specific request to **Un-Subscribe** to such notifications by replying to a notification.

3. Why we require this personal information

The personal information is necessary to enable us to process and deliver your training. If the personal information is missing or incomplete then this could affect our ability to undertake your registration and training.

We collect special category data (health) solely to establish if there are any special needs for the learner in respect of training delivery.

Under the Data Protection Act (and its subsequent [General Data Protection Regulation](#) our Lawful Basis for capturing and processing this data is Contract and Consent as we require this information to:

- Enable us to answer any questions that you have regarding our services.
- Enable us to process the qualification registration, deliver the training, take payment and fulfill the contractual obligations of such a service.

The personal information related to explicit consent for notifications is necessary to enable us:

- Contact you via the email address you have provided from time to time with information related to using HASCA Ltd training services. Not bother you with emails that you have not requested, or no longer wish to receive.

4. How we store and process this personal information?

We are committed to ensuring that your privacy is protected and that the information we ask you to provide will be managed securely and will only be used in accordance with this **Privacy Policy**. In processing the personal information we use a variety of password systems which include:

- OneFile (VLE) – personal data is uploaded and can be maintained by the Learner and this system holds information about the learner, training and a copy of the **Registration Form**.
- Dropbox – holds the email contact list related to a specific course, information related to course payment/invoicing, and a copy of the **Registration Form** and the **Booking Form**.
- Email server – holds email contact lists and email correspondence.
- WebEx – holds emails used to invite learners onto training sessions and recordings of those sessions.
- Locked cabinet – holds paper copies of identity information required for course registration, any paper **Registration Form** or **Booking Form** received, training evaluation forms and information regarding complaints.

We access your personal data using a number of password protected devices including:

- Laptops.
- Tablet.
- Backup device – which is stored in the locked cabinet.

We share the following personal information with the awarding body ([Highfield Awarding Body for Compliance Ltd](#)):

- Learners name, Date of Birth and gender.

We hold personal information for the minimum amount of time to allow us to manage and deliver your training or keep you informed of training courses. Typically we hold personal information for 3 years after completion of training as requested by the awarding body and if you ask to be removed from receiving training notifications then we hold this information for 2 months after notification.

When personal information is no longer required to be stored we physically delete it, including clearing out electronic 'trash' folders and we shred any paper based information we have received from you such as the **Registration Form** or the **Booking Form**.

5. Controlling your personal information

If you believe that any information we are holding on you is incorrect or incomplete, please provide us with you name and email address, and the information which is incorrect, and either:

- write to us at the following address and request to 'Personal Information update'

Hasca Ltd
The Studio
36 Dickson
Cheshunt, Herts, EN7 6HD

- email us at lynda@hascald.co.uk with the words 'Personal Information update' in the email subject.
- let us know when next you visit us.

Please contact us as soon as possible and we will promptly correct any information found to be incorrect.

You may choose not to grant explicit consent to be contacted by us in respect of notifications and if you have previously granted this consent you may change your mind at any time by providing us with you name and email address and either:

- Reply to a notification you have received with the words 'Unsubscribe' in the email subject.
- Write to us at the following address and request to 'Unsubscribe'

Hasca Ltd
The Studio
36 Dickson
Cheshunt, Herts, EN7 6HD

- Emailing us at Sharon@hascald.co.uk with the words 'Unsubscribe' in the email subject.

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so.

You may request details of personal information which we hold about you under the Data Protection Act 1998 or indeed request that we delete such information (Subject Access Request). To do this:

- Write to us at the following address, requesting to either receive 'Provision of personal information' or 'Delete personal information' and provide your name, address and email address:

Hasca Ltd
The Studio
36 Dickson
Cheshunt, Herts, EN7 6HD

- Enclose a cheque for £10 payable to Hasca Ltd.
- Include appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address). This information is solely used to help verify that we are dealing with the person to whom the information relates.

We will provide such information to you, or provide confirmation that such information has been deleted, by post.

6. How you can make a complaint

If you believe there has been a data breach please contact the Data Controller (Lynda Tarpey) immediately so we can investigate if however you think we are not processing your personal data appropriately then you can register a formal complaint by contacting the Information Commissioners Office at <https://ico.org.uk/for-organisations/report-a-breach/>.

7. How we use Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Our website does not use cookies.

8. Links to other websites

Our website may contain links to other websites of interest. We do not pass any personal data to such websites and once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this **Privacy Policy**. You should exercise caution and look at the privacy statement applicable to the website in question.

9 Data controller and questions about this Privacy Policy

The Data Controller responsible in respect of this **Privacy Policy** is Lynda Tarpey (see [ICO Data Protection Public Register](#)) and she can be contacted by either:

- Write to us at the following address and provide your name, address, phone number and email address:

Hasca Ltd
The Studio
36 Dickson
Cheshunt, Herts, EN7 6HD

- Phone on 01992 633111
- E-mail us at lynda@hascald.co.uk with the words 'Data Controller question' in the email subject

Please contact us with any feedback you have on this **Privacy Policy** so that we can make it as simple and easy to understand as possible.