

ROH TRAINING

Data Protection & GDPR Policy

Business Type: Limited company

Effective Date: September 2026

Policy Owner: ROH Training Ltd

Email: info@rohtraining.co.uk

Website: <https://rohtraining.co.uk>

1. Policy Statement

ROH Training is committed to protecting the privacy, confidentiality and security of personal information.

This policy explains how ROH Training collects, uses, stores, shares and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection laws.

ROH Training will only collect and use personal data where there is a lawful and appropriate reason to do so.

2. Scope

This policy applies to personal data relating to learners, customers, employers, trainers, suppliers, website users, enquirers and other individuals who interact with ROH Training.

It applies to personal data collected through the website, online booking systems, email, telephone, paper forms, training sessions and other business activities.

3. Data Protection Principles

ROH Training will follow the data protection principles. Personal data must be:

- Processed lawfully, fairly and transparently.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date where necessary.
- Kept only for as long as necessary.
- Protected using appropriate security measures.

4. Personal Data We May Collect

Depending on the service provided, ROH Training may collect:

- Full name and contact details.
- Email address and telephone number.
- Employer or organisation details.
- Course booking and attendance information.
- Assessment results and certification details.
- Payment and invoicing information.
- Accessibility or learning support information where voluntarily provided.

- Website enquiry information.
- Information needed to manage complaints, appeals or legal obligations.

ROH Training will avoid collecting unnecessary personal information.

5. How We Use Personal Data

Personal data may be used to:

- Process course bookings and payments.
- Communicate with learners and customers.
- Deliver training and manage attendance.
- Complete assessments and issue certificates.
- Maintain training and business records.
- Respond to enquiries and complaints.
- Provide reasonable adjustments where requested.
- Meet legal, regulatory or contractual obligations.
- Improve our services and administration.
- Send marketing communications where lawful and permitted.

6. Lawful Basis for Processing

ROH Training will identify an appropriate lawful basis before processing personal data. Depending on the circumstances, this may include:

- Contract: to provide booked training or services.
- Legal obligation: to comply with applicable legal requirements.
- Legitimate interests: to operate and manage the business, where these interests are not overridden by an individual's rights.
- Consent: where consent is required, such as certain marketing or optional processing.

Where consent is used, it must be freely given, specific, informed and unambiguous. Individuals may withdraw consent at any time.

7. Special Category Data

Some information, such as health information or information about a disability, may be special category data under UK GDPR.

ROH Training will only collect or use special category data where necessary, with an appropriate lawful basis and an additional condition under data protection law.

Such information will be treated confidentially and shared only with people who need it for a legitimate purpose, such as arranging reasonable adjustments or ensuring safe participation.

8. Sharing Personal Data

ROH Training may share personal data with appropriate third parties where necessary and lawful, including:

- Awarding organisations or certification providers.
- Employers or organisations that arranged or paid for training, where appropriate.
- Booking, payment, website or IT service providers.
- Professional advisers, insurers or legal representatives where necessary.
- Public authorities where legally required.

ROH Training will not sell personal data. Third parties will only receive the information necessary for the relevant purpose and will be expected to protect it.

9. International Data Transfers

Where personal data is transferred outside the UK, ROH Training will ensure that the transfer is made in accordance with applicable data protection law and that appropriate safeguards are in place.

10. Data Security

ROH Training will take reasonable technical and organisational measures to protect personal data from loss, misuse, unauthorised access, alteration or disclosure.

Measures may include:

- Password protection and secure accounts.
- Access limited to people who need the information.
- Secure storage of paper and electronic records.
- Appropriate device and software security.
- Care when sending personal information by email.
- Secure disposal of information when no longer required.

No method of transmission or storage is completely risk-free, but ROH Training will take reasonable steps to reduce risks.

11. Data Retention

ROH Training will retain personal data only for as long as it is reasonably necessary for the purpose for which it was collected, including legal, accounting, insurance, certification and regulatory requirements.

Retention periods will depend on the type of information and the relevant legal or business requirement.

When information is no longer needed, it will be securely deleted, destroyed or anonymised.

12. Data Breaches

ROH Training will take suspected personal data breaches seriously.

A data breach may include personal information being lost, sent to the wrong person, accessed without permission, stolen or accidentally disclosed.

Where a breach occurs, ROH Training will:

- Identify and contain the breach.
- Assess the likely risk to individuals.
- Keep a record of the incident.
- Take steps to reduce further harm.
- Notify the Information Commissioner's Office where legally required.
- Inform affected individuals where required by law or where appropriate.

13. Individual Rights

Subject to applicable legal conditions and exemptions, individuals may have the right to:

- Be informed about how their data is used.
- Request access to their personal data.

- Request correction of inaccurate information.
- Request erasure of personal data.
- Request restriction of processing.
- Object to certain processing.
- Request data portability in applicable circumstances.
- Withdraw consent where processing is based on consent.

Requests should be made using the contact details in this policy. ROH Training may need to verify identity before responding.

14. Cookies and Website Privacy

ROH Training's website may use cookies or similar technologies to operate the website, support bookings, understand website use or remember preferences.

Where required, consent will be requested before non-essential cookies are used.

Further information should be provided in the ROH Training Privacy Notice and Cookie Notice.

15. Marketing

ROH Training will only send marketing communications where there is a lawful basis to do so.

Individuals will be given a clear way to opt out of marketing communications. Opt-out requests will be respected promptly.

Marketing data will not be retained longer than necessary.

16. Children and Young People

ROH Training may provide training relating to children, but it does not normally need to collect personal data directly from children.

Where information about a child is collected, ROH Training will take additional care and ensure that the processing is lawful, necessary and appropriate.

17. Data Protection Responsibilities

ROH Training is responsible for ensuring that personal data is handled in accordance with this policy.

All trainers, staff, contractors and other people who handle personal data on behalf of ROH Training must:

- Keep personal data confidential.
- Use data only for authorised purposes.
- Follow security and retention procedures.
- Report suspected breaches promptly.
- Complete relevant data protection training where required.

18. Complaints

If an individual has concerns about how ROH Training uses their personal data, they should contact ROH Training first so the concern can be investigated.

Individuals also have the right to complain to the Information Commissioner's Office (ICO).

ICO website: <https://ico.org.uk/>

19. Contact Details

For questions, data requests or privacy concerns, contact:

ROH Training

Email: info@rohtraining.co.uk

Telephone: 0207 123 7929

Website: <https://rohtraining.co.uk>

Data Protection Contact: [Roheeda Ullah]

20. Policy Review

This policy will be reviewed regularly and whenever there are significant changes to legislation, business processes, technology or data processing activities.

Last Updated: [September 2026]

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