



Effective Date: [01/09/2023]

### Introduction

This GDPR (General Data Protection Regulation) policy outlines how Lifetime Education and Training collects, processes, stores, and protects personal data in compliance with the European Union GDPR legislation. The policy applies to all employees, contractors, and third parties who handle personal data on behalf of the organization.

### Definitions

- a. Personal Data: Any information relating to an identified or identifiable natural person, including but not limited to names, contact details, identification numbers, and online identifiers.
- b. Data Subject: The individual to whom personal data relates.
- c. Processing: Any operation performed on personal data, such as collection, recording, organization, storage, alteration, retrieval, consultation, use, disclosure, or destruction.
- d. Controller: The entity responsible for determining the purposes and means of processing personal data.
- e. Processor: The entity that processes personal data on behalf of the controller.

### Lawful Basis for Processing Personal Data

We will ensure that personal data is processed lawfully, fairly, and transparently. Our lawful bases for processing personal data will include, but are not limited to, the following:

- a. Consent: Obtaining explicit consent from the data subject for specific purposes, with the option to withdraw consent at any time.
- b. Contractual Necessity: Processing personal data to fulfill a contract or to take pre-contractual steps at the data subject's request.
- c. Legal Obligation: Processing personal data to comply with legal obligations imposed on the organization.
- d. Legitimate Interests: Processing personal data for legitimate interests, provided they are not overridden by the rights and freedoms of the data subject.

### Collection and Use of Personal Data

- a. Consent: We will obtain explicit consent from data subjects before collecting and processing their personal data. Consent will be sought separately for different processing activities and purposes.
- b. Data Minimization: We will only collect and process personal data that is necessary for the specified purposes and will avoid excessive or irrelevant data collection.
- c. Purpose Limitation: Personal data will be processed solely for the purposes for which it was collected, and we will inform data subjects of the intended purposes.



d. Confidentiality and Security: We will implement appropriate technical and organizational measures to ensure the security and confidentiality of personal data.

#### Data Subject Rights

a. Right to Access: Data subjects have the right to request access to their personal data, including information about the purposes of processing, the categories of personal data, and the recipients of their data.

b. Right to Rectification: Data subjects have the right to request the correction of inaccurate or incomplete personal data.

c. Right to Erasure: Data subjects have the right to request the erasure of their personal data under certain circumstances, such as when the data is no longer necessary or when consent is withdrawn.

d. Right to Restriction of Processing: Data subjects have the right to request the restriction of processing their personal data in specific circumstances.

e. Right to Data Portability: Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and have the right to transmit that data to another controller.

f. Right to Object: Data subjects have the right to object to the processing of their personal data in certain circumstances, including direct marketing.

#### Data Retention

We will retain personal data for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law. Personal data will be securely disposed of when it is no longer needed.

#### Data Breach Notification

In the event of a data breach involving personal data, we will promptly assess the risk to individuals' rights and freedoms and, if necessary, notify the supervisory authority and affected data subjects as required by law.

#### Data Protection Officer (DPO)

Paul Rowlandson will serve as the Data Protection Officer responsible for overseeing GDPR compliance and acting as the primary point of contact for data subjects and supervisory authorities.

#### Data Processing Agreements

When engaging third-party processors who handle personal data on our behalf, we will ensure that appropriate data processing agreements are in place to protect the rights and freedoms of data subjects.

#### Training and Awareness

We will provide regular training to our employees and contractors on their responsibilities regarding data protection, privacy, and GDPR compliance.



### Policy Review

This GDPR policy will be reviewed periodically to ensure its ongoing relevance and effectiveness. Any necessary updates will be made to reflect changes in applicable laws and regulations.

### Contact Information

For any questions, concerns, or requests related to this GDPR policy or the handling of personal data, please contact our Data Protection Officer at Paul Rowlandson - 07760720930

By implementing this GDPR policy, Lifetime Education and Training aims to protect the privacy and data rights of its students, employees, and other individuals whose personal data is collected and processed.