

Privacy and GDPR Policy

Implementation Date: October 2025

Review Date: October 2028

Rob Ward Consulting Ltd (Trading as RWC Training)

Privacy and GDPR Policy

Last updated: October 2025

1. Introduction and General Information

RWC Training ("We," "Us," or "Our") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, process, and protect your personal data in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

Data Controller:

- Company Name: Rob Ward Consulting Ltd (Trading as RWC Training)
- Contact Person/Data Protection Point of Contact: Rob Ward, Managing Director
- Address: RWC Training, 6 Vincent Avenue, Crownhill Business Centre, Milton Keynes, MK8 0AB
- Email Address: info@rwctraining.co.uk
- Telephone Number: 01908 969 992

We are the 'data controller' of the personal data you provide to us. This means we determine the purposes and means of processing that personal data.

2. The Personal Data We Collect

We collect and process various categories of personal data, primarily when you enquire about, book, or attend our training courses.

Category of Data	Examples of Data Collected
Identity Data	Name, title, date of birth.
Contact Data	Billing address, email address, telephone numbers.
Course & Performance Data	Course enrolled in, attendance records, test/exam results, unique learner/candidate numbers (if applicable).

Financial Data	Payment card details (processed securely via a third-party payment provider and not stored by us), billing information, payment history.
Technical Data	Internet Protocol (IP) address, browser type and version, time zone setting, operating system, and platform (collected when you use our website).
Marketing Data	Your preferences in receiving marketing from us.
Accessibility/Special Category Data (Only when necessary)	Information about any special requirements, medical conditions, or accessibility needs you may have to participate fully in a course (e.g., dietary restrictions, learning adjustments).
Website Usage Data	Information about your visit, including what pages you visit, how long you are on the site, how you got to the site (including date and time), page response times, length of visit, what you click on, documents downloaded and download errors.

3. How We Collect Your Personal Data

We collect data from the following sources:

- **Direct Interactions:** You provide us with your data by filling in forms (including contact/enquiry forms on our website), booking a course, corresponding with us by email or phone, or creating an account on our learning or course booking platform.
- **Third Parties:** We may receive personal data from third parties, such as:
 - Your employer, if they book a course for you.
 - Qualification or accreditation bodies that process your certification.
 - Referral sources or joint marketing partners.
 - Analytics providers (e.g., Google Analytics).

3.1 Data Collection Specific to Website Visitors

This section sets out how we process personal data collected from you or that you provide to us specifically through our website. By visiting our website, you are accepting and consenting to the practices described below.

Information We Automatically Collect About You

With regard to each of your visits to our website, we may automatically collect Technical Information and Website Usage Data (as described in Section 2). This data is collected anonymously and is not linked to information that identifies you as an individual. We use Google Analytics to track this information.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Use of Information Supplied via the Website

We will use information you supply to us via website forms, such as contact/enquiry forms, to:

- Provide you with the information and/or services that you request from us.
- Collect any additional personal data you may provide to us from time to time if you contact us by email, letter, or telephone through our site, by submitting a comment, or by any other means.
- Process survey responses so we can review and continue to improve our services.

Use of Automatically Collected Information

We will use the automatically collected information to:

- Administer our site, including troubleshooting and statistical purposes.
- Improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- Ensure security and debugging as part of our efforts to keep our site safe and secure.

4. Legal Basis and Purposes for Processing

We will only process your personal data when the law allows us to. For RWC Training, the most common legal bases for processing your personal data are:

Legal Basis (GDPR Article 6)	Purpose of Processing	Categories of Data Used
Contractual Necessity	To process your course booking, provide you with access to the training, issue certificates, and process payment.	Identity, Contact, Course & Performance, Financial
Legitimate Interests	To improve our services, manage our business, prevent fraud, administer our site (including troubleshooting and statistical purposes), ensure content is presented in the most effective manner, security, and debugging as part of our efforts to keep our site safe and secure, or conduct non-intrusive internal analysis of course uptake and performance.	Identity, Course & Performance, Technical, Website Usage Data
Legal Obligation	To comply with statutory and regulatory requirements (e.g., tax, health and safety, or mandatory reporting to an awarding body).	Identity, Contact, Financial, Course & Performance

Consent	To send you promotional emails about new courses, events, or services (where we cannot rely on legitimate interests). You have the right to withdraw consent at any time.	Contact, Marketing
Explicit Consent	To process any Special Category Data (e.g., information on a disability to arrange an adjustment). This consent is freely given and can be withdrawn.	Accessibility/Special Category Data

5. Sharing Your Personal Data

We may need to share your personal data with the following types of third parties for the purposes set out above:

- **Awarding Bodies/Accreditation Bodies:** If your course leads to a formal qualification, we are legally required to share your name, contact details, and course performance data to register you and issue your certificate.
- **Service Providers:** Third-party providers who support our business operations, such as payment processors, IT support, learning management system (LMS) providers, email marketing platforms, trusted third-party website and hosting providers to facilitate the running and management of this website, and analytics providers (e.g., Google Analytics). Any information you provide to us will either be emailed directly to us or may be stored on a secure server using a trusted third-party website and hosting provider to facilitate the running and management of this website. Your data may be shared with our trusted, third-party operating systems which we use to manage our services and keep in touch with you. We do not rent, sell or share personal information about you with other people or non-affiliated companies.
- **Your Employer:** If your employer paid for or nominated you for the course, we will share your attendance, completion status, and assessment results with them as part of our contract with them.
- **Professional Advisers:** Lawyers, bankers, auditors, and insurers who provide professional services to us.
- **Regulators and Authorities:** HM Revenue & Customs, regulators, and other authorities based in the UK and other relevant jurisdictions who require reporting of processing activities.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions and a formal Data Processing Agreement.

6. International Transfers

We strive to keep your personal data within the UK/EEA. However, some of our external third-party service providers (e.g., cloud storage, email platforms) may be based outside the UK/EEA.

If we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- Transferring your data to countries that the European Commission or the UK government has deemed to provide an adequate level of protection for personal data.
- Using specific contracts approved for use in the UK/EEA that give personal data the same protection it has in the UK/EEA.

7. Data Security

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.

We take the security of your data seriously. However, you should be aware that the transmission of information via the internet always carries some risk, and we cannot guarantee the complete security of data transmitted to our site. Any such transmission is therefore at your own risk. Once we have received your information, we will apply our strict procedures and security features to prevent unauthorised access.

In addition, we limit access to your personal data to employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data 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 any applicable legal requirements.

- Course Attendance and Certification Records: Generally kept for a minimum of 3 years and a maximum of 6 years, or as required by the relevant awarding body.
- Financial/Transaction Records: Kept for 6 years after the transaction.
- Marketing Consent: Kept until you withdraw your consent.

9. Your Legal Rights

Under GDPR, you have the following rights in relation to your personal data:

- The Right to be Informed: To be informed about how your data is collected and used (this Privacy Policy serves this purpose).
- The Right of Access: To request a copy of the personal data we hold about you.

- The Right to Rectification: To have any inaccurate or incomplete personal data corrected.
- The Right to Erasure (Right to be Forgotten): To ask us to delete your personal data, under certain conditions.
- The Right to Restrict Processing: To ask us to suspend the processing of your personal data, under certain conditions.
- The Right to Data Portability: To request that we transfer the data we have collected to another organisation, or directly to you, under certain conditions.
- The Right to Object: To object to our processing of your personal data, under certain conditions, especially where we are relying on a legitimate interest.
- Rights in relation to Automated Decision Making and Profiling: We do not currently use your personal data in a way that involves automated decision-making or profiling with legal or similarly significant effects.

To exercise any of these rights, please contact us using the details provided in Section 1.

10. Third-Party Links

Our site may, from time to time, contain links to and from third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies, and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. How to Complain

If you have any concerns about our use of your personal information, you can make a complaint to us directly at info@rwctraining.co.uk.

You also have the right to lodge a complaint with the supervisory authority for data protection in your country. In the UK, this is the Information Commissioner's Office (ICO).

- The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- The ICO helpline number: 0303 123 1113
- ICO website: <https://www.ico.org.uk>

12. Changes to this Privacy Policy

We may update this policy from time to time. The latest version will always be posted on our website and will be effective from the date of the "Last Updated" field at the top of this document. We will notify you of any significant changes where appropriate.

Signature:

Name Print: Rob Ward

Position/Role: Managing Director

Date: October 2025

Date of review: October 2028