



Privacy Policy

We respect your right to privacy. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. This Privacy Policy should be read alongside, and in addition to, the Terms and Conditions and the Cookies Policy. Please read this Privacy Policy carefully.

About this Policy

CMT Training Services Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. This Privacy Policy sets out how CMT Training Services Limited collects and processes your personal data. We will take all reasonable steps to ensure that personal data is safeguarded and kept in accordance with applicable data protection law.

By providing us with your data, you warrant that you are over 16-years of age.

Who we are

In this Privacy Policy, references to “we” or “us” are to CMT Training Services Limited. A company incorporated in England and Wales we are registered with registration number 13167098 and our registered address is Oakley House, Headway Business Park, 3 Saxon Way West, Corby, Northamptonshire NN18 9EZ. We are registered with the Information Commissioner’s Office (ICO) for data protection reference number ZB043534. We will be the controller of any personal data processed as described in this Privacy Policy.

For the purposes of the General Data Protection Regulation (GDPR) and relevant legislation we are a Data Controller and recognise and act on our obligations under applicable data protection law. For any issues relating to data protection, we have an appointed Data Protection Officer (see below for contact details).

Please refer to our Data Protection and GDPR Policy for more information.

Services

Our services may include (without limitation) audio visual content, text, photographs, advertising and other product sales which we may offer on our website or media platforms which, for example, may enable you to view our content over a mobile or wi-fi network (the “Services”). This policy covers all of these Services (but not limited to) and any reference to “you” or “your”, means you as a user of our Services. This policy applies to the collection and use of your information by us and parties that we authorise (such as our suppliers and sub-contractors).

How we collect information

When you access the website via any means, use the content, register, respond to or participate in any survey or questionnaire sent to you by us, make an enquiry, correspond with us by phone, email or otherwise, or make a purchase with us we may collect, store and use certain of your personal information in line with this policy.

What personal data do we collect?

To register on the website and/or to book a course, we ask for your name, company name, address, telephone number and email address. We may also ask you about you or your delegates’ gender, date of birth, National Insurance number and qualifications to understand more about you/them (depending on the course you wish to undertake). We will also store the results of your assessments relating to courses and content. If you contact us, we may also keep a record of that correspondence. When you make a purchase, our payment service provider, will also collect and process your credit card or other payment details.

We may also collect data relating to your visits to the website that cannot identify you but records your use of our website and content including, but not limited to details of how long you have used the website, on which browser/device type and content.

We may also collect your computer’s IP address to help us tailor the service to your location.



How we use your information

We use your information for many purposes, including:

- To fulfil any contractual agreements between you and us;
- To send you course-specific email notifications and updates about courses you are enrolled on;
- In order to provide third party goods or services available through our website, including (but not limited to) confirmation of the courses you have participated in and/or the award you have achieved as a result (if applicable) for accreditation purposes
- Analyse your website behaviour;
- To comply with legal and regulatory requirements;
- To allow you to use the full range of features on or via our website;
- Target our online advertising to your interests and preferences;
- Measure and understand the effectiveness of our online content and marketing;
- To contact you occasionally in order to invite you to share your opinions and experiences of CMT Training Services;
- In order to contact you when your certificate/qualification is due for renewal;
- If you have paid to take part in a course, to send you details of our other products and services which we think may interest you, unless you opt out; and
- To provide, maintain, protect and improve the quality of the website and content we offer, including by conducting anonymised market research.

Legal basis for processing your information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to fulfil a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we will also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to fulfil a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests we will make clear to you at the relevant time what those legitimate interests are.



Contact enquiry form

We use a form to collect your first and last name, email and phone number as well as your message, so that we can contact you and provide details of our services to you and deal with general company enquiries. Data is held on the grounds of being legitimate to our business interests.

Emails

We retain copies of emails sent to us in order to provide our services and deal with other company business. Your personal information will be held by us in accordance with this Privacy Policy and will be on the basis of being legitimate to our business interests.

Interest in our services

If you complete our form to express an interest in our training sessions, we will collect your first and last name, email and phone number, so that we can contact you and provide details of our training services to you. Personal data will be processed on the basis of being legitimate to our business interests.

If you wish to sign up for details of our training courses and dates, we will ask for your first name, last name and email address so that we can send relevant details to you. Personal data will be processed on the basis of being legitimate to our business interests.

Phone calls

Records of phone calls (and notes) may be retained by us so that we can communicate with you. The data will be held on the basis of being for our legitimate business needs or in order to fulfil our contractual obligations if you are a client of ours.

Email marketing

We may contact you if we have expressly asked for, and obtained, your consent to do so or if we have a legitimate interest to do so i.e. a customer relationship with you. If you give consent, this can be withdrawn at any time. See 'Your Rights' below.

We will not pass or sell your personal information on to third parties outside of CMT Training Services.

Social media

We use social media to engage with users on Facebook, Google+, LinkedIn, and Twitter. We do not keep any specific data that identifies you as an individual user, but hold details of our followers on these platforms. You should refer to the Privacy Policies of these channels to understand how they treat your data in relation to linking to our site.

Facebook: <https://www.facebook.com/privacy/explanation>

Google+: <https://privacy.google.com/>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Twitter: <https://www.twitter.com/en/privacy>

YouTube: <https://policies.google.com/privacy>

If you send us a message on social media, the details may be retained by us only as relevant to any ongoing contract or to further our legitimate business interests or as required for legal purposes. The third party provider may also retain details in accordance with their Privacy Policy.

Subscription to our email updates

If you subscribe online to our email updates you will be asked to give us your full name and email address so that we can send these to you. Data is processed on the basis of your consent which can be withdrawn at any time. See 'Your Rights' below. Your attention is drawn to this Privacy Policy before submitting your details.



Testimonials

We may ask you for a testimonial in relation to our services that may be used on our website or social media. Your full name and company may be used. Data is only published on the basis of valid consent obtained from you.

Children

We do not market this website at those under 18 years old. Consistent with the GDPR we will never knowingly request personally identifiable information from anyone under the age of 16 years old.

We will take appropriate steps to delete any personal data of individuals less than 16 years of age that has been collected on our website upon learning of the existence of such data.

Special categories of data / sensitive data

Some of the information you provide to us may be considered sensitive personal data which includes information about a data subjects ethnic or racial origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life or criminal record. We will take extra measures where appropriate to protect such data.

Other sources of Information

Information collected automatically

We automatically collect information from your browser when you visit our website. Data is stored in log files when you interact with our website or service. This information includes internet protocol (IP) addresses as well as browser type, operating system, identification numbers associated with your devices, time of access, and error logs.

Information we get from other sources

From time to time, we may need to obtain information from third parties. This may apply to obtaining marketing contact details from third parties. This will apply where it is necessary to provide our services to you, on the basis of our legitimate interests, or as permitted by law.

Sharing Information

Disclosure

We don't share, sell, or distribute your data to third parties, except as contractually agreed with you or as provided in this Privacy Policy.

We may disclose your personal data to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy.

In addition, we may disclose personal data in the following circumstances:

- where we are required to do so by law;
- in connection with any legal proceedings or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.

Awarding Bodies

We share personal data with the Awarding Bodies of our accredited courses and other organisations that support the training and certification of our learners. We take appropriate measures to ensure that all personal data provided to these organisations (as Data Processors) is processed in accordance with applicable data protection laws and regulations.



Data Processors

CMT Training Services Limited may use Data Processors who act on our instruction in relation to the management of your data and they must adhere to all data protection laws and regulations. We will ensure that any Data Processors used only operate on our written instructions and comply with their obligations under the GDPR. You will be informed of any other Data Controllers who have access to your data and who may determine processing activities separately to us, or as a Joint Data Controller.

The data processors include, but are not limited to:

- Salesforce.com, Inc
- Oneflow AB
- Microsoft Office 365

External links

CMT Training Services Limited provides links to third party websites. Users are advised to take care when clicking on any external web link as this will take the user away from our website. Once you leave our website, you are no longer governed by this Privacy Policy or our website's terms and conditions. We cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk. CMT Training Services Limited and its owners cannot be held liable for any damages, or the consequences of visiting any external links.

CMT Training Services use a third party, Mailchimp, for designing and sending e-shots (i.e. marketing communications) to our marketing contacts. All data subjects have rights in relation to the processing of such information (see below, Your 'Rights') and users are advised to read the Privacy Policy at: <https://mailchimp.com/legal/prior-privacy-policy/>

Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to our terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care in regard to their own privacy and personal details. This website nor its owners will not ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

Payment processing

CMT Training Services Limited does not accept payment for services online and does not store or process payment data on our servers. We do not share financial details with 3rd parties.

Payments made directly to us do not require us to process your personal data and only transactional data will be held, both in our manual and electronic filing systems.

Data Retention

We keep your personal data in accordance with our Data Retention Policy which reflects our needs to provide services to you as contracted and also as required to meet legal, statutory and regulatory obligations.

We retain personal data for the qualifications achieved by our learners, which is stored for lifetime via the registered awarding bodies and learner records services. You will have the right to access your learning records at any time.

The need to hold information is regularly reviewed and data will be disposed of when no longer required.



Data Security

Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

However, we cannot guarantee the security of data transmitted to us. Any transmission is at your own risk.

Data Storage

We keep and manage learning records for our customers in our own secure storage systems, in accordance with the requirements of the GDPR. This ensures secure access to personal learning records, when required.

We only store data with organisations that support the training and certification of learners, none of these are based outside of the EU.

Data Transfers

Our website is hosted in the EU. We take appropriate steps to ensure a safe processing of personal data, however, we cannot guarantee the security of data transmitted through our website or by email. Any transmission is at your own risk.

Any information that you supply to us may be stored and processed by us in accordance with this Privacy Policy. Your data will only be transferred to countries within the EEA or to a country that has 'adequate' safeguards in place (as determined by the European Commission), or as permitted by relevant data protection laws.

When we share data, it may be transferred to, and processed in, countries outside of the EEA that have been identified as providing adequate protection for EEA data, or to a third party where we have approved transfer mechanisms in place to protect your personal data i.e. by entering into the European Commission's Standard Contractual Clauses, or by ensuring the entity complies with the EU-US Privacy Shield.

Your Rights

CMT Training Services Limited recognises a data subjects rights and will uphold these in accordance with data protection laws. If you wish to invoke any of these rights, you should contact the person responsible for data protection by emailing compliance@cmttrainingservices.com. Further information about your rights can also be obtained from the Information Commissioner's Office (see complaints below) or your local Citizens Advice Bureau.

You are entitled to see the information held about you in relation to the following:

Subject access requests

Data subjects (i.e. individuals) have the right to access personal data that is held by submitting a subject access request (SAR) to CMT Training Services Limited. All subject access requests should be made in writing. See 'Contact Us' below for our address. We may send you a Subject Access Request Form to facilitate and simplify the process.

There is not normally any charge for a subject access request, except if your request is 'manifestly unfounded or excessive'.

We aim to respond to a subject access request within 14 days and, in any case, within one month of receiving the request and necessary information. We aim to provide a complete response, including a copy of your personal data within that time, however, if your request is more complex, the response time may be extended up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

Right to rectification

Data subjects have the right to request that we amend or change personal information that is inaccurate or incorrect.



Right to erasure

Data subjects have the right to ask us to delete personal information from our systems without giving any reason and at any time. We will act on any such request without delay.

Right to restrict processing

Data subjects have the right to rectification or erasure of personal data in the following circumstances:

- Personal data is not accurate;
- The processing of data is unlawful – data subjects may request that processing is restricted;
- Data is required to exercise legal rights or defend legal claims;
- Data is unlawful (there may be lawful grounds for processing, which override this right).

Right to data portability

Data subjects have the right to obtain and request the transfer of their data to different service providers.

Right to object

Data subjects have the right to object to the processing of data at any time based on their particular situation. This includes objecting to profiling unless it is in the 'public interest' or exercised lawfully by an official authority. We will only process data under lawful grounds.

Right not to be subject to decisions based on automated processing

We collect data through tracking codes and email marketing software, which tell us when you open our emails and which links you choose to click.

Data Breaches

We will report any unlawful breach of data as required by the GDPR within 72 hours of the breach occurring, if it is considered that there is an actual, or possibility, that data within our control including the control of our data processors, has been compromised. If the breach is classified as 'high risk' we will notify all data subjects concerned using an appropriate means of communication. We will report any relevant breaches to the ICO, see below.

Complaints

If you want to raise a concern about the use of your data, you can contact us by email to compliance@cmtrainingservices.com. Alternatively, you can formally raise a concern or complaint to the Information Commissioner's Office (ICO) directly on 0303 123 1113, or see the options for reporting issues on <https://ico.org.uk/concerns/>



Legal Information

No Waiver

No failure or delay by us in exercising any of our rights in accordance with this Privacy Policy or our terms and conditions shall be deemed to be a waiver of that right, and no waiver of a breach of any provision of the Agreement shall be deemed to be a waiver of any subsequent breach of the same or any other provision.

Severance

If one or more of the provisions of this Privacy Policy or our terms and conditions is found to be unlawful, invalid or otherwise unenforceable, those provision(s) shall be deemed severed from the remainder of these terms and conditions and shall remain enforceable.

Third Party Rights

The terms of this Privacy Policy shall not confer rights on any third parties and accordingly the Contracts (Rights of Third Parties) Act shall not apply.

Jurisdiction and Governing Law

The terms of this Privacy Policy and all disputes, whether contractual or otherwise, arising out of or in connection with the policy are governed by and shall be construed in accordance with the laws of England and Wales and each party submits to the exclusive jurisdiction of the English courts.

Changes to this Policy

From time to time we may change this policy and any changes will be posted on the website. You will be deemed to have accepted the terms of the Privacy Policy on your first use of the website following the alterations. We recommend that you check this page regularly to keep up-to-date.

Contact Us

If you have any concerns regarding the processing of data, you can contact the Data Control Officer by the following.

Email: compliance@cmtrainingservices.com

Telephone: 020 4511 2493

Post: Oakley House, Headway Business Park, 3 Saxon Way West, Corby, Northamptonshire NN18 9EZ