

# Sirius Business Services Ltd

## Privacy Policy

Sirius Business Services Ltd (SIRIUS) will process your personal data, and special category data, in accordance with the General Data Protection Regulation (GDPR) and any regulatory requirements as specified by Regulatory Bodies.

### LEARNER DATA

For learners SIRIUS will only process and store your data for the purposes of the delivery, assessment and award of the qualification you have chosen to undertake and for no other purpose.

SIRIUS will not sell, pass on or make available your personal, or special category data, to any other person or body outside of the administration and award of the qualification you have chosen to undertake.

SIRIUS will undertake the following administrative activities in relation to the processing and transfer of your personal and special category data:

1. SIRIUS and the Awarding Body will collect your name, date of birth and email address for the purposes of administrating and awarding/certificating the qualification you have chosen to undertake. Your gender and postcode will also be collected and processed if you request that your achievement is uploaded to your Personal Learning Record.
2. SIRIUS and the Awarding Body offers you the ability to apply for a reasonable adjustment should you have a disability, learning need or medical condition that may affect your ability to undertake the qualification's assessment. The data collected for this purpose is called special category data. SIRIUS and the Awarding Body will only collect and process this special category data when it is provided by you and for the purposes of recording and awarding reasonable adjustments for the qualification you are undertaking at the time of providing the data.
3. Such personal data and special category data will not be used by SIRIUS or the Awarding Body for any purpose other than the delivery, assessment, administration and quality assurance of the qualification undertaken and for maintaining appropriate records in line with Regulatory Body requirements.
4. Personal data and special category data is collected within SIRIUS and the Awarding Bodies course paperwork/documentation during course delivery. The data will be transferred to SIRIUS's administration system and to the Awarding Bodies online administration system, and all records will be maintained/disposed of in line with the our Data Protection Policy. The transfer of learner data to the Awarding

Bodies online system is required as part of the process of administrating and awarding qualifications.

5. SIRIUS and the Awarding Body is required to respond to information requests from Regulatory Bodies to fulfil their regulatory function. Should your data be required to be transferred to the Regulatory Body, SIRIUS will do so in line with its Data Protection Policy. The same process will be used if SIRIUS is legally required to transfer data as part of a legal investigation to a legal authority.

6. If you have not reached the age of 16, you may first wish to discuss this Privacy Notice with your parent, guardian or carer.

7. SIRIUS and the Awarding Body will retain your personal and special category data indefinitely to provide confirmation of your achievement at any point in the future, should it be required. An individual can request that their data is deleted at any stage.

8. Under the GDPR you have certain rights in respect of your personal and special category data. Not all GDPR rights are applicable due to the limited way in which SIRIUS and the Awarding Body hold and process your data, but the following rights are appropriate:

- **Right to access** to the information we hold on you. This will be provided to you free of charge within one calendar month of your request.
- **Right to rectification.** Should any of the data SIRIUS or the Awarding Body hold on you be incorrect you have the right for this to be rectified. SIRIUS and the Awarding Body will always strive to enter data accurately, but should you notice an error please contact us and we will rectify any inaccuracies.
- **Right to erasure.** SIRIUS and the Awarding Bodies are required to process your personal data (name, email address and date of birth and gender and postcode if given), and special category data (in the case of a reasonable adjustment being awarded due to a medical condition, disability or learning need), to administrate the award of your qualification. SIRIUS and the Awarding Body are also required to maintain the records of your training for a minimum of three years to satisfy regulatory requirements. Should you wish for your data to be deleted after this time has lapsed we will do so upon request.

## CLIENT DATA

For personal data and special category data obtained from clients in respect of SIRIUS's Consultancy and Advisory services we will only process and store your data for the purposes of the delivery of our service to our client for the investigation of, and advising on safeguarding, security, fire, accidents, incidents and other health and safety matters and for no other purpose.

SIRIUS will not sell, pass on or make available your personal, or special category data, to any other person.

SIRIUS will undertake the following administrative activities in relation to the processing and transfer of your personal and special category data:

1. SIRIUS will collect personal data for the purposes of investigating or advising on safeguarding, security, fire, accidents, incidents and other health and safety matters. This may include the following personal and special category data:

<b>Data Item</b>	<b>Category of Data</b>
Name of member of staff, customer or member of the public	Personal data
A work postal address	Personal data
A home postal address	Personal data
Phone number	Personal data
Email address	Personal data
Any disability	Special Category Data
Any medical condition	Special Category Data
Any learning need	Special Category Data
Any injury sustained	Special Category Data
Any treatment given	Special Category Data
Where treatment was given	Special Category Data
Criminal records and convictions	Special Category Data

2. SIRIUS will only collect and process special category data when it is provided by the client or the data subject themselves for the purposes stated above.

3. Such personal data and special category data will not be used by SIRIUS for any purpose other than the purposes of investigating or advising on safeguarding, security, fire, accidents, incidents and other health and safety matters and for maintaining appropriate records in line with legal and Regulatory Body requirements.

4. Personal data and special category data is collected by SIRIUS through the supply of accident or incident reports, other written reports, interviews or verbal information from clients or data subjects. All records will be maintained/disposed of in line with our Data Protection Policy.

5. SIRIUS is required to respond to information requests from Regulatory Bodies to fulfil their regulatory function. Should your data be required to be transferred to a Regulatory Body, SIRIUS will do so in line with its Data Protection Policy. The same process will be used if SIRIUS is legally required to transfer data as part of a legal investigation to a legal authority.

6. If you have not reached the age of 16, you may first wish to discuss this Privacy Notice with your parent, guardian or carer.

7. SIRIUS will retain your personal and special category data only as long as necessary to undertake its functions, or fulfil its contract with the client, unless we are required by contract or legal requirement to hold it longer. An individual can request that their data is deleted at any stage.

8. Under the GDPR you have certain rights in respect of your personal and special category data. Not all GDPR rights are applicable due to the limited way in which SIRIUS hold and process your data, but the following rights are appropriate:

- **Right to access** to the information we hold on you. This will be provided to you free of charge within one calendar month of your request.
- **Right to rectification.** Should any of the data SIRIUS hold on you be incorrect you have the right for this to be rectified. SIRIUS will always strive to enter data accurately, but should you notice an error please contact us and we will rectify any inaccuracies.
- **Right to erasure.** SIRIUS are required to process your personal data, and special category data to undertake their consultancy and advisory services. SIRIUS are also required to maintain some records to satisfy various legal or regulatory requirements. Should you wish for your data to be deleted after statutory retention periods have lapsed we will do so upon request.

### **POLICY REVIEW**

SIRIUS will review this policy on a regular basis to ensure its effectiveness and taking into account any feedback. Should you have any feedback regarding this policy then please contact SIRIUS as below.



**Gary Hepburn**  
**Managing Director**

10 May 2018