

## Red Dragon First Aid

### Data Protection and Privacy Policy



Red Dragon First Aid  
146 Claremont  
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NP20 6PP  
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## 1. Overview

**1.1** The goal of this Data Protection and Privacy Policy is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of **commissioned processing**. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

**1.2** The General Data Protection Regulation (GDPR) is a regulation, which requires any business that processes data belonging to UK & EU citizens to protect it and not misuse it. As a responsible First Aid Training Provider/Centre, Red Dragon First Aid aims to robustly implement the requirements of the GDPR. Part of meeting the obligation of GDPR is the production and implementation of this policy.

## 2. Responsibilities

**2.1** **Red Dragon First Aid** is responsible for determining what personal data is stored and how it is used therefore Red Dragon First Aid is a Data Controller, in relation to the GDPR.

**2.2** **Red Dragon First Aid** is also required by our Awarding Organisation (ITC First) to collect and pass on personal data to allow them to process and awarded regulated and non-regulated First Aid qualifications.

**2.3** **Red Dragon First Aid's** Responsible Officer for Data Protection is – Denis Mills, Director, Red Dragon First Aid, 146 Claremont, Malpas, Newport, Gwent, NP20 6PP

For details attaining to our Awarding Organisation (ITC First) Data Protection and Privacy Policy please contact ITC First's Data Protection Officer -- Mark Moore, Chief Executive Officer - ITC First, The White House, 4 Church Square, Hartlepool, TS24 7EQ

## 3. Purposes – Why does Red Dragon First Aid collect individuals Data?

**3.1** **Red Dragon First Aid** collects and processes individual data in order that ITC First can attribute learner's achievement to qualifications. Learners must supply their data to allow qualification credits to be awarded and a commemorative certificate to be produced by ITC First.

To receive reminders both from ITC First & **Red Dragon First Aid**, of when time-limited license to practice qualifications expire and to receive important updates or news associated with these qualifications. Without Learners data, ITC First are unable to award qualifications, and therefore produce qualification certificates, as Red Dragon First Aid/ITC First would be unable to attribute a learner's evidence to the learner.

**3.2** The legal basis for collecting and processing data falls under the *Legitimate Interests*, heading of the GDPR.

**3.3** Where Red Dragon First Aid intends to gather or use data outside the scope of *legitimate interests*, Red Dragon First Aid and the GDPR require that individual consent must be explicitly gained. **Red Dragon First Aid** will seek individual consent in the following circumstances: - Opting in to marketing communications

Individuals have the right to remove their consent at any time following its explicit permission. Consent can be revoked by following unsubscribe links on marketing emails and by making a subject access request, completing the Data Request Form (DRF) and following the process described in Appendix 2.

## 4. Types of data collected, processed and passed on to ITC First

**4.1** Red Dragon First Aid regularly collects, retains and passes on the following data to ITC First:

- a) First Name, Surname
- b) Email
- c) Telephone
- d) Mobile
- e) Address
- f) Date of birth

Which allow learners to be awarded credit associated with qualifications.

**4.2** Red Dragon First Aid also collects, retains and passes on special category (sensitive data) e.g.

- a) Gender
- b) National Identity
- c) Ethnic Group
- d) Special needs

Which are required by ITC First to monitor and regularly report on, as they are obliged to by our/their external qualification regulators (Ofqual). The provision of the aforementioned data by learners is not mandatory.

**4.3** Red Dragon First Aid's Website Online Booking Process requires the Individual or Person responsible for booking to provide Red Dragon First Aid with the following details:

- a) Name of person responsible for booking/payment
- b) Their position within organisation
- c) Company or individuals name
- d) Invoicing address
- e) Contact telephone number
- f) Email address
- g) how did you hear about us?
- h) Number of places required
- i) Attendee names and email addresses (for the purpose of sending learner pre-course information and venue directions/map).

## **5. Data Storage**

**5.1** Red Dragon First Aid retains a full hard copy (not original) of all learner/course paperwork which is stored in locked office cabinets in a locked premises. The original copy of all learner/course paperwork is scanned and securely sent via e-mail to ITC First for processing and retention.

**5.2** Electronic data is stored on password protected, encrypted computers with an electronic back up on a password protected, encrypted external hard drive.

**5.3** Red Dragon First Aid/ITC First securely stores individual learners data for 5 years from the date of awarding (certificate date). Following the 5 year period, all physical records are securely destroyed and all electronic records are anonymised.

**5.4** Red Dragon First Aid are required by ITC First to gather ALL the data listed in points **4.1** & **4.2** on each individual. This data in turn is entered by Red Dragon First Aid onto ITC First's secure website registration engine.

**5.5** Red Dragon First Aid accepts no responsibility for any data breaches relating to ITC First's handling of your data. For details of ITC First's Data Protection and Privacy Policy please visit [www.itcfirst.org.uk](http://www.itcfirst.org.uk) and click on "Policies and Procedures". Alternatively you can contact ITC First directly by Telephone on 0345 370 7610.

**5.6** Red Dragon First Aid's Website/Online Booking Process is password protected, encrypted. Only Red Dragon First Aid's director and the website host/designer 1&1 Ionos have access.

**5.7** Red Dragon First Aid accepts no responsibility for any data breaches relating to 1&1 Ionos handling of your data.

## **6. Data processing and usage**

**6.1** When individuals provide their data to Red Dragon First Aid, the data is used to:

- a) Attribute qualification credits to learners (ITC First)
- b) Produce commemorative certificates (ITC First)
- c) Produce CPD certificates (ITC First)
- d) Receive information pertinent to qualifications (Red Dragon First Aid/ITC First)
- e) Enable Red Dragon First Aid/ITC First to contact you at your request (depending on when your data is provided and in which specific context or interaction with Red Dragon First Aid/ITC First)
- f) Monitor ITC First qualifications to ensure equality and inclusivity (ITC First)

**6.2** Red Dragon First Aid only uses data for the legitimate purposes described above, any changes to the ways in which Red Dragon First Aid uses individual's data will be communicated to those individuals affected.

**6.3** Red Dragon First Aid, as an approved Centre acting on behalf of ITC First, gather and submit learner data securely via the ITC website and/or registered post. As a Centre, Red Dragon First Aid sign a legally binding Centre Agreement, which confirms that the Centre agrees to publish and implement a Data Protection Policy, act on direction from ITC First, respond to any action plan provided by ITC First and abide by any sanction applied by ITC First.

## **7. The rights of the individual**

**7.1** Under the GDPR individuals have rights associated with their data, described below:

- a) The right to be informed
- b) The right of access
- c) The right to rectification
- d) The right to erasure
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object
- h) Right in relation to automated decision making and profiling

## **8. Children's Personal Data**

**8.1** Children must have parental (or an individual in loco-parentis) consent for Red Dragon First Aid/ITC First to collect and process their data. Red Dragon First Aid/ITC First will maintain evidence of consent using the learner registration process. For the benefit of this policy a child is classed as a young person under the age of 16.

## **9. Subject Access Requests**

**9.1** All subject access requests in relation to individual rights above must be made using form DRF (appendix 2) and sent either electronically to [reddragonfirstaid@btinternet.com](mailto:reddragonfirstaid@btinternet.com) or by post to Red Dragon First Aid, 146 Claremont, Malpas, Newport, Gwent, NP20 6PP.

**9.2** Red Dragon First Aid will acknowledge all subject access requests within 2 working days and will process and respond to all subject access requests within 1 calendar month of receiving suitable identification, as per Red Dragon First Aid's obligations under the GDPR.

**9.3** To prevent unscrupulous or fraudulent subject access requests Red Dragon First Aid require all access requests to be made using form DRF that requires the individual to authenticate their request. Subject access requests will only be fulfilled when the individual has provided suitable identification (photographic e.g. passport, driving license or other suitable ID). All requests will be securely stored for 5 years unless the request for erasure is requested.

## **10. Data Breaches**

**10.1** Red Dragon First Aid have systems and controls in place to prevent data breaches, however in such an event where an individual's data has been lost, stolen or has been accessed by unauthorised parties Red Dragon First Aid will notify the Information Commissioners Office (ICO) within 72hrs of the breach.

**10.2** The following individual is the point of contact when a data breach has been identified:

a) Data Breach Response Coordinator is – Denis Mills

**10.3** Red Dragon First Aid's data breach process is described below:

a) Serious data breach identified, and Data Breach Response Coordinator is informed.

b) The type of event is identified as lost, stolen or subject to unauthorized access.

c) The coordinator informs the Information Commissioners Office (ICO).

d) The coordinator instigates an investigation, identifies the source of the breach and puts in places measures to reduce risk and impact

e) The coordinator informs all individuals concerned

f) Red Dragon First Aid monitor for further breaches

## **11. Making a Complaint**

**11.1** If individuals are dissatisfied with Red Dragon First Aid's Data Protection and Privacy Policy or its implementation please see Red Dragon First Aid's Complaints Policy.

## 12. Red Dragon First Aid Privacy Notice for Learners

### 12.1 Notice

- a) Red Dragon First Aid collects, retains and passes on the following data to ITC First: Name, Date of Birth, Address, Email Address, Telephone Number, Ethnicity, National Identity, Signature data in order to produce qualification certificates and monitor the data to ensure we meet our equality and diversity and access to learning obligations.
- b) Failure to provide your data can result in your qualification certificate not being issued.
- c) Your data may be passed, securely on to the UK Government who will utilise it for statistical purposes.
- d) Your personal data will only be accessible to Awarding organisation (ITC First), the course provider (Red Dragon First Aid) and legitimate professionals (need-to-know basis) and will not be passed to any other external third party.
- e) Your data will be held for 5 years from the date of your certificate after which point it is destroyed or anonymised.
- f) Individuals have rights associated with personal data which can be found on the [ICO website](#).
- g) You may withdraw your consent for Red Dragon First Aid to securely store your data at any time within the 5 year period.

## **Appendix 1**

### **Red Dragon First Aid's Privacy Notice**

Red Dragon First Aid is committed to the fair and transparent processing of personal data and data security. This data protection/privacy policy sets out how we will manage the personal data, which you provide to us in compliance with the General Data Protection Regulation (EU) 2016/679 (**GDPR**).

This policy contains important information about who we are, how and why we collect, store, use and share personal data and your rights in relation to your personal data.

**Red Dragon First Aid** is our trading name. Our address is Red Dragon First Aid, 146 Claremont, Malpas, Newport, Gwent, NP20 6PP.

For the purposes of the GDPR, Red Dragon First Aid is the 'controller' of the personal data you provide to us.

If you have any queries about this Policy, the way in which Red Dragon First Aid processes personal data, or about exercising any of your rights, please send an email to [reddragonfirstaid@btinternet.com](mailto:reddragonfirstaid@btinternet.com) or write to Director, Red Dragon First Aid, 146 Claremont, Malpas, Newport, Gwent, NP20 6PP.

### **Personal data we collect**

We may collect and process the following personal data:

**Information provided to us**, When you:

- Complete a form on our Website
- Book on a course
- Contact us by phone, e-mail, or in writing
- Report a problem
  
- Sign up to our newsletter.

We may collect your name, e-mail address, postal address and telephone number.

### **Information we collect about you**

If you visit our Website, [www.red-dragon-first-aid.co.uk](http://www.red-dragon-first-aid.co.uk), we may automatically collect the following information:

- Technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

### **Information we receive from other sources**

If you are a tutor, assessor, or learner, we may also receive information about you from your centre, training provider, or employer when they register to receive products and/or services from us.

### **Information about other individuals**

If you provide information to us about any person other than yourself, such as employees or your suppliers, you must ensure that they have given their permission for you to disclose it to us, they understand how their information will be used, and for you to allow us to use it.

### **Sensitive personal information**

In certain limited cases, we may collect certain sensitive personal data from you (e.g. information about your racial or ethnic origin and physical or mental health). We will only do this on the basis of your consent.

### **How Red Dragon First Aid uses your personal data**

#### **Legitimate interests**

Where this is necessary for purposes, which are in our, or our Awarding Organisation (ITC First) legitimate interests. These interests are:

- Providing you with newsletters, surveys, information about our qualifications and events related to products and services offered by Red Dragon First Aid which may be of interest to you
- Communicating with you in relation to any problems, complaints, or disputes
- Improving the quality of experience when you interact with us and our products and/or services

**NOTE:** All individuals have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

#### **Contract performance**

We may use your personal data to fulfil a contract, or take steps linked to a contract:

- To provide the products and/or services to you i.e. qualifications
- To communicate with you in relation to the provision of the contracted products and services
- To provide you with admin support such as account creation, security, and responding to issues
- Provide you with industry or sector information, surveys, information about our qualifications and events, related to the products and/or services.

#### **Consent**

Where you have given your express consent to receive marketing communications, we may use your personal data to send you newsletters, surveys, information about our awards and events related to products and services offered by Red Dragon First Aid which may be of interest to you,

**Where required by law:** We may also process your personal data if required to by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

#### **Who do we share your personal data with?**

We take all practical steps to ensure that Red Dragon First Aid staff protect your personal data and that they are aware of their information security obligations. Access to your personal data is limited to those who have a genuine operational need to know it.

We may also share your personal data with legitimate professionals outside Red Dragon First Aid including:



- Legal and other professional advisers, consultants, and professional experts
- Service providers contracted to us in connection with provision of the products and services such as providers of IT services, Website services
- Law enforcement or other authorities if required by law.
- ITC First (Awarding Organisation)

### How long does Red Dragon First Aid keep your personal data?

Where there is an agreement between us, we will retain your personal data for the duration of the agreement, and for a period of five years following its termination or expiry, to ensure we are able to comply with any legal, audit and other regulatory requirements, or any orders from courts or competent authorities.

Where you give consent to marketing communications, you can change your preferences or unsubscribe at any time by clicking the unsubscribe link in an email from us.

### Where we store your personal data and how we protect it

We take appropriate steps to protect your personal data from loss or destruction. We also have a procedure in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the Internet is not completely secure. However we will always strive to protect your personal data. We cannot guarantee the security of your personal data transmitted to our Website; any transmission is at the your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

### Your rights

Under the GDPR, you have rights with respect to our use of your personal data:

The Right to:	
<b>Access</b>	You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. All requests must be accompanied by information, which allows us to verify your identity (ID). We will respond to your request within one calendar month. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing information, or if your request is excessive.
<b>Rectification</b>	We strive to keep your personal data accurate and complete. Please contact us using the contact details provided to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.
<b>Erasure</b>	You have the right to request the deletion of your personal data. Instances of erasure may include, personal data no longer necessary for the purposes for which they were collected, where your consent to processing is withdrawn, where there is no legitimate interest for us to continue to process your personal data, or your personal data has been processed unlawfully.
<b>Object</b>	In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.
<b>Restrict</b>	In certain circumstances, you have the right to request that we restrict the processing of

<b>processing</b>	your personal data. This right arises where, for example, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted.
<b>Data portability</b>	In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine- readable (electronic) format.

For any request associated with the rights described above, please contact Red Dragon First Aid using the details below.

**NOTE: GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.**

### Contact us

If you have any queries about this Policy, the way in which Red Dragon First Aid processes personal data, or about exercising any of your rights, please send an email to [reddragonfirstaid@btinternet.com](mailto:reddragonfirstaid@btinternet.com) or write to, Director, Red Dragon First Aid, 146 Claremont, Malpas, Newport, Gwent, NP20 6PP.

### Complaints

If you believe that your data protection rights may have been breached, please first contact ITC First using the details above, however if we have been unable to resolve your concern, you may submit a complaint to the Information Commissioners Office. Please visit <https://ico.org.uk/concerns/> for more information.

### Associated Documents

#### Changes to Policy

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, any individuals concerned will be notified by e-mail.

**Appendix 2**

Please print clearly or electronically as unclear/illegible applications may be returned to the applicant. Please complete all requested details below:

**Section 1**

	<b>Request</b>	<b>✓</b>
a.	Please provide me with a list of the personal data ITC holds for me	
b.	Please correct my details on ITC's system	
c.	Please delete my personal data from your system	
d.	Please provide my personal data in a spreadsheet	

**Section 2** Please provide us with your details to allow us to find you on the system and enable us to respond to your request promptly

<b>e. Your Name</b>	
<b>f. Date of Birth</b>	
<b>g. Address</b>	
<b>h. Post Code</b>	
<b>i. Email Address</b>	

**Section 3** Please tell us how you would like to verify your identification. You may forward a photocopy or scan of your identification document/s.

<b>j. Passport</b>	
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<b>k. Driving License</b>	
<b>l. Other (please state)</b>	

**Data Processing Notice**

Red Dragon First Aid collect and process your personal data in order for ITC First (our Awarding Organisation) can produce qualification certificates and monitor the data to ensure we meet our equality and diversity and access to learning obligations. Failure to provide your data can result in your qualification certificate not being issued. Your personal data will not be passed to any other external third party other than ITC First. Your data will be held for 5 years from the date on your certificate after which point, your data is destroyed or anonymised. You have rights associated with personal data which can be found on the [ICO website](#). You may withdraw your consent for Red Dragon First Aid to securely store your data at any time within the 5 year period. If this request is for erasure of your data then this request will be destroyed upon confirmation of the erasure.

**Please sign to indicate you understand the information above**

<b>Signature</b>		<b>Date</b>	
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