



## Privacy Notice – Tkm Training Courses

### Introduction

As you would expect, Tkm always endeavours to follow best practice with regards to the way in which personal data is processed. We will not collect personal information unless it is specifically required for the purposes for which we need to process it.

This privacy notice deals specifically with personal data that is processed for the purposes of administering training courses and qualifications. The majority of training run by Tkm is accredited or approved by a recognised UK awarding body who have specific requirements with regard to how personal data is processed to ensure the quality and integrity of awards or qualifications are maintained. It should also be noted that any personal information passed to awarding bodies is processed for their own purposes. They do not process personal information on behalf of Tkm.

### What Information is Collected and How is it Used?

The table below summarises the personal information Tkm collects, the purpose for which it is collected, and recipients of information. Tkm usually collects some personal information at the time training to allow the joining information to be issued, which will be verified using a registration form on the first day of any training. Tkm does not require you to provide anything marked as optional.

Information	Reason it is Required	Passed To (Recipients):
Personal contact details including name, home address, best contact telephone number.	Course administration, certificating results with an awarding body (not telephone number), to provide badges of achievement on successful completion of training.	Where you book your course through a booking agent information will be collected on Tkm's behalf, with some of the other information below.  Details are passed to the Scottish Qualifications Authority (SQA) with the exception of phone number.  Name and home address to certificate successful candidates. Information transferred to the SQA will also be used to make entries, certificate successful candidates and maintain a record of achievement.  <a href="http://www.sqa.org.uk/sqa/36588.html">www.sqa.org.uk/sqa/36588.html</a> .  This information is also passed to BCS where you are completing a BCS qualification.
E-mail address	Course administration and all personal correspondence. Tkm usually sends all personal	This is likely to be collected by any booking agent, see above.



Information	Reason it is Required	Passed To (Recipients):
	<p>correspondence, such as results, by e-mail although is happy to agree alternative methods with candidates, if required.</p> <p>We may also use this to send you promotional information that you have specifically requested.</p>	<p>For on-line courses, your e-mail and name will be added to the on-line platform, which is usually Webex. Their privacy notice is available <a href="#">here</a>.</p> <p>For those participating in a course with a badge of achievement and who would like to receive a badge, your name, e-mail and country will be provided to Acclaim. Their privacy notice is available <a href="#">here</a>. This is out with the EEA and uses standard contractual clauses.</p>
Workplace and current role (optional)	To adapt course content and ensure it caters for all attendees.	This may be collected by any booking agent, see above.
Type of ID and date of birth	Tkm will record which ID was presented and date of birth, which are required by the awarding body to certificate results. Tkm does not keep copies of ID.	Date of birth passed to the awarding bodies to certificate successful candidates.
Payment information	<p>Payment details, such as card number, are not recorded or retained by Tkm. Tkm uses PayPal to process payments and does not collect or retain payment information for their own purposes, other than confirmation of the transaction.</p> <p>You may also use a bank transfer, in which case Tkm's bank will process whatever information you provide to them as part of the transaction.</p>	<p>Tkm uses PayPal to process payments. Paypal's privacy policy is available <a href="#">here</a>.</p> <p>A booking agent may process payment on our behalf, see above.</p>
Information about reasonable adjustments (optional although we would much rather you told us so that we can do whatever we can to assist)	To ensure candidates are given equality of opportunity to achieve the qualification and comply with relevant legislation.	It is unlikely that this information will be passed to any third party although you will be informed if it is necessary to do so, for example, if it is necessary to specifically identify you to the hosting venue.
Dietary requirements (optional although we would much rather you told us so that we	Course administration	Numbers requiring special dietary requirements may be



Information	Reason it is Required	Passed To (Recipients):
can do whatever we can to assist)		passed to the venue providing facilities.
Exam scripts and assignments	<p>For candidates to demonstrate they have met the necessary standards set by the qualification and the awarding body. Completed assessment material must be retained for quality assurance purposes (including internal and external verification) and, in some circumstances, audit by the awarding body.</p> <p>Please note: for on-line courses this may include a recorded interview or invigilation. This will usually be recorded using Microsoft Teams and will be considered to be part of the exam script.</p>	These will only be passed to a third party for quality assurance purposes and awarding bodies. These are documented by Tkm policies – should you wish to see these policies, please contact us.
Appeals and complaints	To comply with awarding body policies	In cases where the complaint or appeal is escalated, the relevant information will be passed to the SQA or other awarding body, as required.
Feedback (optional)	<p>To contribute towards our commitment towards continuous improvement.</p> <p>We will <b>never</b> use feedback attributed to an individual without asking for your consent.</p>	N/A

Tkm sometimes works in collaboration with other organisations and may offer a discount on course fees for those that qualify. Where a discount is applied to a course booking and it is subject to someone being a member of an organisation, checks will be made that you are a current member of the relevant organisation. We will usually do this using surname and membership number.

Some of the technology used by Tkm, is managed by third parties. Tkm uses a data processor to provide data storage and another data processor to provide backup services.

Some of the technology used by Tkm is managed by third parties. While apps and technology are carefully selected, Tkm has little control over changes owners of the software may make to the way in which data is collected or what that data is subsequently used for. Where this is the case, Tkm will always identify the third party, and try to highlight what data is being collected, when and how, and provide links to their privacy information.



### ***The Legal Basis for Processing***

Those attending the training will normally be entering into a contract with Tkm for the provision of training services, whether they are self-funding or another party (such as an employer) is funding their training. The majority of information collected above is processed as it is necessary for the performance of a contract.

Where Tkm enters into a contract with an employer to deliver training in house, there may still be a contract in place with those attending. Where there isn't, personal data will be processed under legitimate interests. This is because Tkm is contractually required to deliver the service requested and required by awarding bodies to process the information to provide people with the certificates of qualification that they are expecting. Delivery of the qualification is also in the employer's legitimate interests as well as those attending. If those attending do not want their personal information processed in this way, they cannot be awarded the qualification.

Exceptions to the above are:

- i. Consent. This is used to send out any promotional or marketing material and use any feedback for Tkm's promotional purposes. You may also be asked to give consent for the processing of any special category information that is provided under information for reasonable adjustments or specific dietary requirements, such as a medical condition. Consent may also be requested for the transmission of your information to countries out with the EEA;
- ii. A limited amount of personal information may be retained alongside payment transactions, which Tkm has a legal obligation to report to the HMRC.

### ***Will My Information be Transferred Internationally?***

Tkm does not transfer your information internationally although some of those providing services on our behalf may do so. Where we know this to be the case, it is highlighted in the table above. We have provided links to the relevant privacy information.

### ***What Happens to My Information When it is No Longer Required?***

Information is securely destroyed when it is no longer required. Information relating to attendance at training courses is retained as stated below:

- i. Information relating to entering into a contract is retained for 5 years from the conclusion of the contract. This is usually the date those attending course complete their final assessment. For an in house course, it is likely to be from the date of final payment. This is related to legal obligations. The majority of personal information about those attending will be retained for this length of time, regardless of whether it is processed for the performance of a contract or legitimate interests. Information with a different retention period is detailed below;
- ii. Financial transaction information is retained for 6 years from the end of the financial year in which the payment was made. This is a legal requirement;



- iii. Information relating to dietary requirements and any other requests will usually be destroyed 3 months after completion of the training;
- iv. Information about reasonable adjustments is usually retained for 3 months from the date of final assessment although it should be noted that some of the awarding bodies have specific requirements about retaining this information for audit purposes. Consequently, this information will be retained for longer where required by the awarding body. If you have any specific requirements about your own personal information please get in touch and we will be able to confirm what happens in your case;
- v. Exam scripts and assessments are usually retained for 1 year from the date of final assessment. Some assessments will be retained for longer where they are subject to quality assurance procedures, or in the event of an outstanding complaint or appeal.

### **Your Rights**

Under the GDPR, you have a number of rights in relation to your personal information. You have the right to:

- i. request access to your personal information;
- ii. request rectification of your personal information which means you are able to have inaccurate personal information corrected without undue delay;
- ii. request erasure of your personal information when certain conditions apply;
- iii. restrict processing under certain circumstances;
- iv. object to processing;
- v. data portability in some circumstances.

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information. Details of recipients can be found above.

There may be occasions when Tkm is unable to comply with requests to exercise the rights above. Should this apply to a request you make, it will be explained to you why Tkm is unable to comply with the request and any options available to you.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time. You should be aware that, while Tkm will stop using your information for that purpose with immediate effect, it may not always be possible to remove information from the public domain, for example where it has been used in hard copy promotional materials. You may withdraw your consent at any time for allowing your information to be used for marketing purposes.

### **Complaints**

Should you be unhappy with the way in which Tkm have processed your personal data, we would like you to contact us first. We will always endeavour to resolve any issues wherever we can. You have the right to lodge a complaint with the Information Commissioner, who regulates data protection legislation across the UK. Their contact details can be found at <https://ico.org.uk/>.



tkmconsulting.co.uk  
e. [liz@tkmconsulting.co.uk](mailto:liz@tkmconsulting.co.uk)  
t. 01599 511277

### **Contact Details**

Tkm Consulting (Craigellachie) Limited is the data controller (or controller) for all personal information processed for administering training courses.

Liz Taylor is responsible for data protection matters and you can use any of the contact details at the top of each page to contact her.