

1. Introduction

The International Fire Training Centre ("**IFTC**", "**we**" or "**us**") takes its data protection and privacy responsibilities seriously.

We have developed this IFTC Privacy Policy to ensure those who access and/or use our services are informed and confident about the security and privacy of their personal information.

Please read this IFTC Privacy Policy carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so you are informed about how and why we collect, store, use and share your personal information. This IFTC Privacy Policy also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

When we handle certain personal data about you, we do so subject to applicable data protection laws, including the General Data Protection Regulation ((EU) 2016/679) and the Data Protection Act 2018. This IFTC Privacy Policy supplements our terms and conditions and is not intended to override them.

Our website may provide links to third party websites. We are not responsible for the conduct of third party companies linked to the website and you should refer to the privacy notices of these third parties about how they may handle your personal information.

2. About Us.

IFTC is owned and operated by Serco Limited (00242246) with registered office at Serco House, 16 Bartley Wood Business Park, Bartley Way Hook, and Hampshire, RG27 9UY.

Serco Limited is the 'controller' of your personal data, responsible for deciding how and why your personal data is gathered and used.

3. How Your Personal Data Is Collected

When using the term "personal data" or "personal information" in this IFTC Privacy Policy, we mean information (including opinions) that relates to you and from which you could be identified, either directly or in combination with other information which we may have in our possession.

The circumstances by which we may collect personal data about you includes when:

- the personal data is provided to us by you (e.g. when you contact us by email or telephone, when you enter a competition, fill in a survey);
- the personal data is collected in the normal course of our relationship with you (e.g. when booking on a course with us);
- the personal data has been made public by you (e.g. contacting IFTC via a social media platform) or obtained from a publicly accessible source (e.g. Companies House, public telephone directories);
- the personal data is received from your employer or other party that booked you on a course;
- the personal data is received by us from third parties (e.g. law enforcement authorities, partner organisations);
- the personal data is received from trusted suppliers (e.g. payment providers, marketing agencies);
- the personal data is collected via our IT systems, including via our online learning repository or our website.
- the personal data is created by us, such as records of your communications with IFTC.

4. Cookies

We use cookies on our website. Cookies are small text files that are downloaded onto your device when you visit a website. Please refer to our [cookies policy](#) for further information about our use of cookies.

5. Personal Data Collected

The categories of personal information about you which we may collect and use includes:

- **Personal details:** title, full name, business or home address, telephone numbers, email address, nationality, language/dialect spoken, job role, vehicle details, travel assistance requirements, passport details, signature.
- **Employment and Business Details:** industry, job role, business activities, employer, work contact details.

- **Family and Friends Information:** family and dependents, emergency contact details.
- **Public Identifiers:** social media handles, photographs, video recordings (identifying physical characteristics).
- **Financial Details:** purchase transaction history, bank or credit card information.
- **Travel Information:** travel and accommodation itinerary information.
- **Communications:** social media postings, responses, comments, feedback and opinions when you communicate to us with us for instance when making a complaint.
- **Training Records:** information about your training, including records of performance, results and any training work product submitted by you.
- **Preferences:** consents, permissions, or preferences that you have specified, such as whether you wish to subscribe to our mailing list or agree to our terms and conditions.
- **Incident History:** health and safety accidents, security incidents, accident information, complaints communications, insurance claims history.
- **Special Category Personal Data:** health and medical information, racial or ethnic origin, religion.
- **Website and Other Online Access Details:** your computers unique identifier (e.g. IP Address), the date and time you accessed the Website, passwords.

6. How And Why We Use Your Personal Information

Data protection and privacy laws requires us to have a “legal basis” or “lawful ground” to collect and handle your personal information. We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this.

The purposes for which we may use your personal data and the legal bases on which we may perform such processing are set out below:

Where necessary to the performance of a contract with you, or take steps linked to a contract:

- to deliver the contracted training programme including recording the details of your academic studies, providing assessment and determine your performance;
- To exercise our legal rights with respect to our contract with you.

Where you give us consent:

- On occasions we may ask you for your consent to process your information, we will use the data for the purpose which we explain at the time.

For purposes which are required by law:

- In response to requests from government law enforcement authorities conducting an investigation.
- Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business e.g. in the framework of tax control and reporting obligations.

Where necessary for Serco’s legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:

- To manage and deliver the requested training and associated services to you, including the operation of our website.
- To manage our relationship with you including any enquiries, complaints and feedback;
- To enhance, modify, personalise or otherwise improve our services / communications for the benefit of our clients;
- For security purposes, including managing access to learning materials, authenticating your identity and recording visits to our business premises;
- For promotional purposes;
- For accounting, auditing and risk management purposes;
- To support business, operational and administrative functions;
- For health and safety purposes;
- For quality assurance and staff and supplier training purposes;
- To monitor compliance with internal business policies and the quality of our service delivery;
- For business management and analysis purposes, to continually evaluate, develop and improve our products and services as well as the experiences of customers and users of our services in order to provide an efficient and high-quality service;
- To develop business strategies;

- To prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable law;
- To manage the security of our networks and property and ensure appropriate use, including monitoring access to our web platform and IT systems;
- In connection with a business transaction such as merger, restructuring or sale of the business; or
- We will use personal information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We have carried out balancing tests (also known as legitimate interest assessments) for the data processing we carry out based on our or a third party's legitimate interest.

Where we need to use your personal information for any other purpose, we will let you know at the time we collect your personal information or as required or permitted by law.

Serco sometimes handles personal information relying on exemptions under the applicable data protection law. Any permitted handling of personal information under such exemptions will take priority over this IFTC Privacy Policy to the extent of any inconsistency.

7. When Is Special Category Personal Data Collected And Used?

Special category information is certain kinds of personal data that is particularly sensitive and requires higher levels of protection. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers and trade union membership.

We will primarily collect special category information in the following scenarios:

- ask you about health concerns, dietary requirements or disabilities when purchasing our services so that we can ensure that what we deliver is both suitable and tailored to you.
- If there is an accident on site, we will record the details which may include medical information.
- you may choose to share special category information in your communications with us.

We need to have further justification for collecting, storing and using this type of personal information. Where required by applicable laws, we will take steps to have in place an appropriate policy document and safeguards relating to the processing of such personal information.

Where we do collect and handle special category personal information, we will only handle that information in accordance with applicable law, including where:

- we have your explicit consent (which can be withdrawn at any time);
- processing is necessary for the establishment, exercise or defence of legal claims; or
- processing is necessary for reasons of substantial public interest such as preventing and detecting unlawful acts of fraud.

We will consider that you have given us your consent to hold your special category data where you have voluntarily provided such information in your communications with us or provided information we have marked as optional but for the avoidance of doubt, Serco will only use the information for the purpose for which it was received unless otherwise required by applicable law.

Less commonly, we may process this type of information where it is needed to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where you have already made the information public.

8. Sharing Your Personal Information With Others

We will only disclose personal information to a third party in very limited circumstances, or where we are permitted to do so by law. The third parties we provide your personal data to includes:

- your employer;
- other organisations within the Serco group of companies, where such disclosure is necessary to provide you with our services or to manage our business;
- Durham Tees Valley Airport as IFTC is required to share the personal information of students attending a course at this live airfield (i.e.. full name and either their driving licence number or passport number);
- third parties we use to help deliver our products and services to you, (e.g. banks and payment providers);
- third parties contracted to deliver training and services on behalf of IFTC;

- other third parties we use to help us run our business, (e.g. marketing agencies, IT support service providers, analysis experts, communication platform providers);
- third parties approved by you e.g. when you request your details to be transferred;
- our professional advisers (e.g. law firms, insurers and brokers); and/or
- Government, regulatory and law enforcement bodies where we are required in order:
 - a) to comply with our legal obligations;
 - b) to exercise our legal rights (e.g. pursue or defend a claim); and
 - c) for the prevention, detection and investigation of crime.

We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets, or in the event there is an operational or management change of IFTC.

We impose data protection obligations on contracted third parties to ensure they can only use your personal data to provide services to IFTC contracted services. These third parties cannot pass your details onto any other parties unless instructed to by IFTC.

9. Transferring Your Personal Information Globally

The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") (for example, Israel or the USA). It may also be processed by workers operating outside the EEA who work for us or for one of our service providers. We may also send information about you to your employer who is based outside the EEA, such as course reports.

We will take appropriate steps to ensure that transfers of personal data are in accordance with applicable law and carefully managed to protect your privacy rights and interests. To achieve this, transfers are limited to countries which are recognised as providing an adequate level of legal protection or where we are satisfied that alternative arrangements are in place to protect your privacy rights. To this end, we will:

- in the limited circumstances that information is transferred within Serco Group, ensure such transfers are covered by an intra-group data sharing agreement entered into by all relevant entities within Serco Group, which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection.
- when transferring personal data to third parties outside the EEA:
 - put in place binding corporate agreements, which will include the standard contractual clauses approved by the European Commission for transferring personal information outside the EEA, to ensure that your information is safeguarded; or
 - ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission or the company is registered and compliant with a European Commission approved privacy shield scheme.
- carefully validate any requests for information from law enforcement or regulators before disclosing the information.

We will co-operate with any regulators as required by law to ensure that we remain transparent about the way we handle your personal information.

If you would like further information about the handling of your personal information, please contact us at roleaccount@iftc.co.uk

10. Security of Your Personal Information

We take precautions including administrative, technical and physical measures to safeguard your personal information against loss, theft and misuse, as well as against unauthorised access, modification, disclosure, alteration and destruction. We protect your personal information using a variety of security measures including:

- password access;
- data back-up;
- encryption;
- firewalls;
- placing confidentiality requirements on employees and service providers;
- providing training to our employees to ensure that your personal data is handled correctly;

- destroying or permanently anonymising personal information if it is no longer needed for the purposes it was collected in accordance with our retention policies; and
- secure physical storage units for hard copy files with appropriate security restrictions, preventing damage, and unauthorised access to your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we have in place robust procedures and security features to try to prevent unauthorised access.

11. How Long Do We Keep Your Personal Information?

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this Privacy Policy, including where we maintain an ongoing business relationship with you.

IFTC will generally retain your personal data in accordance with any applicable limitation period (as set out in applicable law) plus one (1) year, to allow reasonable time for review and deletion/anonymisation of the personal information held. This will usually be seven (7) years following the expiry of our business or participant relationship with you.

In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements or to have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings. When no longer necessary to retain your personal information, we will delete or anonymise it.

12. Your Legal Rights In Respect of Your Personal Information

You have legal rights in connection with personal information. Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (commonly known as the "right to be forgotten"). This enables you to ask us to delete or remove personal information in limited circumstances, where: (i) it is no longer needed for the purposes for which it was collected; (ii) you have withdrawn your consent (where the data processing was based on consent); (iii) following a successful right to object (see [Object to processing](#)); (iv) it has been processed unlawfully; or (v) to comply with a legal obligation to which the IFTC is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for a few reasons, including: (i) for compliance with a legal obligation; or (ii) for the establishment, exercise or defence of legal claims.

- **Object to processing** of your personal information by us or on our behalf which has our legitimate interests as its legal basis for that processing, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. You can object at any time to your personal information being processed for direct marketing (including profiling).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, but only where: (i) its accuracy is contested, to allow us to verify its accuracy; (ii) the processing is unlawful, but you do not want it erased; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or (iv) you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where: (i) we have your consent; (ii) to establish, exercise or defend legal claims; or (iii) to protect the rights of another natural or legal person.

- **Request the transfer** of your personal information. You can ask us to provide your personal information to

you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where: (i) the processing is based on your consent or on the performance of a contract with you; and (ii) the processing is carried out by automated means.

- **Obtain a copy, or reference to, the personal data safeguards used for transfers outside the European Union.** We may redact data transfer agreements to protect commercial terms.
- **Withdraw consent** to processing where the legal basis for processing is solely justified on the grounds of consent. Please note, to ensure security of personal information, we may ask you to verify your identity before proceeding with any such request.

If you would like to exercise any of these rights, please submit your requests to:

Data Protection Champion,
The International Fire Training Centre
Technology House,
Durham Tees Valley Airport,
Darlington, Co. Durham
DL2 1NU.

Email: roleaccount@iftc.co.uk

Telephone: 01325 333317

Please note, to ensure security of personal information, we may ask you to verify your identity before proceeding with any such request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

13. Data Protection Contacts

Serco Limited has appointed a Data Protection Officer (**DPO**) to oversee its compliance with this IFTC Privacy Policy. If you have any questions about this IFTC Privacy Policy or how we handle your personal information, please address to:

Data Protection Officer
Serco Ltd
Enterprise House
18 Bartley Wood Business Park
Bartley Way
RG27 9XB

Alternatively, please email dpo@serco.com or call +44 (0)1256 745900.

Information Commissioner's Office

We ask that you please attempt to resolve any issues with us first by contacting the DPO, however you have a right to contact the Information Commissioner's Office any time and lodge a complaint (<https://ico.org.uk/concerns/> or telephone: 0303 123 1113). The Information Commissioner's Office will then investigate your complaint accordingly.

14. Changes To This IFTC Privacy Policy

This IFTC Privacy Policy was last reviewed and updated in May 2019. We may amend this IFTC Privacy Policy from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check this page for the latest version of this IFTC Privacy Policy.