



## SNAP Cymru Training – Privacy and Data Protection Policy

This Privacy and Data Protection policy explains how we use any personal information we collect about you when you participate in SNAP Cymru Training service. SNAP Cymru is compliant with The Data Protection Act 2018 which controls how your personal information is used. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

When we handle your personal information we comply with the law.

### **Our commitment**

When we ask you for your personal information we will:

- Explain why we need it
- Only ask for what we need
- Treat it confidentially

**When we record your information we will:**

- Only share what is necessary and relevant with consent
- Ensure all our staff who handle personal information are given training

### **What information do we collect about you?**

All learners registered with AGORED Cymru for accredited courses will have provided personal information such as name, address, age, employment status, disability status, ethnicity etc. Additional information may have been provided to evidence a request for special arrangements or consideration. What may not be included is information, data or other material that cannot legitimately be shown to be related directly or indirectly to the registration of the learner concerned.

### **Giving consent**

To comply with the Law we must ask for your consent to record, use, or store your Personal and sensitive data. If you give consent you are saying that we can record and use your personal Data for accreditation and review purposes We will keep a record of how and when you gave consent. You can withdraw your consent at any time and the data will be removed.

### **How will we use the information about you?**

We collect information about you in order to process your accreditation, and, if you agree; to correspond with you; to provide information about services we think may be of interest to you.

- We will use your anonymised information (no personal details) for reporting and evaluation.
- We may seek your views or comments on the services we provide or notify you of changes to our services.
- We may send you communications which you have requested. These may include information leaflets and guides.

### **How long do we keep your information?**

- All Learners' Assessment records, Moderation and IV documents including records of registrations and certificates rewarded are kept in

compliance with AGORED Cymru requirements. All SNAP Cymru data is stored securely for 7 years.

- Our data storage is accredited to ISO27001 standard and with EU Safe Harbour certification. We are working towards compliance with Cyber Essentials
- Nightly backup of data & service, scheduled copies & further cycled set of encrypted data disks (stored off-site)
- Your information is removed and securely disposed of after 7 years.
- We review our retention periods for personal information on a regular basis and meet standard recommendations and best practice in confidential waste destruction

### **Sharing information with third parties**

- The use and sharing of personal information forms an essential part of an accreditation process. We will ask for your consent to share your data when required for this purpose.
- We will not share your personal and sensitive information for any purpose with organisations outside the SNAP Cymru and AGORED Cymru without your explicit consent.
- Your consent to share data is specific to the organisation that data is being shared with. It is not a general 'consent to share with third parties'. We will ask you and record the consent details on your file. For information on AGORED Cymru's Learner Privacy Statement please go to >

<http://www.agored.cymru/Learners/Privacy-Statement>

The only exception to this would be if a safeguarding referral needed to be made or we are required by law to do so.

### **Can I have access to my information and make correction?**

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us, email or write to us at the following address  
[training@snapcymru.com](mailto:training@snapcymru.com)

We will meet your request as quickly as possible and generally always within

one month of the request. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

### **The ‘right to be forgotten’**

- If you’ve changed your mind, you can ask to have your information removed or withdrawn.
- The law says withdrawal of consent should be as simple as giving it. If you withdraw your consent, or object to the way it is being processed we will remove your information from our system.
- Contact us at [amanda.daniels@snapcymru.com](mailto:amanda.daniels@snapcymru.com) or call 02920 348990

### **How to contact us**

Please contact us if you have any questions or concerns about the way we handle your privacy and data protection or information we hold about you: by email to:

[training@snapcymru.com](mailto:training@snapcymru.com) or our Centre Manager Amanda Daniels

[Amanda.daniels@snapcymru.org](mailto:Amanda.daniels@snapcymru.org)

You have a right to complain to the Information Commissioner’s Office – Wales (ICO) if you think there is a problem with the way we are handling your data

Telephone: 02920 678400, Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

Our aim is to achieve a continuous progression towards the standards of best practice that this policy prescribes. If you have concerns that you feel SNAP Cymru have not satisfied and would like to discuss with AGORED Cymru please see:

<http://www.agored.cymru/About-Us/Policies> or contact 02920 747866

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