

## Data Protection Policy

<b>Version</b>	1
<b>Title of Policy</b>	Data Protection
<b>Policy Owner</b>	Vicki Zolkiewicz
<b>Date of Authorisation</b>	29/01/2026
<b>Authorised by</b>	Kerry Bentley
<b>Date for Review</b>	29/01/2027

DBC Training is committed to compliance with the requirements of the Data Protection Act 2018 and The General Data Protection Regulation.

DBC Training will therefore follow procedures which aim to ensure that all employees, elected members, contractors, agents, consultants, partners or other servants of the company who have access to any personal data held by or on behalf of the company, are fully aware of and abide by their duties under the Data Protection Act 2018 and The General Data Protection Regulation.

### Statement of Policy

In order to operate efficiently, DBC Training has to collect and use information about people with whom it works. These may include members of the public, current, past and prospective employees, clients and customers, and suppliers. In addition, it may be required by law to collect and use information in order to comply with other statutory acts or funding body requirements.

The company has appointed Vicki Zolkiewicz as its Data Protection Officer. The role of the Data Protection Officer is to inform and advise DBC Training on its data protection obligations and to oversee compliance inline with the data protection policies and procedures. The Data Protection Officer can be contacted at [info@DBC-training.co.uk](mailto:info@DBC-training.co.uk). Any questions or concerns regarding GDPR should be directed to the DPO in the first instance.

There are two types of data that is stored, Personal and sensitive data and Processing data.

**Personal** data relates to someone who can be identified, directly or indirectly, by an 'identifier' such as their name, or an identification number. It also includes online data.

**Sensitive** personal data includes information about an individual's race, ethnicity, politics, religion or beliefs, trade union status, health, sex life, sexual orientation or crimes. It's legitimate to process 'sensitive personal data' where necessary to carry out an obligation under an employment contract or collective agreement.

Criminal records are also sensitive data. Employers can carry out criminal record checks for roles that involve working with children or vulnerable adults but not on a routine basis.

**Processing data** Processing data includes obtaining, holding, retrieving, consulting and using data by carrying out any operation on it. There are seven general key principles which apply:

- be processed fairly, lawfully and in a transparent manner.
- be collected for specific, explicit, and legitimate purposes.
- be adequate, relevant and limited to what is necessary for the purposes of processing.
- be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay.
- not be kept for longer than is necessary for its given purpose.
- be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- comply with the relevant GDPR procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- the right to be informed.
- the right of access.
- the right for any inaccuracies to be corrected.
- the right to have information deleted.
- the right to restrict the processing of the data.
- the right to portability.
- the right to object to the inclusion of any information.
- the right to regulate any automated decision-making and profiling of personal data.

Data subjects have individual rights including the right to be informed about the processing of personal data and to be forgotten by having data deleted where there's no compelling reason for it to be processed.

Personal data will not be transferred to a country or territory outside the EEA unless an adequate level of protection of the rights and freedoms of the data subject(s) can be guaranteed.

Individual rights as a data subject, individuals have a number of rights in relation to their personal data. They have the right to:

- access and obtain a copy of the personal data we hold about them on request (also known as a subject access request).
- require the company to correct inaccurate or incomplete personal data.
- require the company to delete or stop processing their personal data where there is no good reason for the company continuing to process it or where they have exercised their right to object to processing.
- object to the processing of their personal data where the company is relying on its legitimate interests (or those of a third party) as the legal ground for processing.
- request the restriction of processing of their personal data. This enables them to ask the company to suspend the processing of their personal data, for example if they want the company to establish its accuracy or the reason for processing it.

To ask DBC Training to take any of these steps, the individual should send the request to [info@dbc-training.co.uk](mailto:info@dbc-training.co.uk).

DBC Training regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between the company and those with whom it carries out business. The company will ensure that it treats personal information lawfully and correctly.

To this end DBC Training fully endorses and adheres to the principles of Data Protection as set out in the Data Protection Act 2018.