

PRIVACY NOTICE

IT IS THE RESPONSIBILITY OF ALL USERS OF THIS POLICY TO ENSURE THAT THE CORRECT VERSION IS BEING USED

This policy has been approved by the undersigned and will be reviewed on an annual basis. In case of any queries or questions in relation to this policy please contact the Chief Operating Officer (Sophie McCracken) or CEO (Jane Lambert)

Does this document meet the requirements of the Equality Act 2010 in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation?

Yes

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Author:	Clara Travers		
Position:	Director of Services		
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Author signature:	Clara Travers	Date:	Jan 2023
Approved by:	Sophie McCracken		
Position:	Chief Operating Officer		
Signature:	S.McCracken	Date:	Jan 2023

REVISION HISTORY

Date	Version No	Revised by	Reason for Update Sections Affected Description	Approved by	Date of next Review
January 2023	V3	Clara Travers	Annual review and re branding	Sophie McCracken	January 2024
January 2023	V4	Lorna Pratt	Annual review	Sophie McCracken	January 2025
February 2025	V5	Clara Travers	Annual review Updated categories of data. Updated font and font size. Added Telephone conversations.	Sophie McCracken	February 2026
February 2026	V5.1	Lorna Martin	Annual review Updated phone numbers	Sophie McCracken	February 2027

This Privacy Notice explains how ECG use any personal information we collect about you when you use our website, purchase/utilise any ECG products and services and communicate with ECG. This Notice covers the following areas:

1. Who is responsible for your data
2. Personal data we collect about you
 - a. Categories of data we collect
 - b. Sensitive personal data
3. How and why we use your personal data
4. Requesting access to your personal data
5. Sharing your personal data
6. Security of your personal data
7. Cookies
8. Updates to our Privacy Notice
9. How to contact us

1. Who is responsible for your data

Our Privacy Notice applies to the personal data that ECG collects and uses.

2. Personal data we collect about you

When using the term “personal data” in our Privacy Notice, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name, your contact details, company, information relating to your training/qualifications, products purchased or information on how you use our website or you interact with us.

We collect some data from you, for example when you order products/services, use our website, use our services or contact us. We may also receive your personal data from our clients (your booking organiser), who provide your details to ECG to facilitate your attendance or access to our training courses.

Categories of data we collect

We may collect and process the following information about you:

- Your name, surname and your contact details (email address, telephone number(s), postal address, Company)
- For some training courses your GPhC or registration number is required and for PGDs services the GPhC number and Pharmacists Superintendent name is also required
- Information about your transaction, including your payment card details
- When you purchase ECG products or services
- When you create an account for online courses
- When you register on our website
- When you register on our website using client specific portals, when you take part in our competitions, or when you choose an offer we make available on our website
- Information about your bookings, if you require special assistance or if you have specific dietary requirements
- Information about your health, if you have a medical condition that may affect your training (please see section “Sensitive personal data” below for more information)
- The communications you exchange with us (for example, your emails, letters or calls)
- When you contact ECG or you are contacted by ECG
- Your posts and messages on social media directed to ECG
- When you interact with us on social media
- Your feedback
- When you reply to our requests for feedback or participate in our customer surveys
- When you provide certificates to review with supporting documentation
- When you provide a C.V or application form **applicable for onboarding staff*
- When you provide a Passport / Driving License
- When you provide a DBS certificate
- When you provide registration details for a check to be completed
- When you provide an information for a DBS check to be completed
- When you provide occupational health details such as vaccination history

Sensitive personal data

In the course of providing services to you, we may collect information that could reveal your racial or ethnic origin, physical or mental health, religious beliefs or alleged commission or conviction of criminal offences. Such information is considered “sensitive personal data” under the General Data Protection Regulation. We only collect this information where you have given your explicit consent, it is necessary, or you have deliberately made it public.

For example, we may collect this information in the following circumstances:

- For your safety, when you have a specific medical condition which may impact on your ability to take part in the training course. You will need to inform us of that and – where required – provide us with a medical certificate.
- If you request special assistance for a training course, this could reveal information about your health. If you inform us about specific dietary requirements you may have, this could potentially indicate that you have specific religious beliefs.
- By providing any sensitive personal data you explicitly agree that we may collect and use it in order to provide our services and in accordance with this Privacy Notice. If you do not allow us to process any sensitive personal data, this may mean we are unable to provide all or parts of the services you have requested from us.

3. How and why we use your personal data

The data will be processed by ECG staff in accordance with the type of product or service required.

Data collected for other reasons detailed above will be only that which is required to meet the purpose and processed by the appropriate person within ECG. ECG will not share your information for marketing purposes with any companies outside ECG.

We use your personal data for the following purposes:

- Processing of orders for products and services
 - ECG requires personal data for contractual purposes to provide the product or service ordered.
 - Customers using PayPal to pay for products and services will be directed to their website and financial data collected by PayPal is subject to their Privacy Policy/Notice.
 - PGDs, a PGD is a legal document and defined information is required to enable these to be issued and accessed
- To deliver our training courses
 - Delegates need to be eligible to attend the training course and are asked to complete an attendance sheet prior to commencement of a face to face course.
 - Trainers will be supplied with advance details of delegates and check eligibility prior to commencement of training.
 - Attendance records are returned to ECG. They are required to ensure correct billing, provide data back to our clients/booking organiser and to provide evidence of delegate training.
- To communicate with you and manage our relationship with you
 - Occasionally we may need to contact you by email and/or SMS for administrative or operational reasons, for example in order to send you confirmation of your bookings and your payments, to inform you about changes to any training.
 - We will also use your personal data if we contact you after you have sent us an enquiry, filled in a web-form through our website or contacted us.
 - We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you as our customer and to improve our services and experiences for customers.
- To personalise and improve your customer experience
 - We may use your personal data in order to tailor our services.
 - We may also collect information on how you use our website, which pages of our website you visit most and what products/services you buy. We may use your

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The master document is held electronically at Emergency Care Gateway Ltd

This policy remains valid up until 6 months after the expiry date when it will become null and void.

information collected from the website to personalise your repeat visits to our website.

- The business purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, statistical and marketing analysis.
- To comply with our legal obligations.

4. Requesting access and correction to your data

You have a right to request access to the data that we hold about you. If you would like to request a copy of some or all of the data that ECG holds about you, please email bookings@ecgtraining.co.uk. You will then be sent a copy of our Subject Access Request Policy which sets out what we require to deal with your request.

5. Sharing your personal data

ECG will not share your information for marketing purposes with any other company.

We may share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- Suppliers providing services to us in order to help us run our business and improve our services. ECG will ensure these suppliers comply with high standards of security for the protection of your personal data.
- Clients purchasing our products and/or services on your behalf (booking organisers) e.g. your employer or place of work, LPC or alliance may provide your details to us to enable us to provide this product/service. We may be asked to provide these clients with confirmation of your attendance and successful completion of any training purchased.
- ECG approved trainers are required to ensure all delegates are eligible to participate in the courses
- If you make payment over the phone, these payments are processed by Worldpay. Your payment details are transmitted securely to Worldpay for verification and payment processing. Worldpay adheres to strict data protection regulations and uses advanced encryption to safeguard your information. For more details on how Worldpay handles your data, you can review their Privacy Notice.
- If you opt to pay on our website, these payments are processed by Stripe and your payment data is sent directly to Stripe. Stripe complies with leading security standards, including PCI-DSS (Payment Card Industry Data Security Standard), ensuring that your financial information is protected. More information about Stripe's data protection practices is available in their Privacy Policy.
- We do not store your full credit or debit card details on our systems. Instead, these details are securely handled by Stripe or Worldpay, depending on your payment method.
- We only share financial information necessary to process payments and issue refunds. These providers are contractually obligated to handle your data in compliance with applicable data protection laws and to never use your information for any purpose other than processing payments on our behalf.
- Non personal data may be shared with our partners for the purposes of, but not exclusively, business modelling and website tracking

- In addition to the parties listed above, we may disclose your personal data when this is required by the law of any jurisdiction to which ECG may be subject.
- Through our website we provide links to third party websites, when you link to other websites you should read their own privacy policies/ notices. Please be aware that this Privacy Notice does not apply to such websites and ECG is not responsible for your information that third parties may collect through these websites.

6. Security of your personal data

We are committed to taking appropriate measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to that personal data. When you provide your personal data through our website this information is transmitted across the internet securely using high-grade encryption.

As described in this Privacy Notice, there are some instances where we need to disclose your personal data to third parties. Where ECG discloses your personal data to a third party, we require that third party to have appropriate measures in place to protect your personal data; however in some instances we may be compelled by law to disclose your personal data to a third party and have limited control over how it is protected by that party.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party.

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Notice or in order to comply with the law.

Financial Information: We take the security of your payment information seriously and implement strict measures to ensure it is protected against unauthorised access, disclosure, or misuse. Our security practices for payment data include the following:

- **Encrypted Transactions:** All payment transactions made through our website or in-person systems are encrypted using **industry-standard SSL (Secure Socket Layer)** technology to protect your financial information during transmission.
- **Secure Payment Providers:** We use trusted third-party payment processors, such as **Worldpay** and **Stripe**, which comply with the **Payment Card Industry Data Security Standard (PCI-DSS)**. This ensures that your card information is handled securely and never stored in an unprotected format.
- **No Local Card Storage:** We do not store your full credit or debit card information on our systems. Instead, payments are processed directly by Worldpay or Stripe, and they handle the secure storage of card information as required by their security standards.
- **Access Control:** Access to payment-related records, such as billing information and receipts, is restricted to authorised personnel who require it to perform their duties (e.g., issuing refunds or resolving payment queries).

7. Telephone Conversations

We may record telephone conversations for quality assurance, training purposes, and to comply with regulatory requirements. When recording calls, we will always inform you at the start of the call that the conversation is being recorded and obtain your consent to do so, unless the recording is

necessary to fulfil a legal obligation or is in the legitimate interests of our business, in which case we will provide you with clear notice of this practice in our privacy policy.

We will cease recording when taking payment details.

8. Cookies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we use technologies, such as cookies. We will not be able to identify you from the information we collect using these technologies.

You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our website, most of the features will still be accessible without.

For more information on how we use cookies and how you can remove them, please read our Cookie Policy on the website.

9. Updates to our Privacy Notice

We review this Privacy Notice on a regular basis and will publish any new version on the website.

10. How to contact us

Please contact us if you have any questions about our Privacy Notice addressed to bookings@ecgtraining.co.uk

Tel: 01908 566474