**GDPR and John Viner, T/A Adept Education Associates – Privacy Statement**

**The data we hold**

**Clients**

By virtue of its business, Adept Education rarely holds any personal information relating to clients. However, some of the data we hold, such as details of a school, may result in individuals being identifiable. This data is never more than an individual’s:

* Name
* Address – usually this is the work (ie school) address
* eMail address – usually their business email, rarely but sometimes their personal

In the case of ITT Trainees, data held for the duration of their programme is likely to comprise, in addition to the above,

* DoB
* Home address
* Work history

Sometimes the data that is held may relate to the work-related performance of an individual.

**Co-workers**

From time to time the personal data of co-workers is held as part of working arrangements when the co-worker carries out work on behalf of Adept Education and is paid by them through an invoicing system. Adept Education is not an employer. Data held on co-workers may include:

* Name
* Address
* eMail address
* National Insurance number (rarely)
* VAT registration number, where applicable
* Bank account details for payment purposes.

**Data held by our bank**

We bank with HSBC and, in connection with the banking services they provide, they may collect such data as necessary for processing receipts and payments. This will rarely relate to an individual. Individuals wishing to find out more can look at the HSBC Privacy Notice at [www.business.hsbs.co.uk/legal](http://www.business.hsbs.co.uk/legal)

**Consent**

**Clients**

Personal information provided to Adept Education is always given voluntarily, as part of the information that a client wishes to make available in relation to work that has been commissioned from Adept Education. It is therefore entirely given with the consent of the client, who is responsible for the processing of data held on their staff. In the case of ~ITT candidates, information is passed on by eQualitas Ltd, in which case Adept Education is a data p[processor for this information.a

**Co-workers**

Personal information provided to Adept Education is always given in respect of that which is necessary for the commissioning of and payment for work undertaken on behalf of Adept Education.

**Fair Processing**

**Purpose**

Data will only be collected from individuals as part of Adept Education’s ability to fulfil contractual obligations to clients or commission work from and pay to co-workers and sub-contractors. It is never anticipated that any data processing will result in a high risk to individuals

**Sending personal data**

It is never usually necessary to send personal data to third parties beyond the commissioning client. In the case of a sub-contractor or co-worker, their professional details will be provided to clients within the requirements of any contract of business

**Retention of data**

Personal data that does not relate specifically to the fulfilment of a contract will be retained for a period of not more than ninety days after the completion of any contract or single piece of work. Thereafter it will be deleted and electronically shredded. Hard copy information will be shredded and destroyed.

Where the data relating to contracts with clients or co-workers, only the information necessary for processing payments in or out will be retained. Where there are references to personal information beyond that which is necessary for this purpose, it will be deleted from ongoing records. Finance records are retained for six years and then destroyed and securely disposed of.

**Right of data access**

Any individual who believes that Adept Education is holding their individual data (the data subject) has the right to:

* ask to access all of the data which we hold
* rectify inaccurate data
* restrict or object to the processing of their data for any purposes outside the core business of Adept Education (ie fulfilment of the contract with the client).
* export the data in a format that can be used in another UR environment (eg as a CSV file)
* insist that Adept Education completely erase all data on an individual and seek proof that this has been done.

**Data storage**

Personal data relating to clients and contractors is held in two locations.

* At the offices of Adept Education Associates
* At the office of the finance manager, who is externally contracted to provide accounting services.
* For a brief period each financial year, information about clients and payments are temporarily and securely held by our accountants, A J Welch, Canterbury.

Data held in hard copy is securely filed at 22 Byron Road, Maidstone, ME14 2HA and is disposed of according to the note above.

Data held electronically is protected by passwords which relate both to the devices on which the information is held and the Cloud accounts from which it is accessed. These passwords are never shared outside Adept Education Associates.

**Data Control and Processing**

* The GDPR applies to ‘controllers’ **and** ‘processors’.
* A controller determines the purposes and means of processing personal data.
* A processor is responsible for processing personal data on behalf of a controller.
* Data Processor is Clare Vine, self-employed book keeper. She is required to maintain records of personal data and processing activities. Our account are prepared by A Welch Accountants of Canterbury who, for the purposes of tax accounting are data processors. Data processors have legal liability if they are responsible for a breach.
* Data Controller is John Viner and is obliged to ensure all contracts with the processors comply with the GDPR.

**Data Protection Officer**

Since John Viner T/A Adept Education Associates is a sole-trader with very limited collection of personal data, we do not have a DPO.

