



**BUSINESS EDGE**  
AIR CONDITIONING & REFRIGERATION SPECIALISTS

## Privacy Policy – General Data Protection Regulation

### Who we are

Business Edge is a private limited company registered number 2458346. We are an approved Training Centre and training course provider for several examining bodies and supply products and consultancy services. At Business Edge we do all we can to respect your right to privacy and the protection of your personal information. This policy explains how Business Edge uses any personal information that we collect about you, how you can instruct us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy.

This notice sets out a summary of what we do with your information to run our business and provide our customers with products and services. Any changes we may make to our policy in the future will be updated on our website.

### The information we use and where we get it from

We collect and process various categories of personal information about you in connection with our products and services in the following ways: -

- information you/your representative gives to us whether over the phone, in person, in writing or through our website or emails
- interest in our products or services
- third parties who provide services to you or us, credit reference agencies, fraud prevention or government agencies
- information that we learn about you through our relationship
- information that we gather from the technology which you use to access our services (for example an IP address or telephone number)
- when you visit our website, we use analytics to gather anonymous data and user tracking information for understanding traffic numbers and site flow
- information that we gather from publicly available sources, such as company registers and online search engines

Most of your information will have been provided by you (or your employer) and collected when using our products and services. This may include your date of birth and National Insurance Number if we require a ULN (Unique Learner Number). To protect us and you, for example to prevent fraud or to make our services accessible to you, we may also process certain special categories of information with your explicit consent e.g. physical and mental health, to comply with the requirement to meet health and safety obligations and make reasonable adjustments.

In certain limited cases, additional sensitive personal data (racial or ethnic origin, political opinions, religious beliefs, trade union activities, sexual life, criminal offences or genetic or biometric data) may be collected by exam bodies but only with your explicit consent.

## **How the law protects you**

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. We must have one of the following reasons:

- to fulfil a contract
- when it is in our legitimate interest
- when you consent to it
- when it is our legal duty

### **Contract performance**

We may process your information where it is necessary for the performance of a contract with you for the provision of our products or services or to perform our obligations under that contract. Please note that if you do not agree to provide us with the requested information, it may not be possible for us to continue to provide products and services to you.

### **Legitimate interests**

A legitimate interest is when we have a business or commercial reason to use your information including but not limited to internal administrative purposes, product development and enhancement, preventing fraud, ensuring network and information security.

### **Consent**

We will gain consent from you to process personal data and in accordance with guidelines laid down by examining bodies and process your personal information for the performance of a contract.

### **Legal obligation**

We may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

## **Your data subject rights**

As well as our obligations, and commitment, to respect the privacy of your information, you also have certain rights relating to the personal information we hold about you which are

outlined below. None of these are absolute and are subject to various exceptions and limitations. You can exercise these rights at any time by contacting us using the contact details under the heading 'How we respond to your rights'.

You have the following rights under the GDPR:

### **Data Access Request**

You may request access to a copy of the personal information we hold about you.

We can refuse to provide information where to do so may reveal another person's personal data or would otherwise negatively impact another person's rights or where the request is manifestly unfounded or excessive.

### **Right to object**

In certain circumstances, you have the right to object to the processing of your personal information and to request us to restrict processing unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests or where we need to process your information to investigate and protect us or others from legal claims.

If you object to us processing your information, we may not be able to provide you with products and services.

### **Right to data portability**

Where we have requested your permission to process your personal information or you or your employer have provided us with information for the purposes of the performance of a contract with us, you have a right to receive the personal information you provided to us in a portable commonly used machine-readable format.

### **Right to erasure**

You can ask us to delete the personal information we hold about you when it is no longer required for a legitimate business need, legal or regulatory obligations or for the purposes it was collected for.

### **Right to rectification**

If your data changes or you believe that the personal information we hold about you is inaccurate or incomplete, please contact us as soon as possible so we can update it.

### **Right to restrict**

You have a right to restrict us from processing your personal information if you believe that: -

- any of the information that we hold about you is inaccurate
- we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims
- we are not using your information in a lawful manner

## **Right to object to direct marketing**

You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing.

## **How we respond to your rights**

You can exercise these rights at any time. Upon receipt of your written request and enough information to permit us to identify your personal data, we will disclose to you the personal data we hold about you within one month. We will also correct, amend or delete any personal data that is inaccurate and notify any third-party recipients of the necessary changes. If you wish to access or correct your personal data, please write to Data Protection, Business Edge Ltd, 6 Dragoon House, Hussar Court, Westside View, Waterlooville, Hants PO7 7SF.

## **Use of personal data**

We process your personal data only for specific and limited purposes. We ask only for data that is adequate, relevant and limited to what is necessary for the purpose for which it was collected. We use your personal data for the purposes registered in our notification at the Data Protection Register. Some of these purposes include the following: -

- for registration with examining bodies
- for renewal notification
- to provide you with administrative support and to respond to issues
- to provide products and services to you
- to notify you of products and services that might be of interest to you
- to notify you of updates and changes by email

We will only share relevant, essential personal data with your consent to carefully selected third parties to fulfil an obligation or order.

## **Disclosure of your personal data**

We do not share, sell or distribute your personal data with unrelated third parties except as set out above under 'Use of Personal Data' or under these limited circumstances: -

- in accordance with the purposes for which the data was originally collected or for purposes to which you have subsequently consented. For example, sometimes a third party may have access to your Personal Data to handle our mailings on our behalf.
- we may share or transfer the information in our databases to comply with a legal requirement, to protect your vital interests, to protect the security or integrity of our

databases or this website, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganisation, dissolution or similar event. Where appropriate, before disclosing Personal Data to a third party, we contractually require the third party to take adequate precautions to protect the security of that data. We strive to maintain that the Personal Data held in our databases is current, reliable, accurate and complete and to protect the privacy and security of our databases.

## **Protection of your personal data**

Our servers and databases are protected by industry standard security technology such as firewalls and password protection. The employees who have access to personal data shall handle such data properly and in accordance with training and security protocols and strict standards of confidentiality. We take all reasonable precautions to keep your personal information secure, including safeguards against unauthorised access, use or data loss. This includes ensuring our staff, partners and any third parties who perform work on our behalf comply with security standards as part of their contractual obligations. Where we are legally required to do so, if we suspect a data security breach, we will notify you and the applicable regulator within 72 hours.

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

We keep your Personal Data only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. To comply with contractual, legal, audit and other regulatory requirements personal data is retained for the duration of the contract and for a period of six years following termination or expiry.

## **Our use of cookies and other information gathering technologies**

As described above, we use technology to collect anonymous information about the use of our website. For example, we use technology to track which pages of our website our visitors view. We also use technology to determine which internet browsers our visitors use. This technology does not identify you personally - it simply enables us to compile statistics about our visitors and their use of our website.

Our website contains hyperlinks to other pages on our website. We use technology to track how often these links are used and which pages on our website our visitors choose to view. Again, this technology does not identify you personally - it simply enables us to compile statistics about the use of these hyperlinks.

We use this anonymous data to improve the content and functionality of the website and our email updates, to better understand our customers and markets and to improve our products and services.

To collect the anonymous data, we may use temporary “cookies” that collect the first level domain name of the user and date and time you accessed this website. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer’s hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. You can easily erase cookies.

We also use your IP address to help diagnose problems with our server and administer our website. An IP address is a numeric code that identifies our computer on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information, such as determining how many of our visitors are from outside of the UK. We may also perform IP lookups to determine which domain you are coming from (i.e. yourcompany.com) to more accurately gauge our users’ demographics.

Owing to the global nature of the Internet infrastructure, the information you provide may be transferred to countries outside the European Economic Area that do not have similar protections in place regarding your data and its use as set out in the policy. However, we will use strict security procedures to prevent unauthorised access.

## **Hyperlinks**

This Privacy Policy applies only to this website. This website contains hyperlinks to websites that are not operated by Business Edge. These hyperlinks are provided for your reference and convenience only and we do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not have any control over these websites and are not responsible for their data or privacy practices.

We urge you to review any privacy policy posted on any site you visit before using the website or providing any personal data about yourself. By submitting your information, you consent to the use of that information as set out in this Privacy policy.

## **Managing your communication preferences**

Business Edge communicates with you for the purposes of promoting its products and services. Once registered for communications, you can remove your consent at any time by opting to unsubscribe.

## **Making a data protection complaint**

If you think there is a problem with the way your data is being handled and we cannot address your concerns, you can contact the Information Commissioner’s Office (ICO). For more information visit [www.ico.org.uk](http://www.ico.org.uk).

## Your views

We welcome your views about our website and our Privacy Policy. If you would like to contact us with any queries or comments please send an email to [info@businessedgeltd.co.uk](mailto:info@businessedgeltd.co.uk) or write to Data Protection, Business Edge Ltd, 6 Dragoon House, Hussar Court, Westside View, Waterlooville, Hants PO7 7SF.