

Policy Name	Data Protection Policy (Learners)
Policy Code	ETP 8.2
Policy Author	Head of Training & Quality
Revision Number	2
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Expected Revision Date	+2 Years

8.2 Data Protection Policy (Learners)

8.2.1 Policy Statement

Elevation Training takes its obligations and responsibilities regarding privacy and data protection rights of all learners, staff, subcontractors, and community interests very seriously.

8.2.2 Scope

This policy applies to the Processing of Personal Data collected by Elevation Training, directly or indirectly, from all individuals.

This includes, but not limited to Elevation Training's, current, past or prospective job applicants, employees, learners, suppliers/vendors, contractors/subcontractors, shareholders or any third parties.

8.2.3 Collection and processing use of your Personal Data

Elevation Training is committed to complying with all applicable legislation relating to Personal Data and its systems ensure that Personal Data is collected and processed in accordance with the provisions of data protection regulations.

- Elevation Training does not collect or process personal data without having a lawful reason to do so. Elevation Training collects and processes learners' personal data for the performance of duties, or when necessary for compliance with a legal obligation. Elevation Training may also collect and process learner personal data for Elevation Training's legitimate interests except where such interests are overridden by specific learner interests or fundamental rights and freedoms.
- When collecting and processing (learner) personal data, Elevation Training provides a fair and full information notice or privacy statement about who is responsible for the processing of said personal data. This includes information pertaining to the purposes

for which personal data are processed, who the recipients are, what rights learners have are and how to exercise them, etc., unless it is impossible, or it requires disproportionate (or unnecessary) efforts to do so.

- Learner personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- When Elevation Training acts for its own purposes, Learner personal data is processed mainly for, but not limited to, the following:
 - registration
 - national certification
 - health and safety management
 - information security management
 - internal and external communication
 - any legal requirements
 - data analytics operations
 - legal corporate management
 - implementation of compliance processes.
- Elevation Training keep personal data that is processed accurately and, where necessary, up to date. Further, Elevation Training only keep personal data for as long as necessary and for the purposes for which data was processed.

8.2.4 Security of Personal Data

- Elevation Training implement appropriate technical and organizational measures to protect Personal Data against accidental or unlawful alteration or loss, or from unauthorized, use, disclosure, or access.

8.2.5 Disclosure of Personal Data

- Elevation Training can, in the usual course of its business and for the purposes of the processing, share Learner personal data with the relevant personnel within Elevation Training, or with its duly authorized contractors/subcontractors or clients. Such sharing facilitates consistency in Elevation Training learner engagement activities, and maximizes the quality and efficiency of its services and business operations.

- Elevation Training does not share Learner personal data with other parties unless you request it or have given us prior approval to such sharing.

8.2.6 Retention of Personal Data

- Data that is collected is stored only for the length of time that is of use, or that is necessary or required by law. Data is only retained if there is a legal, fiscal, administrative, or historical purpose.
- Data that is no longer required or useful, is destroyed by a documented disposal company in the context of physical (paper) copies and in relation to data stored on Elevation servers/drives, hard deletes are implemented when required.

8.2.7 International Personal Data Transfers

- European data protection law does not allow the transfer of Personal Data to countries outside UE/EEA that do not ensure an adequate level of data protection. We do not share Learner personal data with other parties unless Learners specifically request it or have afforded Elevation Training prior approval to facilitate such sharing.

8.2.8 Cookies

- Like many companies, the Elevation Training website may use “cookies.” Cookies are portions of text that are placed on the hard drive of a computer when accessing certain websites. Elevation Training may use cookies, for example, to help identify features in which potential Learners may have the greatest interest.
- Cookies may enhance an online experience by saving personal preferences when accessing a website. Elevation Training offers visitors (to its website) information concerning the types of cookies used and how to disable such cookies. When required by law, you are able to visit our website and refuse the use of cookies at any time on your computer.

8.2.9 Elevation Training - Learner rights

- Elevation Training is committed to ensuring protection of your rights under applicable laws. Below is a table summarizing your different rights:

Right of access	Elevation Training Learners can request access to their personal data. Learners may also request rectification of inaccurate personal data, or to have incomplete personal data completed. Learners can request any available information as to the source of the personal data, and they may also request a copy of their personal data being processed by Elevation Training.
Right to be forgotten	Elevation Training Learners rights to be forgotten entitles them to request the erasure of their personal data in cases where: <ul style="list-style-type: none"> i) the data is no longer necessary; ii) the Learner chooses to withdraw your consent; iii) the Learner objects to the processing of their personal data by automated means using technical specifications; iv) the Learner personal data has been unlawfully processed; v) there is a legal obligation to erase the Learner personal data; vi) erasure is required to ensure compliance with applicable laws.
Right to restriction of processing	Elevation Training Learners may request that processing of their personal data be restricted in the cases where: <ul style="list-style-type: none"> i) the Learner contests the accuracy of the personal data; ii) Elevation Training no longer needs the personal data, for the purposes of the processing; iii) The Learner has objected to processing for legitimate reasons.
Right to data portability	Elevation Training Learners can request, where applicable, the portability of the personal data that they have provided to Elevation Training, in a structured, commonly used, and machine-readable format. In this regard, Elevation Training Learners have the right to transmit this data to another Controller without hindrance from Elevation Training where: <ul style="list-style-type: none"> i) the processing of the Elevation Training Learner personal data is based on consent or on a contract; and ii) the processing is carried out by automated means. Elevation Training Learners can also request that their Personal Data be transmitted to a third party of your choice (where technically feasible).
Right to object to processing for the purposes of direct marketing	Elevation Training Learners may object (i.e. exercise their right to “opt-out”) to the processing of their personal data particularly in relation to profiling or to marketing communications. When Elevation Training processes Learner personal data, it does so based on (Elevation Training) Learner consent, and Learners can withdraw their consent at any time.
Right not to be subject to automated decisions	Elevation Training Learners have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal affect upon the Learner or significantly affects them.
Right to lodge a complaint to the competent Supervisory Authority	If Elevation Training Learners have a privacy-related complaint against the company, they should complete and submit the Complaint/Data Subjects’ Request Form or make their complaint by email or by letter in accordance with the Elevation Training Complaints/Requests Handling Procedure (ETPR 7.3) . If Learners are dissatisfied with the response from Elevation Training, s/he may then seek further recourse by contacting the relevant local Data Protection Office or the local competent court. Elevation Training Learners may also contact the lead Supervisory Authority, the Irish Data Protection Commission at https://www.dataprotection.ie/

To exercise these rights, Elevation Training Learners can send their Request or Complaint by sending an email to the Special Point of Contact at info@elevationtrainingireland.ie at which point the Learner is issued with a data subject request/complaint form ([ETSD 8.2](#))

8.2.10 Children

Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned, and their rights in relation to the processing of personal data.

Elevation Training does not collect and/or process data associated with minors (children). In particular, we do not promote or market our services to children. If it is believed that Elevation Training has mistakenly collected a personal data associated with a child, Elevation Training management should be contacted using the contact details provided in section 8.3.

8.2.11 Policy Update

Elevation Training may update this Data Protection Policy from time to time as company business changes or legal requirements change. If Elevation Training makes any significant changes to this policy, they will post a notice on the company website when the changes go into effect, and where appropriate, send a direct communication to registered Learners about the change.

8.3 Contact us

If you have questions about the collection and the processing of your Personal Data by Elevation Training, you can send your questions or complaints by sending an email to info@elevationtrainingireland.ie.

8.3.1 Definitions

➤ European data protection law or General Data Protection Regulation(GDPR)

The [General Data Protection Regulation \(GDPR\)](#) is the toughest privacy and security law in the world. Though it was drafted and passed by the European Union (EU), it imposes obligations onto organizations anywhere, so long as they target or collect data related to people in the EU. The regulation was put into effect on May 25, 2018.

8.3.2 Who is responsible

The Head of Training and Quality is responsible for implementing this policy.

Working Documents
Data Access Request/Complaint Form
Information & Data Management Policy (ETP 8.1)
Records Maintenance and Retention Procedure (ETPR 8.1)