

Clandestine Training Limited customer privacy notice

Registered name: Clandestine Training Limited

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on data protection principles, definitions, and key terms.

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Post

Clandestine Training Ltd, Unit 19, Centenary Park, Skylon Central, HEREFORD, , HR2 6FJ, GB

Telephone

07540596105

Email

m.ferries@ct-org.com

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health and safety information
- Account information
- Records of meetings and decisions
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details

We collect or use the following information to **prevent, detect, investigate or prosecute crimes:**

- Names and contact information
- Customer or client accounts and records
- Video and CCTV recordings of public areas (including indoor and outdoor spaces)
- Audio recordings of public areas (including indoor and outdoor spaces)
- Video and CCTV recordings of private or staff only areas

We collect or use the following information for **service updates or marketing purposes:**

- Names and contact details
- Addresses
- Marketing preferences
- Location data

We collect or use the following information to **comply with legal requirements:**

- Name
- Contact information
- Identification documents
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information

We collect or use the following information for **recruitment purposes:**

- Contact details (eg name, address, telephone number or personal email address)
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Payment details
- Purchase or service history

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Sub contractor agreements or Non Disclosure Agreements are required to protect the business interests of Clandestine Training. This requires us to collect sub contractors personal details.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to provide and improve products and services for clients are:

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Sub contractor agreements or Non Disclosure Agreements are required to protect the business interests of Clandestine Training. This requires us to collect sub contractors personal details

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for the operation of customer accounts and guarantees are:

Our lawful bases for collecting or using personal information to **prevent, detect, investigate or prosecute crimes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for recruitment purposes are:

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- Publicly available sources
- Previous employers
- Suppliers and service providers

How long we keep information

[Paste your retention schedule here.]

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

[You said you had a retention schedule, but it wasn't available online. You can paste it above - you must not publish the privacy notice without it.]

Who we share information with Others

we share personal information with

- Suppliers and service providers

Sharing information outside the UK

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

Organisation name: Army

Category of recipient: Military

Country the personal information is sent to: Germany

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: m.ferries@ct-org.com

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>