

DATA PROTECTION & PRIVACY STATEMENT

Bratton Ltd & Bratton Training Ltd



1. Introduction

The Bratton Group is a brand comprising of the trading companies Bratton Limited and Bratton Training Limited.

We also offer a number of services, trading under different brands. You can see our brands and other registered non-trading companies at the end of this document. This statement applies to all our companies and brands.

When we collect personal information, we may share it across our companies. This document explains how we use any personal information we might collect.

2. What information we hold

2.1. Information that relates directly to you, such as:

2.1.1. Contact details

2.1.2. Demographic information

2.1.3. Social media usernames

2.1.4. Personal goals

2.1.5. Internet address (IP addresses are collected in our webserver log files)

2.1.6. Course work you have submitted

2.1.7. CVs and work history, you have submitted to us

2.1.8. Prior learning details

2.1.9. Materials we have produced for you

2.1.10. Digital correspondence with us

2.1.11. Account login details for your domain name and web hosting where we have set these up for you

2.2. Information relating to your business.

3. How we might use your personal information

3.1. Delivery of our contract with you

3.2. Make sure the products and services we provide to you are correctly administered

3.3. Provide you with relevant information that may be of use to you or your business

3.4. Recommend your business to contacts of ours

3.5. With your permission, ask contacts in our network to connect with you

3.6. Inform you of our products, services or promotions

3.7. Ways we may contact you include; email, post, telephone, SMS text message or social media

3.8. Keep you updated about services that you have subscribed to.

4. How we gather your personal information

4.1. Provided by you directly to us

4.2. Passed onto us by your contacts

4.3. Publicly accessible information

4.4. Provided to us by our partner organisations, such as the ILM

4.5. When you visit our websites

4.6. Collected from our surveys and questionnaires.

5. Legal basis for data processing

5.1. The legal bases on which we collect, store or process personal data are:



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- To perform a contract
- The data subject has given their consent
- In the legitimate interests of either ourselves or the data subject
- Our compliance with a legal obligation.

6. Your data protection rights

- 6.1. Your rights are detailed in the GDPR regulations, a summary can be found on the Information Commissioners Office (ICO) website <https://ico.org.uk/>
- 6.2. You have rights under the Data Protection Act 1998, these can also be found on the ICO website
- 6.3. To update your details or to exercise your other rights under these regulations, please provide your request in writing to the registered company address or email data@thebrattongroup.co.uk. We may require you to provide proof of identification.

7. Cookies

- 7.1. A cookie is a small piece of information that is placed on your computer when you visit certain websites
- 7.2. We use third party analytics cookies, which are placed by or on behalf of companies such as Google;
 - 7.2.1. They are used for statistical analysis by us to look at the number of and types of visitors to our websites
 - 7.2.2. We have no access to personal information from these third-party cookies
 - 7.2.3. The third-party organisations that place cookies have their own strict privacy policies
- 7.3. You can turn off cookies within your web browser:
 - 7.3.1. To do this look at the 'help' menu on your browser
 - 7.3.2. Switching off cookies will not restrict your use of our websites.

8. Protecting your personal information

- 8.1. Our primary store of your personal information is stored securely on our servers which are password protected and not directly accessible from the internet
- 8.2. Your personal information may also be stored in the wider internet under secure cloud-based storage services, such as Dropbox, Google Drive and Microsoft One Drive
- 8.3. We invest in high-quality security to protect your privacy. No information transmission over the internet can be entirely secure, and therefore we cannot guarantee the security of your personal information. Any information that you send is at your own risk. However, once we have received your personal information we use strict procedures to protect the security of your personal information
- 8.4. Any paper copies of your personal information are stored within our premises and are kept with us or stored securely
- 8.5. Laptops and mobile devices are password protected but not necessarily encrypted
- 8.6. Any password you provide when registering with our websites is encrypted to ensure protection against unauthorised access; we do not have access to read these passwords
- 8.7. Your personal information provided to our websites is stored securely on our web server
- 8.8. Where we store your information electronically:
 - 8.8.1. Our in-house data storage where your personal information may be stored is in the European Economic Area (EEA) or the UK
 - 8.8.2. The personal information that we collect from you may also be uploaded and stored outside the European Economic Area (EEA) in order to carry out the activities listed in 'Use of Your Personal information' section



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above. For example, we are unable to dictate the storage location used by Dropbox and Google Drive file storage services.

9. Disclosing your personal information

- 9.1. We do not pass your personal information to third parties for marketing purposes without your permission
- 9.2. We may disclose your personal information to fulfil a contract with a third-party client, but only where your consent has been provided
- 9.3. We sometimes share your personal information with subcontractors providing products and services on our behalf
- 9.4. Our subcontractors may have access to your personal information, this will only be used to provide our services
- 9.5. If you are receiving ILM training from us, then we will disclose some of your personal information with the ILM in order for us to deliver your training and manage our contract with the ILM. The ILM have their own privacy policy which covers their use of your personal information
- 9.6. We disclose details of your invoices with our accountant for reporting purposes
- 9.7. We may disclose your personal information to buyers if we were to sell our business, if we are required to do so
- 9.8. We may disclose your personal information, in response to orders by the government or law enforcement authorities.

10. How long we store your personal information

- 10.1. If you are a client we may retain your personal information for a period of 9 years to ensure we are able to comply with any contractual, legal, audit, investigation and regulatory requirements
- 10.2. If we have an ongoing relationship with you then we may retain your personal information for longer than 9 years
- 10.3. If you are not a client, we may keep your personal information for up to 7 years following our last contact with you.

11. Changes to this Statement

- 11.1. If we change this statement, we will post an updated version on our website. Please check the website regularly for any changes
- 11.2. If you believe that we have not adhered to this Statement, please notify us by email at data@thebrattongroup.co.uk and we will address your concern promptly
- 11.3. This Statement was last updated on 21st May 2018.



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12. Our Companies and Brands

Registered Company	Registration number in England & Wales
Bratton Limited	07985697
Bratton Training Limited	08448115
Bratton Management Limited	08848207
Bratton Projects Limited	08848101
Bratton Technical Limited	08848306

Our Brands
The Bratton Group
Bratton Training
Bratton Management
Bratton Projects
Bratton Technical
Business Babble

