

Data Protection Policy Alpha International Training Ltd.

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Definitions

Organisation 'ALPHA'	Alpha International Training Ltd. Registered company number: 15091222
DPA	Data Protection Act 2018 which implements the EU's General Data Protection Regulation.
Responsible Person	Chief Executive Officer
Register of Systems	Register of all systems or contexts in which personal data is processed by ALPHA.

1. Data protection principles

ALPHA is committed to processing data in accordance with its responsibilities under the DPA.

DPA requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate

technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by ALPHA.
- b. The Responsible Person shall take responsibility for ALPHA’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. ALPHA is registered with the Information Commissioner’s Office. Registration number ZB630026

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, ALPHA shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to ALPHA shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by ALPHA must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. ALPHA shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in ALPHA’s systems.

5. Data minimisation

- a. ALPHA shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Commitment to Limited Data Collection: ALPHA adheres to the principle of data minimisation, ensuring that we collect only the data that is essential for the effective delivery of our training services and for fulfilling our legal and contractual obligations. We are committed to ensuring that the data we collect is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is

processed, implementing the following strategies:

1. Purpose Specification: Before collecting any data, we clearly define and document the specific purposes for which the data is required. This ensures that every piece of data collected is aligned with a legitimate, specific purpose.
 2. Data Collection Limitation: In practice, we limit the collection of personal data to what is directly relevant and necessary to accomplish the specified purpose. This approach applies to all data collection methods, whether digital or paper-based.
 3. Regular Review and Evaluation: We periodically review our data collection processes to ensure ongoing compliance with the principle of data minimisation. This includes evaluating whether the data currently being collected is still relevant and necessary for the specified purposes.
 4. Employee Training and Awareness: All employees are trained in the importance of data minimisation and are instructed to collect only the data necessary for the specific task or project they are involved in. Regular training sessions are conducted to reinforce this principle.
 5. Data Collection Forms and Tools: Our data collection forms and tools are designed to discourage the collection of extraneous data. They are regularly reviewed and updated to align with our data minimisation objectives.
 6. Data Retention Policies: Consistent with data minimisation, we maintain strict data retention policies, ensuring that personal data is not kept longer than necessary in relation to the purpose for which it is processed.
- c. Accountability and Compliance: We take our responsibility for data minimisation seriously and regularly audit our practices for compliance. Any deviations from our established policies are addressed promptly to ensure ongoing adherence to these principles.

6. Accuracy

- a. ALPHA shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Commitment to Data Accuracy: ALPHA is committed to maintaining the accuracy of the personal data we collect, use, and store. We recognise that accurate data is crucial not only for providing high-quality training services but also for respecting the rights and integrity of the individuals whose data we handle.

- d. **Data Collection Accuracy:** At the point of data collection, we take all reasonable steps to ensure that the data gathered is accurate and, where necessary, updated. This includes providing individuals with the opportunity to review and confirm their data at the time of collection.
- e. **Regular Data Review and Updating:** We conduct regular reviews of the data we hold to identify and correct any inaccuracies. This includes reaching out to individuals to verify their information, particularly when the data is going to be used to make significant decisions that affect them, such as registration and certification.
- f. **Responsiveness to Data Correction Requests:** We respond promptly and efficiently to requests from individuals to correct or update their personal data. Clear procedures are in place for individuals to flag any inaccuracies in their data and request amendments.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, ALPHA shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. ALPHA shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, ALPHA shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

End of Policy