

Data Protection Policy

Creative Consulting and Training Ltd

Last updated: August 2026

1. Purpose and Scope

This Data Protection Policy outlines how Creative Consulting and Training Ltd (“Creative”, “we”, “our”, or “us”) collects, uses, stores and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable privacy laws.

This policy applies to:

- All employees, contractors, trainers and learners;
- All personal data processed by Creative in any format, whether electronic or paper-based; and
- All activities, systems and processes involving personal data.

Creative is committed to maintaining appropriate human, technical and organisational resources to protect personal data and the rights and freedoms of data subjects.

2. Data Protection Principles

We commit to the following key principles when handling personal data:

- Lawfulness, fairness and transparency;
- Purpose limitation;
- Data minimisation;
- Accuracy;
- Storage limitation;
- Integrity and confidentiality; and
- Accountability.

Personal data will only be processed where there is an appropriate lawful basis and will be protected through proportionate technical and organisational controls.

3. Roles and Responsibilities

Responsibility for data protection compliance is overseen by Creative Consulting and Training Ltd's management.

Data protection enquiries, requests from data subjects and reports of suspected personal data breaches should be directed to:

Email: info@trainingcreatively.com

All employees, contractors and other personnel processing personal data on behalf of Creative are required to comply with this policy and any supporting procedures and to undertake appropriate data protection training.

Where third parties process personal data on our behalf, appropriate contractual and due diligence arrangements will be used to ensure that personal data is handled securely and in accordance with applicable data protection law.

4. Lawful Basis for Processing

We process personal data under one or more lawful bases, including:

- Contractual obligation, for example course enrolment and service delivery;
- Legal obligation, for example financial and regulatory record keeping;
- Legitimate interests, where those interests are not overridden by the rights and freedoms of individuals; and
- Consent, where appropriate, for example subscribing to marketing communications.

Where processing relies on consent, consent will be freely given, specific, informed and unambiguous. Consent will be obtained through a clear affirmative action and, where required, recorded so that it can be demonstrated and audited.

Individuals may withdraw their consent at any time. Withdrawal will be made as straightforward as giving consent and will not affect the lawfulness of processing undertaken before withdrawal.

5. What Data We Collect

We may collect and process:

- Full name, email address, phone number and physical address;
- Job title and organisation name;
- Course registration and attendance records;
- Payment and billing details;
- Exam registration data;
- Marketing preferences and consent; and
- Other personal information reasonably required for the provision and administration of our services.

We will only collect personal data that is adequate, relevant and limited to what is necessary for the intended purpose.

6. How We Use Personal Data

We use personal data to:

- Manage course bookings and deliver training and consultancy services;
- Send digital manuals and post printed manuals to course delegates;
- Register candidates for certification examinations;
- Issue certificates of attendance or achievement;
- Maintain appropriate financial, contractual and academic records;
- Respond to enquiries and support requests;
- Administer customer and supplier relationships; and
- Send promotional updates where consented to or otherwise legally permitted.

Personal data will not be used for purposes incompatible with the purpose for which it was originally collected unless permitted by law.

7. Data Sharing

We may share personal data where necessary with:

- Accrediting and awarding bodies;
- Trainers or consultants engaged for service delivery;
- Cloud storage, CRM and other technology service providers;
- Examination platforms or proctoring services;
- Payment service providers; and
- Other suppliers or processors required to support the delivery of our services.

Third parties processing personal data on our behalf are required to handle personal data securely and in accordance with applicable data protection law.

Where required, appropriate data processing terms will be established with processors and suppliers.

8. Data Retention and Records of Processing

Personal data is retained only for as long as necessary for the purposes for which it was collected and in accordance with applicable legal, regulatory, contractual and accreditation requirements.

Delegates' course records may be retained for a minimum of seven years where required for certification and audit purposes.

Marketing data is reviewed regularly and removed or updated following valid requests, withdrawal of consent or opt-out.

Creative maintains appropriate records of its personal data processing activities. These records may include:

- Categories and purposes of processing;
- Categories of personal data and data subjects;
- Recipients or categories of recipients;
- Applicable lawful bases;
- International transfers and associated safeguards, where applicable;
- Retention arrangements; and
- Relevant technical and organisational security measures.

Records are reviewed and updated where processing activities materially change.

9. Data Security, Confidentiality, Integrity and Availability

We implement appropriate technical and organisational measures designed to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, alteration or disclosure.

Measures include, as appropriate:

- Password-protected systems and access controls;
- Access to personal data based on business need and authorised responsibilities;
- Data encryption where appropriate;
- Secure backup arrangements;
- Controls designed to support the confidentiality, integrity and availability of information;
- Appropriate measures to maintain the resilience of systems and services used to process personal data;
- Staff data protection and information security training;
- Appropriate supplier and processor controls; and
- Periodic review of security arrangements and policies.

Creative periodically assesses the effectiveness of its technical and organisational measures. This may include reviews of access controls, backup arrangements, security configurations, supplier controls, data protection practices and identified risks.

Identified weaknesses or areas for improvement will be recorded and addressed proportionately according to risk.

10. Data Subject Rights

Under applicable data protection law, individuals may have the right to:

- Receive appropriate privacy information about how their data is processed;
- Access their personal data;
- Rectify inaccurate or incomplete personal data;
- Request deletion of personal data where applicable;
- Restrict or object to processing where applicable;
- Withdraw consent where processing is based on consent; and
- Receive or transfer their personal data where the right to data portability applies.

Requests will be handled without undue delay and within applicable statutory timescales.

Appropriate procedures will be used to verify the identity of individuals making requests and to record and manage requests through to completion.

To exercise data protection rights, individuals may contact:

info@trainingcreatively.com

11. International Transfers

Where personal data is transferred outside the UK, Creative will ensure that the transfer is lawful and that an appropriate safeguard is in place where required.

Depending on the circumstances, safeguards may include:

- UK adequacy regulations;
- The UK International Data Transfer Agreement or applicable UK Addendum;
- Appropriate contractual safeguards; or
- Other transfer mechanisms permitted under UK data protection law.

International data transfers will be considered as part of our supplier and processing arrangements where applicable.

12. Data Breaches

All suspected or actual personal data breaches must be reported promptly to the designated data protection contact.

Creative will assess reported incidents to determine their nature, scope, impact and risk to affected individuals.

Where legally required, personal data breaches will be reported to the Information Commissioner's Office within the applicable statutory timeframe, including within 72 hours of becoming aware of a notifiable breach.

Affected individuals will also be informed without undue delay where required by applicable data protection law.

Appropriate records of personal data breaches, assessments and actions taken will be maintained.

13. Training, Monitoring and Compliance

All relevant staff receive appropriate data protection training and are expected to understand their responsibilities when processing personal data.

Creative will periodically review and, where appropriate, test and evaluate the effectiveness of the technical and organisational measures used to protect personal data.

Compliance activities may include:

- Review of data protection and information security policies;
- Review of records of processing activities;
- Review of access controls and user permissions;
- Review of data retention arrangements;
- Review of suppliers and processors where appropriate;
- Review of international data-transfer arrangements;
- Review of data breaches, incidents and lessons learned; and
- Assessment of relevant risks and corrective actions.

This policy will be reviewed at least annually and updated where necessary to reflect changes in legislation, regulatory guidance, technology, business operations or identified risks.

14. Contact Information

For questions about this policy, the processing of personal data or the exercise of data protection rights, contact:

Creative Consulting and Training Ltd

Email: info@trainingcreatively.com

Phone: 0208 500 4534

Website: www.trainingcreatively.com