

## **Data Protection Policy**

### **Creative Consulting and Training Ltd**

*Last updated: November 21, 2025*

#### **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 (electronic or paper-based)
- All activities, systems, and processes involving personal data

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#### **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**
- **Accountability**

### 3. Roles and Responsibilities

- **Data Protection Officer (DPO):** [Appoint someone or say “not mandatory for our size, but contact [info@trainingcreatively.com](mailto:info@trainingcreatively.com) for data matters.”]
  - **All staff and contractors** must follow this policy and attend training when required.
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### 4. Lawful Basis for Processing

We process personal data under one or more of the following legal bases:

- **Contractual obligation** (e.g., course enrolment)
  - **Legal obligation** (e.g., exam results, financial reporting)
  - **Legitimate interest** (e.g., marketing to past delegates)
  - **Consent** (e.g., subscribing to our newsletter)
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### 5. What Data We Collect

We may collect and process:

- Full name, email address, phone number and physical address
- Job title, organisation name
- Course registration and attendance records
- Payment and billing details
- Exam registration data (shared with awarding bodies)
- Marketing preferences and consent

## 6. How We Use Personal Data

We use personal data to:

- Manage course bookings and deliver training
  - Send digital manuals and post printed manuals to course delegates
  - Register candidates for certification exams
  - Issue certificates of attendance or achievement
  - Maintain financial and academic records
  - Respond to enquiries and support requests
  - Send promotional updates (where consented or legally permitted)
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## 7. Data Sharing

We may share personal data with:

- **Accrediting bodies** (e.g., ISACA, APMG, BCS, PEOPLECERT)
- **Trainers or consultants** engaged for course delivery
- **Third-party service providers**, including:
  - Cloud storage providers (e.g., Zoho CRM, Campaigns)
  - Exam platforms or proctoring services
  - Payment gateways

All third parties are required to handle data securely and in accordance with data protection laws.

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## 8. Data Retention

- Personal data is retained only as long as necessary for the purposes stated.

- Delegates' course records are retained for a minimum of 7 years to comply with certification and audit requirements.
  - Marketing data is reviewed regularly and removed upon request or opt-out.
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## 9. Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

- Password-protected systems and access controls
  - Data encryption and secure backups
  - Staff training and regular policy reviews
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## 10. Your Rights

Under data protection laws, you have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request deletion of data ("right to be forgotten")
- Restrict or object to processing
- Withdraw consent at any time
- Data portability (where applicable)

To exercise your rights, contact: **info@trainingcreatively.com**

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## **11. International Transfers**

Where personal data is transferred outside the UK (e.g., to service providers), we ensure appropriate safeguards are in place, such as:

- Adequacy decisions
  - Standard Contractual Clauses (SCCs)
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## **12. Data Breaches**

All suspected data breaches must be reported immediately to the DPO or designated contact. If necessary, breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours and affected individuals will be notified without undue delay.

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## **13. Training and Compliance**

- All staff receive appropriate data protection training.
  - This policy is reviewed annually and updated as needed.
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## **14. Contact Information**

For any questions about this policy or how we handle your data:

**Creative Consulting and Training Ltd**

Email: [info@trainingcreatively.com](mailto:info@trainingcreatively.com)

Phone: 0208 500 4534

Website: <https://www.trainingcreatively.com>