

# General Data Protection Regulations (GDPR) and Privacy policy

Last Updated: August 2025

The National Centre for Smoking Cessation and Training (NCSCT, "we", "us", "our") is a Community Interest Company dedicated to supporting the delivery of effective, evidence-based tobacco control programmes and smoking cessation services.

This policy explains how we collect, use, and store personal data collected from visitors to our website, including those who browse our site, make purchases, or register for online training courses.

Please note that this policy does not apply to the NCSCT virtual training courses. A separate *Virtual training course attendee privacy* notice is supplied ahead of all courses or can be requested from training@ncsct.co.uk.

The NCSCT is committed to ensuring that your personal data is collected, processed, and protected in compliance with the UK General Data Protection Regulation (UK GDPR) and, where applicable, the EU General Data Protection Regulation (EU GDPR). We are committed to protecting your personal data and ensuring transparency about how it is used. You are therefore encouraged to read this policy.

As we may update this policy from time to time, we encourage you to review it regularly. If we make significant changes that impact your rights, we will notify you clearly via email.

For any questions about this policy or to exercise your data protection rights, please contact our Data Protection Officer (DPO), Dulcie Brewer: <a href="mailto:dulcie.brewer@ncsct.co.uk">dulcie.brewer@ncsct.co.uk</a>

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#### Who we are

This website is operated by the NCSCT Community Interest Company, registered in England and Wales with Company number: 07394485.

The NCSCT are registered as a data controller with the UK Information Commissioner's Office (ICO) under registration number: Z2647905.

You can call us: 01305 755 828

You can email us: <a href="mailto:enquiries@ncsct.co.uk">enquiries@ncsct.co.uk</a> or <a href="mailto:dulcie.brewer@ncsct.co.uk">dulcie.brewer@ncsct.co.uk</a>

Our postal address:

**NCSCT** 

1 Great Western Industrial Centre

Dorchester

Dorset

DT1 1RD

### What personal data we collect

Personal data refers to any information that can identify you directly or indirectly. We only collect personal data that is relevant and necessary for its intended purpose.

We collect the following types of personal data:

- Identity and contact data: Name, email address, phone number, and job title -Typically work-related, not personal details
- **Biographical data**: Employer name, local authority (if applicable), background profession, smoking cessation role, and areas of interest
- Login data: Username and password for accessing online training
- **Training data**: Details of your online training activity courses registered for, assessment results, and certification status
- Preference data: Your choices regarding email bulletins and other communications
- Communications data: Correspondence sent via email, post, or social media

• Analytical data: Technical data collected when you browse our website, such as your IP address, device type, browser version, pages visited, and links clicked. This data is anonymised and not used to identify individuals

We do **not** collect any special category data (e.g., race, religious beliefs, health data, sexual orientation, political opinion, union membership) unless explicitly provided by you, nor do we collect any information about criminal convictions or offences.

### How we use your personal data

The NCSCT processes personal data lawfully, fairly, and transparently. This means we only collect and use your data where there is a clear legal basis, including:

- to provide online training and assessment programmes which you are using, or about to use
- where necessary for our legitimate interests or those of a third party, provided those interests do not override your fundamental rights and interests
- where we need to comply with a legal or regulatory obligation
- when you have given explicit permission for us to process your data for a specific purpose

# Legal basis for processing your personal data

#### NCSCT relies on the following legal bases to process your personal data:

Purpose	Categories of data	Legal basis
Register you for online training or shop accounts	Identity and Contact; Login	Performance of contract; Necessary for our legitimate interests
Provide online training and assessment certification	Identity and Contact; Biographical; Login; Online Training	Performance of contract
Publish NCSCT Certified Practitioners list	Identity and Contact; Online Training	Consent
Send newsletters and bulletins	Identity and Contact; Preference	Consent
Respond to queries	Identity and Contact; Communications	Legitimate interests
Improve website functionality	Analytical	Legitimate interests

We only send email communications with your explicit opt-in consent. You can withdraw this consent at any time by clicking the "unsubscribe" link in our emails or by contacting us directly through <a href="mailto:enquiries@ncsct.co.uk">enquiries@ncsct.co.uk</a> or <a href="mailto:dulcie.brewer@ncsct.co.uk">dulcie.brewer@ncsct.co.uk</a>.

### Who we share your data with

#### We may share your anonymised data with:

- Service providers: Hosting providers, email platforms, and analytics services
- **Employers**: If relevant to your training or certification
- Regulators: HMRC or ICO, if legally required
- Research partners: Aggregated, anonymised data may be shared with public health bodies

We do **not** sell your personal data to third parties.

All third-party service providers who store or process personal data on our behalf are bound by data processing agreements that ensure compliance with the UK GDPR and provide appropriate safeguards.

# Where is your personal data stored?

We store personal data in the United Kingdom and the European Economic Area (EEA). If any technical service providers are based outside these regions, we will ensure appropriate safeguards are in place, such as adequacy decisions or standard contractual clauses approved by the UK Information Commissioner's Office (ICO) or the European Commission, and we will ensure it is protected by appropriate safeguards (UK adequacy regulations or UK Addendum to Standard Contractual Clauses).

### Data Protection by Design and Default

We have robust security measures to prevent unauthorised access, alteration, or disclosure of your data. We implement technical and organizational measures to ensure data protection principles are integrated into our processing activities from the outset. This includes encryption, access controls, regular security audits, and the use of VPNs by staff when accessing or processing personal data.

Access is restricted to those who genuinely need it, and we are all bound by confidentiality. Those within the organisation with access to your data must use a VPN

In the event of a data breach, we will notify the ICO without undue delay and, where legally required, inform affected individuals.

#### Data retention

We only keep personal data for as long as necessary in connection with the purposes we collected it for and to comply with any legal, accounting, or reporting requirements. For example:

- **Purchases**: Retained for six years for tax purposes
- Marketing preferences: Retained until you unsubscribe
- Training records: Retained as long as necessary for certification purposes
- Anonymised data: May be used for research or statistical purposes indefinitely

We review retention periods regularly to ensure we only keep personal data for as long as necessary.

#### Cookies

Our website uses cookies (small text files stored on your device) for the following purposes:

- Strictly Necessary Cookies: Enable secure logins and transactions
- Analytics Cookies: Help us understand how you use our website

We only use non-essential cookies with your consent. You can manage your cookie preferences through your browser settings, and you can change your preferences or withdraw consent at any time. If you block or restrict cookies, you may not be able to use certain features of our website. Learn more at All About Cookies.

Cookie	Туре	Duration	Purpose
PHPSESSID	Strictly Necessary	Session (until closed)	Maintains user session data

# Your data protection rights

You have the following rights under UK data protection law:

Right to be informed: To know how we collect and use your personal data

- Right of access: To request a copy of the personal data we hold about you
- Right to rectification: To request correction of inaccurate or incomplete data
- Right to erasure (right to be forgotten): To request deletion of your personal data
- **Right to restrict processing:** To request that we limit how we use your data in certain circumstances
- **Right to data portability:** To request a structured, commonly used format of your data for transfer to another organisation
- Right to object: To object to processing based on legitimate interests
- Rights related to automated decision-making and profiling: We do not conduct automated decision-making, including profiling, that produces legal or similarly significant effects on individuals.

To exercise your rights, contact us at <u>dulcie.brewer@ncsct.co.uk</u>. We aim to respond to all data protection requests within one month. If your request is particularly complex, or you have made multiple requests, we may extend this by two further months. We will always inform you of any delay and explain why.

You will not be charged a fee to exercise these rights unless a request is clearly unfounded or excessive, in which case we may charge a reasonable fee or refuse the request. We may also need to verify your identity before fulfilling your request.

For more information about your rights, or if you're unsatisfied you can also complain to the ICO:

Website: www.ico.org.uk/your-data-matters

Telephone: 0303 123 1113

#### Feedback

We strive for clear, accessible policies. If you have feedback or questions about this policy or want to exercise your data protection rights, please contact us at:

enquiries@ncsct.co.uk or dulcie.brewer@lancaster.ac.uk

# Review log

Document name		Privacy policy	Document Andy McEwen Owner		
Origination date		October 2018			
Version	Review date	Reviewed by	Description		
V1	May 2019	AMc	Annual review		
V1	May 2020	AMc	Annual review		
V1	May 2021	AMc	Annual review		
V1	May 2022	AMc	Annual review		
V1	May 2023	AMc	Annual review		
V1	May 2024	AMc	Annual review		
V2	March 2025	JMc	Review and update as part of CE+ process		
V3	July – August 2025	DB	Review		