

## Privacy notice

NCSCT CIC provides training, resource and consultancy services based at Unit 10 Wincombe Business Centre, Shaftesbury, Dorset. This privacy notice provides information about the personal information we process about you as a data controller, in compliance with the General Data Protection Regulation (GDPR).

ICO registration number: Z2647905

Please contact Dulcie Brewer, [dulcie.brewer@ncsct.co.uk](mailto:dulcie.brewer@ncsct.co.uk) or [enquiries@ncsct.co.uk](mailto:enquiries@ncsct.co.uk), with any questions or requests about the personal information we process.

This privacy notice applies to personal information processed by or on behalf of NCSCT.

### Your rights

The NCSCT are committed to protecting your rights to privacy. They include the:

- Right to be informed about what we do with your personal data
- Right to have a copy of all the personal information we process about you
- Right to rectification of any inaccurate data we process, and to add to the information we hold about you if it is incomplete
- Right to be forgotten and your personal data destroyed
- Right to restrict the processing of your personal data
- Right to object to the processing we carry out based on our legitimate interest

The personal data we process, why we process it, where it comes from and the legal basis for doing so.

The NCSCT processes personal data under several lawful bases as defined in Article 6 of UK GDPR, including:

- **Consent** (e.g., for optional email updates);
- **Contract** (e.g., virtual training);
- **Legal obligation** (e.g., payroll, tax records);
- **Legitimate interests** (e.g., service evaluation, business development).

### Training for health and social care professionals

The NCSCT process the personal data of individuals who are obtaining training from us.

The personal data includes:

- a. First name.
- b. Last name

- c. Working Location – Name and Location of Medical Centre
- d. Rank (e.g. Military Sgt, Cpl; Civilian)
- e. Service (Army, Navy, RAF, Civilian)
- f. Job Title
- g. Background/Profession (e.g. Dr, Nurse, PTI etc)

Individuals consent to the transfer of their personal data to us, and for us to supply this to clients (i.e. via quarterly reports). Where an individual has consented, he or she may easily withdraw it by notifying Dulcie Brewer through [dulcie.brewer@ncsct.co.uk](mailto:dulcie.brewer@ncsct.co.uk) or through [enquiries@ncsct.co.uk](mailto:enquiries@ncsct.co.uk).

Any data shared with third parties, such as service providers or regulatory bodies, is done under GDPR-compliant contracts, ensuring they also have appropriate measures in place.

### Other personal data

The NCSCT processes personal data pursuant to our legitimate interests in running our business such as:

- Invoices and receipts
- Accounts, VAT and tax returns
- Insurance policies and related documents
- Bank details

As an employer, the NCSCT process personal data further to contracts of employment with our employees. The information includes:

- Names, addresses and contact details
- Pay and bank details, pay slips
- Curricula vitae, contracts of employment, references and appraisals
- Health information (in reliance on the occupational health exemption contained in the Data Protection Act 2018)

Finally, the NCSCT run a client relationship management system. Any personal data on the system is held in accordance with the consent of the data subject which can be withdrawn at any time by contacting Name above.

### How the NCSCT use your information

Personal data in legal cases is retained, where necessary, for six years in compliance with our professional indemnity obligations. Where this is not necessary, it is destroyed on the conclusion of the case.

## Retention period

Retention periods are calculated from the date of employment termination, contract completion, or last meaningful contact. Records may be kept longer where required for legal compliance or pending claims.

Personal data in legal cases is retained, where necessary, for six years in compliance with our professional indemnity obligations. Where this is not necessary, it is destroyed on the conclusion of the case.

Administrative data is retained for up to six years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner. Where it is not necessary to retain the data for six years, it is destroyed as soon as possible.

Personal data relating to employees who have left our employment is also retained for up to six years as necessary. This is the time limit for bringing a breach of contract claim. In some cases we destroy it as soon as the employee leaves.

## Whom do we share personal data with?

The NCSCT share personal data internally strictly on a need-to-know basis.

Special category data and personnel files held electronically are encrypted with restricted access. Hard copy special category and other personal data is stored securely with restricted access.

The NCSCT do not share personal data with anyone external to the organisation, other than with:

- Outsourced service providers such as photocopying companies and digital dictation services, pursuant to GDPR compliant written contracts
- HMRC and the VAT Commissioner as they require
- With others pursuant to a court order
- GP or health/ social care professionals if risk to the person or others is a concern
- With regulatory bodies as part of any investigation as requested

## Information Commissioner's Office

If you have any concerns about the way your personal information has been processed, please contact Dr Andy McEwen at [enquiries@ncsct.co.uk](mailto:enquiries@ncsct.co.uk).

Alternatively, you may contact the Information Commissioner's Office on 0303 123 1113.