Laser Education Limited is committed to the correct, lawful and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

#### The Data Protection Principles

This Policy aims to ensure compliance with the General Data Protection Regulation (EU) 2016/679 ('GDPR') which came into effect on May 25<sup>th</sup>, 2018.

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- 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 it is processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is 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 is 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 GDPR in order to safeguard the rights and freedoms of the data subject;
- 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.

#### The Rights of Data Subjects

The GDPR sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;

- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

#### Lawful, Fair, and Transparent Data Processing

The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) The processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) The processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) The processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- g) If the personal data in question is "special category data" (also known as "sensitive personal data") (for example, data concerning the data subject's race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:
- h) The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);
- The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field or employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject if physically or legally incapable of giving consent;
- k) The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing s carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
- I) The processing relates to personal data which is clearly made public by the data subject;
- m) The processing is necessary for the conduct of legal claims or whenever courts are acting in the judicial capacity;
- n) The processing is necessary for the substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;

- o) The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medicine diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU member state law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;
- p) The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State Law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or
- q) The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State Law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable specific measures to safeguard the fundamental rights and the interests of the data subject.

## How We Collect Your Data

You may give your personal details to us via an application or registration form, if you voluntarily complete a survey, questionnaire or provide feedback, or if you use or view our website.

We collect your personal data (which may include sensitive personal data) and process your personal data for the purposes of providing you with information relating to our training and education or professional support services.

The following personal data may be collected, held, and processed by Laser Education Limited:

- Personal identification information (name, date of birth, address, phone numbers and email address) for the purpose of identifying course delegates or customers or for future correspondence we may send out (e.g. course joining instructions, course notes, quotations, etc);
- b) Details of contact we have had with you when you have attended a training event or from queries you have made;
- c) Details of training you have attended, for the purpose of providing further support and advise;
- d) Learners experience feedback, for the purpose of carrying out statistics and improving our education provision;
- e) Information about complaints, for the purpose of investigating and improving our procedures;
- f) Notes and records about any services we have provided, for the purpose of providing you with professional support or guidance;
- g) Other information we received from other sources including, GMC, insurance companies who have obtained your permission to share information about you, for the purpose of allowing you to carry out treatments.

## Data Storage

Laser Education Limited shall ensure that the following measures are taken with respect to the storage of personal data:

- a) All electronic copies of personal data should be stored securely using passwords and data encryption;
- b) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- c) All personal data stored electronically should be backed up at the end of each working day, with backups stored in secure drive (or drop box) and on a weekly basis stored on a secure medium. All backups should be encrypted which are compressed in a zip file and are password protected.
- d) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to our company or otherwise without the formal written approval of the Management Team and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary.
- e) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of Laser Education Limited where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to Laser Education Limited that all suitable technical and organisational measures have been taken);

## **Data Retention**

We will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. Where we have obtained your consent to process your personal and/or sensitive personal data, we will do so in line with our data retention policy. Upon expiry of that period we will seek further consent from you. Where consent is not granted we will cease to process your personal and/or sensitive personal data unless there is a legal basis for doing so.

#### **Consent, Complaints or Queries**

Where you have consented to us processing your personal data and/or sensitive personal data, you have the right to withdraw that consent at any time by contacting <u>admin@laser-ed.co.uk</u>

If you wish to complain about this privacy notice or any of the procedures set out within it please contact <u>admin@laser-ed.co.uk</u> in the first instance.

You also have the right to raise concerns with Information Commissioner's Office via <u>https://ico.org.uk/concerns/</u> or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

#### Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by email.

Use of Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit allaboutcookies.org.

### How do we use cookies?

We use cookies to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

## What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

• Functionality - Our Company uses these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

• Advertising - Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device and your IP address.

## How to manage cookies

You can set your browser not to accept cookies, and the website <u>allaboutcookies.org</u>. tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

#### Privacy policies of other websites

The Our Company website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

#### How to Contact Laser Education Limited

Please address any initial queries on data protection to admin@laser-ed.co.uk