

International Location Safety Ltd takes privacy and data protection very seriously. This privacy statement explains how ILS collects, stores and uses personal data when clients engage with our services. This policy will be kept under review and will be revised when required, notification of updates will be made on our website and all other marketing channels.

This privacy statement replaces the current Data Protection policy (August 2017) and is fully compliant with the General Data Protection Regulation (GDPR). The policy about personal data collection is written within the framework of the 6 data protection principles set out in the GDPR: 1. Lawfulness, fairness and transparency; 2. Purpose Limitation; 3. Data Minimisation; 4. Accuracy; 5. Storage Limitation; 6. Integrity and confidentiality.

## Definitions

When reading this statement, please note that the terms 'ILS', 'We', 'Us' and 'Our' refer to International Location Safety Ltd. The terms 'You', 'Your', 'Participant', 'Customer' and 'Client' refer to anyone who pays for and engages in the use of our services.

'Personal data' refers to any information that directly or indirectly identifies a person (a 'natural person' as defined by GDPR) including name, address, email, phone number, job title and employer information.

'Special category data' refers to sensitive personal data which in this policy only includes health data. In the GDPR, special category data refers to information concerning race, ethnic origin, religion, politics, trade union membership, genetics, biometrics, health and sexual orientation. We only collect some health data as it is the only category that is relevant to our SAFA training.

The use of the term '*Data Controller*' in this policy refers to International Location Safety. The term '*Data Processor*' refers only to the services we use for payment processing, email campaign software, IT service providers, online survey software services and accommodation providers.

'SAFA' refers to our Security Awareness & First Aid training; this is a 3-day residential course which involves some mild physical activity. 'TSS' refers to our Travel Safety & Security courses; this is a 1-day classroom-based course. 'Risk Advisory Services' refers to all bespoke project work,

consultancy and support services to our clients; these are delivered independent of our training courses.

## Your Personal Data

When enrolling on our residential SAFA training courses, you are asked to voluntarily provide only the personal data that is necessary to ensure a successful learning outcome and safe training experience. The TSS course requires much less personal data to be provided. When engaged with our Risk Advisory Services, we only collect the contact details needed to ensure efficient communication with the client and the smooth delivery of the project work.

### What data do we collect?

On our SAFA course, the data collected on our booking and registration forms includes: name, email address, job title, employer, invoicing contact details, next of kin or emergency contact details and medical insurance details. For our TSS course, the only personal data collected is a name, job title and employer. Participants are invited to opt-in to our email mailing list. All course feedback that we collect is anonymised after the statistics and comments have been collated. The personal data collected for our Risk Advisory Services include names, email addresses, skype names, telephone numbers, job titles and invoicing contact details of the key contact people within the client's organisation. Risk Advisory projects may involve requests for key contact people to voluntarily provide contact details for interviewees who will be requested to provide insights into the client's security culture. These details may include: name, email address, skype name, telephone number and job title. The feedback from the interview will be anonymised and the contact details deleted after the project is complete.

### Special category data

The only special category that we ask you to provide is within the health category and this is only collected for our SAFA course participants. Some examples of the information that we need are: pre-existing conditions, heart problems, mobility issues, dietary requirements, allergies, pregnancy or any emergency medication etc. We do not collect or require any other special category data as defined by the GDPR.

### Why do we collect it?

- **Name:** We collect your name for identification purposes during trainings and for booking accommodation at our training venues.

- **Email address:** We ask for your email address in order to provide you with course agendas, joining instructions and any information about changes to course dates, venues or cancellations. Participants are invited to opt-in to our mailing list should they wish to. You will not be automatically enrolled on the list. This mailing list is used for keeping clients updated with company news, details of new services, upcoming courses and special offers.
- **Job title and Employer:** The information provided about job title and employer is used to provide our trainers with a general impression of the professional background, experience and knowledge of participants, thus being able to tailor the course and make the training relevant.
- **Invoicing contact details:** In order to process fees for our services, we require the contact details of any person responsible for the payment of invoices on behalf of our participants. The details required are a contact name, email and billing address.
- **Emergency contact and medical insurance details:** Due to the practical outdoor component of the SAFA training, we require a next of kin contact in case of emergency as well as any medical insurance details that may be relevant. This is part of our duty of care and health & safety obligations.
- **Health details (Special Category Data):** The SAFA course involves mild physical exertion, exposure to outdoor elements and practical exercises that may place you in mildly stressful conditions. The information provided allows ILS to account for any personal circumstances that need to be considered to ensure participants health and wellbeing.

## Who do we share it with?

ILS uses a small number of carefully selected third parties to help provide our services to you. These act as 'Data Processors' as defined by the GDPR. Examples of the services we use are payment processing, email campaign software, IT service providers, online survey software services and accommodation providers. In choosing to work with any such Data Processors, we will always ensure that the security policies and confidentiality arrangements and GDPR compliance of those third parties adhere to the same requirements. No ownership rights to the data will be transferred to any third party.

The data that we collect from you will not generally be transferred outside the European Economic Area ("EEA"). The only circumstance where this may occur is for training courses outside the EEA when we

give accommodation providers your name, for booking purposes only. By submitting your data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## Data Retention

ILS endeavours to minimise the retention as much as reasonably possible. In line with this principle the different circumstances under which we retain some personal data are as follows:

- SAFA course participants: we retain the name and employer of the graduates alongside the course date to determine who has attended our courses. The SAFA certificate is valid for a period of 3 years and we reserve the right to check the validity of our SAFA certificates. Paper registration forms are only retained for this 3-year period where a serious pre-existing medical condition has been registered; this is for legal and insurance purposes. All other paper registration forms are shredded after feedback has been collated. All feedback is then anonymised. Email addresses are only retained where participants have explicitly opted in to the mailing list on their registration form.
- TSS Course participants: we do not retain any participants' personal data.
- Risk Advisory interviewees personal data is deleted after survey data has been collated.

## Security

All reasonable steps have been taken to ensure the security of your personal data through the minimalization of collection, IT security measures and best practice in handling data both digitally, and on paper. Our IT system meets GDPR requirements, including Hard drive encryption, remote wipe functions and the most up to date security software. This is all done in conjunction with our IT partners.

## Access

If you would like to get in touch with us regarding any of your personal data access rights, please email us: [data@locationsafety.com](mailto:data@locationsafety.com).  
Or alternatively, use the address and phone number provided below:

# Privacy Policy

May 2018

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