



# Trainee Privacy Statement



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## 1. Introduction

### About LBSPartners

#### Our Purpose

To inspire and empower people and organisations to achieve sustained excellence

#### Our Mission

As a business consultancy with unrivalled Lean experience, we combine training and mentoring to inspire and empower both individuals and organisations to continuously improve their performance and achieve sustained excellence and ongoing cost savings.

#### Our Training

We ask you to complete the Attendance sheet where you will share certain personal data. You will also be asked to complete a Feedback Form when you complete your training with us. The data you provide is invaluable to our continued efforts to provide a wide range of relevant and desirable training programmes, to communicate with you, and to enable us to operate effectively.

You may wish to review this Privacy Statement before completing the Attendance sheet and Feedback Forms to understand how we use your data.

### About this Privacy Statement

- LBSPartners needs to collect and use data to provide programmes and to operate our business, to improve our services and personalise your experiences.
- This Privacy Statement relates to our privacy practices and policies in place for the data we collect in the Attendance sheet and Feedback Form. It sets out what personal data we collect and process about you in connection with the services and functions of LBSPartners through our training programmes; where we obtain the data from; what we do with that data; how we comply with the data protection rules, who we transfer data to and how we deal with individuals' rights in relation to their personal data. Any personal data is collected and processed in accordance with Irish and EU data protection laws.

- All our employees are required to comply with this Privacy Statement when they process personal data on our behalf. Any failure by LBSPartners employees to comply with the data protection rules (including as they are outlined in this Privacy Statement) may result in disciplinary action or sanction.
- Please note that we may disclose individuals' information to trusted third parties for the purposes set out and explained in this document. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish and EU laws on data protection.

## 2. Data Controller

- Data protection provides rights to individuals with regard to the use of their personal information (personal data) by organisations, including LBSPartners. Irish and EU laws on data protection govern all activities we engage in with regard to our collection, storage, handling, disclosure and other uses of personal data.
- Compliance with the data protection rules is a legal obligation. In addition, our compliance with the data protection rules helps individuals to have confidence in dealing with us and helps us to maintain a positive reputation in relation to how we handle personal information.
- As and from 25 May 2018, the applicable rules are contained in the EU General Data Protection Regulation (EU Regulation 679/2016) (the "GDPR") and in related Irish data protection legislation which gives effect to the GDPR.
- "Data controllers" are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed, who/which make independent decisions in relation to the personal data and/or who/which otherwise control that personal data.
- For the purposes of the GDPR, LBSPartners is the data controller with regard to the personal data described in this Privacy Statement.

### 3. What personal data does LBSPartners collect and why?

- “Personal data” means any information relating to an identified or identifiable natural person. Personal data can be factual (for example, a name, address or age range) or it can be an opinion about that person, their actions and behaviour.
- We set out in the Data Processing Table 1 of this policy a description of the personal data that we collect in connection with our services and functions, why we are collecting this data, our legal basis for processing this data and the length of time for which we retain your data.
- We process the personal data for the purposes set out in our Data Processing Table and for any other purposes specifically permitted by or as required by law.
- We collect this information from you through our Attendance sheet and Feedback Form which will be completed in hard copy then processed into soft copies by an LBSPartners employee.

### 4. Consent

- By consenting to our processing your personal data in line with this Privacy Statement in the Attendance sheet and Feedback Form you are giving us permission to process your personal data specifically for the purposes identified.
- You may withdraw consent at any time by providing an unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify withdrawal of consent to the processing of personal data relating to you. If you have any queries relating to withdrawing your consent, please contact the [info@lbspartners.ie](mailto:info@lbspartners.ie)
- Withdrawal of consent shall be without effect to the lawfulness of processing based on consent before its withdrawal.

### 5. What are the data protection principles?

- The eight data protection principles apply to our organisation:
  1. We process personal data fairly, lawfully and transparently. This obligation is inclusive of the fact that we have a valid legal basis for our processing of personal data (whether the consent of the person, or that the processing is necessary for our legitimate interests (as long as these interests do not

outweigh the rights of data subjects) or some other legal basis set out under the DPAs or (when applicable) the GDPR). We are transparent with individuals about our processing of their personal data.

2. We only collect personal data for specified, identified and legitimate purposes.
3. We only process the personal data that we have collected for the purposes which we have identified or for purposes that are compatible with the purposes that we have identified.
4. The personal data that we collect and process must be adequate, relevant and limited to what is necessary for the purposes.
5. The personal data that we collect and process must be accurate and (where necessary) kept up to-date.
6. We do not keep personal data any longer than is necessary, bearing the purpose for which we collected it. This includes that we keep personal data in a form which permits identification of the data subject for no longer than is necessary.
7. We keep personal data safe and secure from unauthorised access, deletion, disclosure or other unauthorised uses. This includes not just keeping data safe and secure from persons outside our organisation, but also from people within our organisation who have no need to access or use the personal data. We are also careful when transferring personal data outside the European Economic Area (“EEA”, being the EU plus Norway, Liechtenstein and Iceland), and make sure that we have a valid legal basis on which to transfer that data. Transfer can include using a cloud server that is located outside the EU or allowing people who are located outside the EEA access to personal data that is stored within the EEA.
8. We comply with data subjects’ rights of information about, and (separately) access to, their personal data and with their other data protection rights, including rights to correct or erase their personal data, rights “to be forgotten”, rights to object to processing (including profiling), rights against automated decision-making and (under the GDPR) rights to data portability.

## 6. Security of your personal data

- We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
- We have procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be

transferred to a data processor if they agree to comply with those procedures and policies, or if s/he puts in place adequate measures himself. In addition, we have appropriate written agreements in place with all of our data processors.

- We maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:
  1. **Confidentially** means that only people who are authorised to use the data can access it.
  2. **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
  3. **Availability** means that authorised users should be able to access the data if they need it for authorised purposes.
- We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is transferred to an application which is protected using SSL (Secure Sockets Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

## 7. Will we share your information with anyone else?

- Your personal data may also be shared with LBSPartners third parties for the purposes outlined in Table 1.
- We may pass your details to another agency but only if it is required by law, pursuant to our statutory functions, or if that agency is relevant to your enquiry.

## 8. Your data protection rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.



- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Object to automated decision-making** including a profile that is not to be the subject of any automated decision-making by LBSPartners using your personal information or profiling of you.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer of your personal information** in an electronic and structured form to you or any other party (commonly known as a right to ‘data portability’.) This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

## 9. Requests by data subjects to exercise

- Data subjects must make a formal request for personal data we hold about them or exercise their data protection rights to make an access request through contacting [info@lbspartners.ie](mailto:info@lbspartners.ie)
- Note also that data subjects have the right to make a complaint at any time to a data protection supervisory authority in relation to any issues related to our processing of their personal data. As our organisation is located in Ireland and we conduct our data processing here, we are regulated for data protection purposes by the Irish Data Protection Commissioner. You can also contact the Data Protection Commissioner as follows:
  - Go to their website [www.dataprotection.ie](http://www.dataprotection.ie)
  - Phone on +353 57 8684800 or +353 (0)761 104 800
  - Email [info@dataprotection.ie](mailto:info@dataprotection.ie)



- Address: Data Protection Office - Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23. Or 21 Fitzwilliam Square Dublin 2. D02 RD28 Ireland.

## 10. Changes to the Privacy Statement

Our Privacy Statement may change from time to time. Upon these occasions this document will be updated and available to all trainees on at LBSPartners drive.

## 11. Table 1 Data Processing Activities and Retention

What personal data we take	Purposes of processing	Basis for processing	Retention period
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First name and surname	<p>To contact you about training programmes you have registered for</p> <p>To contact you following completion of your training programme to evaluate the quality and impact of that training</p> <p>To enable LBSPartners to conduct risk assurance activities</p>	Consent	No longer than 6 years following the completion of your training programme
Contact details (phone number and email address)	<p>To contact you about training programmes you have registered for</p> <p>To contact you following completion of your training programme to evaluate the quality and impact of that training</p> <p>To enable LBSPartners to conduct risk assurance activities</p> <p>Provided to the University of Limerick upon request for certification</p>	Consent	No longer than 6 years following the completion of your training programme
Photos	Graduation photos for marketing purposes	Consent	No longer than 6 years following the completion of your training programme
Employment status and details relating to this	<p>For statistical reporting to the department of education and skills or the University of Limerick</p> <p>For aggregated and statistical reporting in</p>	Consent	No longer than 6 years following the completion of your training programme