



# Privacy Notice

## Summary

### Types of personal data we collect



Contact details



Website visitor's computer details



Correspondence



Formal identification documents

### How we handle personal data



- We only process your data in the way you would reasonably expect us to.
- We use your data to provide our services to you, respond to your enquiries, manage our relationship with you, meet our legal obligations, and improve our website.
- We keep the information we hold about you to a minimum.



- Some data you give us may be kept indefinitely.
- So long as we don't need your data to meet regulatory requirements, you have a right to be forgotten upon request.



- Our website does include elements that track visitor activities so that we can improve it.
- We only use cookies that automatically expire at the end of your session on our website.

### Data sharing



- Your personal data is not given to advertisers.
- Your personal data is never sold.







- Data is given to law enforcement only when legal process is followed.



- Affiliates, subsidiaries, and contractors are bound by the same privacy practices.

## Justification for processing your data

Types of personal data	How and why we process that data	Legal basis
<ul style="list-style-type: none"> <li>Name</li> <li>Telephone</li> <li>E-mail address</li> <li>Postal address</li> <li>Records and contents of any email, written or telephone communications</li> </ul>	<p><b>How</b></p> <p>You may provide information about yourself by completing paper forms; You may initiate dialogue with us by telephone, email or otherwise. When you call our office, we may collect Calling Line Identification (CLI) information or ask you for a telephone number to call back on.</p> <p><b>Why</b></p> <p>To correspond with you. To perform our obligations arising from any contracts between you and us and to provide you with any information, products and services that you have requested from us. To notify you about changes to our products or services.</p>	 <p>Contracted services, Our legitimate interests</p>
<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> </ul>	<p><b>How</b></p> <p>Contact details provided when attending one of our courses, or those that are in the public domain</p> <p><b>Why</b></p> <p>To inform you about upcoming courses, updates to our business, or industry news; To send you our newsletter. Each time you hear from us in a marketing context you will be given the opportunity to manage your subscription and opt-out of future communications.</p>	 <p>Our legitimate interests</p>
<ul style="list-style-type: none"> <li>Government identification documents and permits</li> </ul>	<p><b>How</b></p> <p>We may ask you to provide additional information that we use to help meet regulatory requirements; We may ask to take copies of your ID documents and provide proof of your eligibility to study or work.</p> <p><b>Why</b></p> <p>Verification of identity; Preventing unauthorised individuals from accessing, modifying or otherwise interfering with the integrity of the personal data we hold; Managing risk exposure and liabilities.</p>	 <p>Our legitimate interests, Our legal obligations</p>
<ul style="list-style-type: none"> <li>CV and employment history</li> </ul>	<p><b>How</b></p> <p>You may choose to send us your CV regarding any vacancies</p> <p><b>Why</b></p> <p>Evaluating and processing job applications; Contacting you regarding potential employment opportunities.</p>	 <p>Our legitimate interests</p>

- **IP address**
- **Browser type**
- **Operating system**
- **Session cookies**

**How**

When you visit our website, we automatically collect information about your device, including your IP address and how you engaged with our website during that session. We use Google Analytics to provide insight about our website visitors.

**Why**

To improve our website.



Our legitimate interests

## Sharing and disclosure of your data

We may pass your personal data to third parties who are service providers, agents and sub-contractors to us for the purposes of running our office IT systems, processing payments, and providing services to you on our behalf. We only disclose the specific data that is necessary for the third party to deliver the service, and we require them to keep your information secure and not to use it for their own purposes.

We may share data to authorities where disclosure is required by any Jersey law or regulation, where we suspect a criminal offence may have been committed, to protect our rights, property, or the safety of others.

## Protecting your data

The data that we collect from you will only be transferred and stored at locations which have adequate protection, including the Channel Islands, European Economic Area (EEA), or with USA-based service providers who comply with Privacy Shield. We will not transfer your personal data outside these places without your consent.

We will take all steps necessary to ensure that your data is treated securely and in accordance with this privacy policy. We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, or unauthorised alteration or destruction.

We will notify you promptly if we become aware of any breach of your personal data which might expose you to serious risk.

## How long we store your data for

We will hold your personal data on our systems for as long as you are actively engaged with us as a student, client, prospective client, employee or associate, and for as long afterwards as is necessary to comply with our legal obligations.

You may request an inventory of data we hold on you, and you may request for it to be removed so long as we are not legally obliged to keep it.

We securely destroy all personal and financial data once it has expired. Paper records are shredded.

When digital records are erased, an offline archive may continue to exist within our data backup library. It is our policy not to restore any individual's data for which the so called "right to be forgotten" has been exercised.

## Your rights

We promise to uphold the rights provided to you as an individual under EU GDPR and the Data Protection (Jersey) Law 2018.

For more information about your rights please visit the websites of the (Jersey) [Office of the Information Commissioner](#) or (UK) [Information Commissioner's Office](#).

## Website and Email Disclaimer

Email communications may be private and confidential, or contain privileged information, and are intended only for the use of the individual or entity who are described in the message headers and/or body. Access to the information by anyone else is unauthorised. If you are not the intended recipient (a) you are requested to [inform us](#) immediately by return e-mail and to irretrievably erase all copies of the information from your computer systems (b) you should not disclose the information to any other person (d) any dissemination, distribution or copying of the information is strictly prohibited and (e) you should not take or refrain to take any action in reliance upon the information. All attachments are scanned to remove viruses; however, we accept no responsibility for these attachments once they have left our computer network.

There is no guarantee that any email you send will be received by us, or that the confidentiality of that email will be maintained during internet transmission.

We cannot accept responsibility (to the extent permitted by law) for any loss arising directly or indirectly from the use of, or any action taken in reliance on, any information appearing on this website or any other website to which it may be linked. We make no warranty that this website is free from errors, inaccuracies, defects or viruses.

## Contacting us

You must ensure that any information you provide to us is correct and complete. You can ask us to rectify or update your information at any time, though we may ask for proof of identity.

All enquiries related to this notice are to be directed as follows:

**Email:** [data@cpdfirst.com](mailto:data@cpdfirst.com)

**Telephone:** +44 (0)1534 880240

**In writing:** Claremont, Le Rue Du Cap Verd, St Lawrence Jersey, Channel Islands, UK, JE3 1EL