

# JWWC Training – Privacy policy

## Introduction

Please read this privacy policy when booking a training course with Judd Water & Wastewater Consultants ('we', 'us', 'our'). You should read this document in conjunction with our training terms and conditions document and keep a copy for future reference.

This privacy policy applies to face-to-face (in person) as well as digital (online) training courses delivered by Judd Water & Wastewater Consultants. You are referred to our privacy policy if you wish to visit our website (<https://www.juddwater.com/terms/privacy-and-cookies/>).

<b>1. Date of last revision</b>	29 January 2021
<b>2. About us</b>	<p>Judd Water &amp; Wastewater Consultants is a trading division of Judd and Judd Ltd, a limited company providing wastewater consultancy and training. We are registered in England and Wales under registration number 8082403, and our registered office is Suite 2, Douglas House, 32–34 Simpson Road, Fenny Stratford, Buckinghamshire, MK1 1BA, United Kingdom.</p> <p>You may contact us by emailing <a href="mailto:enquiries@juddwater.com">enquiries@juddwater.com</a>.</p> <p>This policy applies where we are acting as a data controller with respect to the personal data of our training service users.</p>
<b>3. Personal information we collect</b>	<p>We currently collect and process the following information in connection with our training events:</p> <ul style="list-style-type: none"> <li>• Personal identifiers, contacts and characteristics (for example, name and contact details)</li> <li>• Customer financial information.</li> </ul>
<b>4. How we get your personal information and why we have it</b>	<p>Most of the personal information we process is provided to us directly by you for one or more of the following reasons:</p> <ul style="list-style-type: none"> <li>• answering your enquiry</li> <li>• processing your booking</li> <li>• processing your payment</li> </ul>

- delivering your training, and
- for accounting purposes.

We collect this information from you:

- from email correspondence between us
- verbally, via telephone or web conference
- via LinkedIn.com, for example in response to our training event promotions
- if you completed our online enquiry forms
- if you were booked on to a training event by an associate of yours
- during delivery of our training services
- in the course of paying us for our services.

In order to provide our services, we share this information with:

- Microsoft Office 365 (including Outlook, OneDrive and Teams) – for email, backup of our systems and data for administration and accounting purposes, and delivering training:  
<https://privacy.microsoft.com/en-gb/privacystatement>
- Amasci Creative Ltd (web design and hosting) – for hosting our website and online forms:  
<http://www.amasci.co.uk/>
- PayPal – for payment processing:  
[Privacy Statement for PayPal Services](#)
- HSBC – for payment processing:  
<https://www.hsbc.co.uk/1/2/privacy-notice>

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Where our training events are delivered by the MS Teams platform, you acknowledge that your identity will be disclosed to other event delegates who may be from third-party organisations. This is beyond our control. If this is of concern to you, you should not book

	a training event with us.
5. GDPR	<p>Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing your information are as follows:</p> <ul style="list-style-type: none"> <li>(i) We may process information contained in any enquiry you submit to us regarding training services ("<b>enquiry data</b>"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant training services to you. The legal basis for this processing is our legitimate interests.</li> <li>(ii) We may process information relating to transactions, including purchases of training services, that you enter into with us and/or through our website ("<b>transaction data</b>"). The transaction data may include your contact details, including your address, and the transaction details. The transaction data may be processed for the purpose of supplying the training services, invoicing and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our business.</li> <li>(iii) We may process information contained in or relating to any communication that you send to us ("<b>correspondence data</b>"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with users.</li> <li>(iv) We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion</li> </ul>

	<p>of our legal rights, your legal rights and the legal rights of others.</p> <p>(v) We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.</p> <p>(vi) In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.</p> <p>(vii) Please do not supply any other person's personal data to us unless we prompt you to do so.</p>
<p><b>6. Storing your personal information</b></p>	<p>Your information is securely stored on MS Office365 OneDrive cloud storage, password protected and accessible only by the directors of the company.</p> <p>Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</p> <p><b>Enquiry data</b> will be retained for a minimum period of 12 months following the initial enquiry (if no subsequent correspondence received) and for a maximum period of 24 months following this initial enquiry (if no subsequent correspondence received). We dispose of your personal information by deleting your details from our systems and cloud storage.</p> <p><b>Transaction data</b> will be retained for a minimum period of 7 years following the transaction date and for a maximum period of 8 years following the transaction date. This is for accounting purposes. We dispose of your personal information by deleting your details from our systems and cloud storage, and shredding paper copies of invoices.</p> <p><b>Correspondence data</b> will be retained for a minimum period of 1 year following the date of the last contact, and for a maximum</p>

	<p>period of 2 years following the date of the last contact. We dispose of your personal information by deleting your details from our systems and cloud storage.</p> <p>In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will keep your data for no longer than is necessary.</p> <p>Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.</p>
<p><b>7. Your data protection rights ('legitimate interests' data)</b></p>	<p>Under data protection law, you have rights including:</p> <p><b>Your right of access</b> – You have the right to ask us for copies of your personal information.</p> <p><b>Your right to rectification</b> – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.</p> <p><b>Your right to data portability</b> – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.</p> <p>You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.</p> <p>Please contact us at <a href="mailto:enquiries@juddwater.com">enquiries@juddwater.com</a> if you wish to make a request.</p>
<p><b>8. How to complain</b></p>	<p>If you have any concerns about our use of your personal information, you can make a complaint to us at <a href="mailto:enquiries@juddwater.com">enquiries@juddwater.com</a>.</p> <p>You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Helpline number: 0303 123 1113 ICO website: <a href="https://www.ico.org.uk">https://www.ico.org.uk</a></p>