



At Fairway Training we take privacy and data protection very seriously. We've updated our privacy policy (**Policy**) to ensure that we communicate to you, in the clearest way possible, how we treat personal information. We encourage you to read this Policy carefully. It will help you make informed decisions about sharing either your own personal information with us or if you contract with us for any of our services (**Services**), the personal details of employees within your organisation. Before sharing the personal details of employees within your organisation you must ensure that you have the correct processes and authorisation in place to do so.

The defined terms in this Policy have the same meaning as in our Terms and Conditions of Use, which you should read together with this Policy. By accessing the Fairway Training website and using our **Services**, you consent to the terms of this Policy and agree to be bound by it and Our Terms of Use.

For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is Fairway Training Ltd, Prospect House, Fishing Line Road, Redditch, Worcs, B97 6EW, United Kingdom (**Fairway Training**).

### **Fairway Training collects your personal information**

Fairway Training is a provider of the following **Services**

- Payroll and NHS Pension Administration services.
- NHS Pension Support Service
- Consultancy
- NHS Pension Scheme Training

The **Services** involve the storage of Data about you, the organisation and dependent upon which **Services** are used, employees of the organisation. That Data can include personal information. Personal information is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number, taxation details, and financial information.

Fairway Training may collect personal information directly from you when you:

- Register to use the **Services**,
- Use any of the Services provided,
- Contact Fairway Training either by
  - ◊ Telephone
  - ◊ Email
  - ◊ Fax
  - ◊ Social Media
- Visit the Fairway Training website.

You can always choose not to provide personal information to Fairway Training, but it may mean that we are unable to provide you with any or all the **Services**.

### **Fairway Training may receive personal information from you about others**

Through your use of the **Services**, Fairway Training may also collect information from you about someone else (e.g. employees within your organisation). If you provide Fairway Training with personal information about someone else, you must ensure that you are authorised to disclose that information to Fairway Training and that, without Fairway Training taking any further steps required by applicable data protection or privacy laws, Fairway Training may collect, use and disclose such information for the purposes described in this Policy.

Before sharing the personal details of employees within your organisation you must ensure that you have the correct processes and authorisation in place to do so.

This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, and Fairway Training's identity. For the purposes of processing the data of information you provide to us about someone else, Fairway Training is the data processor rather than the data controller.

Where requested to do so by Fairway Training, you must also assist Fairway Training with any requests by the individual to access or update the personal information you have collected from them and entered into the Services.

### **Fairway Training collects, holds, and uses personal information for limited purposes**

Fairway Training collects personal information so that we can provide your organisation with the **Service** and any related **Services** you may request. In doing so, Fairway Training may use the personal information we have collected from you for purposes related to the Services including to:

- verify you or an employee of the organisations identity,

- administer the Services, in particular Payroll and NHS Pension Administration
- notify you of new or changed services offered in relation to the Service,
- carry out marketing or training relating to the Service,
- assist with the resolution of technical support issues or other issues relating to the Service,
- comply with laws and regulations in applicable jurisdictions, and
- communicate with you.

By using the **Services**, you consent to personal information being collected, held and used in this way and for any other use you authorise. Fairway Training will only use personal information for the purposes described in this Policy with your express permission.

It is your responsibility to keep your any user names and passwords to the **Service** safe. You should notify us as soon as possible if you become aware of any misuse of your password, and immediately change your password within the Service or via the “Forgotten your password” process.

#### **Fairway Training can aggregate your non-personally identifiable data**

By using the Service, you agree that Fairway Training can access, aggregate and use non-personally identifiable data Fairway Training has collected from you. This data will in no way identify you or any other individual.

Fairway Training may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Service,
- provide our customers with further information regarding the uses and benefits of the Service,
- Otherwise to improve the Service.

#### **Fairway Training holds personal information on servers located in the United Kingdom**

All Data, including personal and non-personal information, that is entered into the Service by you, or automatically imported on your instruction, is transferred to Fairway Training’s servers as a function of transmission across the Internet. By using the Service, You consent to your personal information or that of your organisations employees being transferred to our servers as set out in this Policy.

By providing personal information to Fairway Training, you consent to Fairway Training storing personal information on servers hosted in the United Kingdom. The server host’s role is limited to providing a hosting and storage service to Fairway Training, and we’ve taken steps to ensure that our server hosts only have access to the aforementioned data with the express written permission of Fairway Training, and this is further limited to providing IT support resolutions only. Any unauthorised accessing of the data by the server hosts will be a breach of contract and classed as a data breach.

The Data that Fairway Training collects from you may be transferred to, and stored at, a destination inside the European Economic Area (**EEA**). It may also be processed by staff operating inside the EEA who work for Fairway Training or for one of our suppliers. Such staff maybe engaged in, among other things, the processing of payroll services, payslip production and the provision of support services. By submitting the Data, you agree to this transfer, storing or processing. Fairway Training will take all steps reasonably necessary to ensure that the Data is treat-

ed securely and in accordance with this privacy policy.

### **Fairway Training takes steps to protect personal information**

Fairway Training is committed to protecting the security of personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure. Your personal information is stored on secure servers that have SSL Certificates issued by leading certificate authorities and all Data transferred between you and the **Service** is encrypted.

However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information to the **Service** within a secure environment.

We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner.

### **Fairway Training only discloses Personal Information in limited circumstances**

Fairway Training will only disclose the personal information you have provided to us to entities outside Fairway Training if it is necessary and appropriate to facilitate the purpose for which the personal information was collected pursuant to this Policy, including the provision of the **Service**.

Fairway Training will not otherwise disclose your personal information to any third party unless you have provided your express consent. However, you should be aware that Fairway Training may be required to disclose personal information without your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by HMRC, NHS Pensions etc. if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose any personal information.

The third parties who host our servers do not control, and are not permitted to access or use your personal information or that of your employees except for the limited purpose of storing the information.

### **You may request access to your personal information**

It is your responsibility to ensure that the personal information you provide to us is accurate, complete and up-to-date. The Act gives you the right to request access to the information we hold about you or employees of your organisation, or request that we update or correct any personal information we hold, by setting out your request in writing and sending it to us at [privacyrequest@fairwaytraining.com](mailto:privacyrequest@fairwaytraining.com)

Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. Fairway Training is the data processor in respect of the **Services** provided and requests by employees of your organisation need to be made to the Data Controller (Your organisation)

Fairway Training will process your request as soon as reasonably practicable, provided we are not otherwise prevented from doing so on legal grounds. If we are unable to meet your request, we will let you know why. For example, it may be necessary for us to deny your request if it would have an unreasonable impact on the privacy or affairs of other individuals, or if it is not reasonable and practicable for us to process your request in the manner you have requested. In some circumstances, it may be necessary for us to seek to arrange access to your personal information through a mutually agreed intermediary.

We will only keep your personal information for as long as we require it for the purposes of providing you with the Service. However, we may also be required to keep some of your personal information for specified periods of time, for example under certain laws relating to HMRC regulations, NHS Pensions, money laundering, and financial reporting legislation.

The Fairway Training website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Fairway Training uses cookies**

In providing the Service, Fairway Training utilises "cookies". A cookie is a small text file that is stored on your computer for record-keeping purposes. A cookie does not identify you personally or contain any other information about you but it does identify your computer.

We and some of our affiliates and third-party service providers may use a combination of "persistent cookies" (cookies that remain on Your hard drive for an extended period of time) and "session ID cookies" (cookies that expire when You close Your browser) on the Website to, for example, track overall site usage, and track and report on Your use and interaction with ad impressions and ad services.

You can set your browser to notify you when you receive a cookie so that you will have an opportunity to either accept or reject it in each instance. However, you should note that refusing cookies may have a negative impact on the functionality and usability of the Website.

We do not respond to or honour "Do Not Track" requests at this time.

### **You can opt-out of any email communications**

Fairway Training sends invoicing information, product information, Service updates and Service notifications to you via email. Our emails will contain clear and obvious instructions describing how you can choose to be removed from any mailing list not essential to the Service. Fairway Training will remove you at your request.

## **You are responsible for transfer of your data to third-party applications**

The **Service** may allow you, the subscriber, or another Invited user within the relevant subscription to the **Service** to transfer Data, including personal information, electronically to and from third-party applications. Fairway Training has no control over, and takes no responsibility for, the privacy practices or content of these applications. You are responsible for checking the privacy policy of any such applications so that you can be informed of how they will handle personal information.

## **Fairway Training has a privacy complaints process**

If you wish to complain about how we have handled your personal information or that of employees within your organisation for providing Services, please provide our privacy officer with full details of your complaint and any supporting documentation:

- by e-mail at [privacy@FairwayTraining.com](mailto:privacy@FairwayTraining.com), or
- by letter to The Privacy Officer, Fairway Training Limited, Prospect House, Fishing Line Road, Redditch, Worcs, B97 6EW

Our privacy officer will endeavour to:

- provide an initial response to Your query or complaint within 10 business days, and
- Investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our privacy officer.

## **This policy may be updated from time to time**

Fairway Training reserves the right to change this Policy at any time, and any amended Policy is effective upon posting to this Website. Fairway Training will make every effort to communicate any significant changes to you via email or notification via the Service. Your continued use of the Service will be deemed acceptance of any amended Policy.