

Privacy Notice - Training Solutions

We understand that your privacy is important to you and, in our capacity as data controllers, we are committed to protecting and respecting it.

This document sets out how we keep your personal data safe, and describes your rights, in accordance with local data protection laws adopted both in the EU as the General Data Protection Regulation (GDPR) and the UK as the UK GDPR and Data Protection Act 2018. Throughout this notice, the term GDPR is used to represent both EU and UK data protection regulations.

Resource International Group Investments AG (RIGI) is the ultimate holding company of the Resource Group of companies, operating as:

Contractair Ltd (trading as Flight Crew Services), providing clients with flight deck or cabin crew on a permanent or contract basis.

Resource Consulting Ltd, Resource Consulting AG, Resource Consulting Spain, Resource Consulting GmbH (collectively trading as Aviation Resourcing Services), which provides skilled manpower across line & base maintenance, aircraft production, interiors, maintenance & completions, and business aviation on both a temporary and permanent basis.

LRTT Ltd (trading as Resource Training Solutions), which provides regulatory approved training services and products to aviation and its allied industries, through both classroom based and online provision. This Privacy Statement sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read it carefully to understand our views and practices regarding your personal data and how we will treat it.

It is important to point out that we may amend this Privacy Notice from time to time. Please visit our website if you want to stay up to date as we will post any changes there.

The territorial scope of the regulation covers data subjects in both the member states the European Economic Area as well as the United Kingdom whether the controller/processor is located within this geographic scope or where member state law applies by virtue of public international law.

If you have any questions, or want more details about how we use your personal information, you can contact us at data@resourcegroup.co.uk

The term Training Services is used throughout this document and refers to Resource Training Solutions (RTS), who provide Approved Training, Examination and Certification which is regulated by law. It also provides online training and practical workshop training to individuals and clients.

The Type of Data We Collect

From learners

In order for us to provide a full range of training services including examination and certification in line with the aviation and aerospace industry regulator's requirements. We need to process certain information about you. We collect data which allow us to place you on course(s) and receive examination and certification in line with the requirements of the regulatory authorities. This data will include your name, address, Telephone number, email address, date of Birth, Place of Birth, a copy of either your Passport/ Driving Licence or other formal identification document, relevant educational qualifications.

We may also use this data to email details of our training courses which we believe are relevant to the industrial sector you work within.

In order for us to process payments for our services, we may require payment card details, although we may take these for phone bookings, we will destroy the card details as soon as the payment has been taken.

From clients

If you are a client of ours, we need to collect and use information about you, or individuals at your organisation, in the course of providing you with services such as: sponsoring training to your staff. This is may either be through attending courses or online training services. In these circumstances we will correspond with you regarding details of the staff being sponsored. We will also require an address to send documentation relating to successful course completion.

We may from time to time contact you to request feedback on the quality of training services we have provided and may discuss any future training courses that we feel may be of interest to your organisation.

From suppliers

We will collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We will also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us.

From website users

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

How we collect your Data

Learner data

We collect data applicants who wish to use our training services in three primary ways:

1. Personal data you give to us, which may include:
 - Entering your details on our website or via an application form, as part of the registration process.
 - When you email us a course booking form.
 - When you contact us via phone, we may record your details on a course booking form.
 - When you first attend one of our training courses, we may require a copy of your passport for our training records.
2. Personal data we receive from other sources:
 - Your employer may provide data about you if they are sponsoring your training.
 - Your employer may provide data about you if they are booking a training course on your behalf.
 - Your colleagues may occasionally provide us with data that will allow us to provide you with information about our training products. (We assume that this is at your request)
3. Personal data we collect automatically:
 - When you access our website, we collect your data automatically via cookies, in line with cookie settings in your browser. (Please see the section on how we use your personal data.)

Clients

We collect client personal data in three ways:

1. Personal data we receive directly from you:
 - Where you contact us, usually by phone or email.
 - Where we contact you by either phone or email as part of a business development activity.
2. Personal data we receive from other sources:
 - By analysing your online media presence.
 - From third parties such as candidates.
3. Personal data we collect via our website:
 - We may collect data about the extent to which you access our website.

Suppliers

During the course of our business with you we may ask for details from you relating to contact and payment.

Website users

IP addresses and cookies

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by most websites and do not harm your system. They can do a number of things, such as, remembering your preferences and personal information so you don't have to provide it again.

We use cookies to ensure that we give you the best experience on our website by personalising content and remembering your preferences. For more detail about how we use your cookies, please see our cookies policy which is available on the website.

How we use your personal data

General

Some personal data we collect from you is required to enable us to fulfil our contractual obligations to you or to others. Where appropriate, some data are required by statute or other laws. Other items may simply be needed to ensure that our relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

Learner data

The main reason for using your personal data is to maintain an accurate record of your details for the purposes of examination and certification. In certain circumstances this is a regulatory requirement.

We have listed below various ways in which we may use and process your personal data (sometimes it will be to comply with local laws). Please note that this list is not exhaustive:

- To compile documentation relating to course availability and ensure courses are not oversubscribed.
- Recording attendance on taught courses as mandated by the regulatory authorities, to provide evidence of attendance to employers and also in case of legal dispute.
- The provision of any relevant training material related to the course you are attending either in person or online.
- Compiling and discussing individual feedback from you and possibly your employer which support our course review and improvement strategies.
- Confirming the identity of candidates who are attending courses and associated exams.
- Producing online exams and confirming the identification of the candidate(s).
- Producing and distributing certificates to successful candidates.
- Processing and responding to individual complaints.
- To allow us to correctly invoice you.
- Carrying out our obligations arising from any contracts entered into between us.
- Carrying out our obligations arising from any contracts entered into between us and your employer/sponsor in relation to your training.
- Carrying out our obligations arising from any contracts entered into between us and third parties in relation to your training.
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

Marketing

We may periodically send you information that is relevant to your relationship with us. Additionally, we may wish to use your data for the purposes listed below:

- To enable us to develop and market other products and services.
- To market our full range of training services to you.
- To use testimonials from you on our website (but only where we have obtained your express consent to do so).

If you are not happy about any of these, you may opt out by writing to data@resourcegroup.co.uk

Legal Claims

Occasionally we may have to use your personal data to help us to establish, exercise or defend legal claims.

Client data

Training activities

We mainly use client data to assist us with recruiting activities and may:

- Store your details on our database so that we can contact you in relation to training activities.

- Keep records of our communications so that we can provide targeted services to you.
- Contact you to carry out customer satisfaction surveys.
- Process your data for targeted and appropriate marketing.

Marketing activities

We will not seek consent to send marketing literature to a corporate postal or email address. If you are not happy with this, you may opt out by writing to data@resourcegroup.co.uk.

Supplier data

We will only use data supplied by you to:

- Allow us to contact you in relation to our business agreements.
- To perform legal obligations.
- To perform checks, such as due diligence, should this be necessary.

How the Law Protects You

Your privacy is protected by law. This section explains how that works.

Data protection laws say that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Resource Group. The law says we must have one or more of the following reasons:

- To fulfil a contract we have with you.
- When it is our legal duty.
- When it is in our legitimate interest
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But, even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

In the following sections we will describe all the ways that we may use your personal information, and which of the reasons we rely on to do so, including our legitimate interests.

Legal Basis for processing data

General

Under Article 6 of the GDPR, the data you supply must be processed under one of six lawful bases:

- Consent to the processing of personal data for one or more specific purposes.
- Where necessary, for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.
- processing is necessary for compliance with a legal obligation to which the controller is subject.
- processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Legitimate interests

Learner data

We believe that to run our training course in an efficient manner and to ensure your place on any training course is reserved is in both our interests as a business and yours as a student. We also view legitimate interests as the lawful basis for administration of courses and for collection of feedback from both you and where appropriate, your employer/sponsor.

In order for us to continue as a business it is in our interests to also use data for invoicing and accounting purposes. This may also help you with your tax affairs.

When you attend a course either you or your employer/ sponsor enter into a contract with us, which is in our interests to administer to ensure that all parties abide by the content, we believe it is our legitimate interests to process this data to ensure both parties are adequately protected.

Clients

We believe that there are legitimate business interests to contact our clients about training activities, and keeping records of our meetings and communications where they are related to business training activities. Furthermore, we believe that it is customer surveys and appropriate targeted marketing are all legitimate interests on balance.

Suppliers

We believe that being able to contact you serves as legitimate business interests whether in relation to our business dealings, performance of legal obligation and performing checks such as due diligence.

Consent

Learner data

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by expressing an interest in or completing training activities with us), we consider that you would like us to send you information on other training-related services.. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other training courses to you alongside the specific one(s) you have already undertaken with us, for example annual mandatory training or other modules you will need attend and pass to achieve career progression. For other types of e-marketing, we are required to obtain your explicit consent.

If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time by writing to us at Data@resourcegroup.co.uk .

Legal obligation

Like all businesses, we have a legal duty to provide information relating to crime detection, tax collection or actual or anticipated litigation. In these circumstances we will process your information as a legal obligation. When you undertake approved training or examinations, we are required to process and retain all your training, examination and assessment records for an unlimited period.

Special categories of personal data

Sensitive personal data is data which is described in Article 9 of GDPR as that relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We will not collect sensitive data, unless required to do so by law.

However, you may voluntarily offer us information relating to yourself especially where you may be concerned that it may prejudice you if you do not supply such data.

Third parties disclosure

General

We employ external agencies to manage both our IT and Web services. Each of the businesses employed to manage our activities has made guarantees that your data will be securely processed in line with the General Data Protection Regulation.

Online learning is via a Learning Management System which is managed through a third party supplier who has made guarantees that your data will be securely processed in line with the General Data Protection Regulation.

Certificate generation for successful candidates is managed by a third party hosted solution which is provided through a third party supplier has made guarantees that your data will be securely processed in line with the General Data Protection Regulation.

On occasion we may be required to disclose information relating to your training when it has been requested by the National Aviation Authorities to whom you have made a licence application.

We use Worldpay to provide third party payment services, however they act as the data controller for any data collected relating to payment for our services. You need to talk to them about how they handle your data.

Retention period

Except for training records which we are obliged to retain securely for an indefinite period (see legal obligation above), we will delete from our system, or securely archive your personal data, if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for ten years. This period may be extended if we believe in good faith that the law or relevant regulators require us to preserve your data for longer. After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

How we store and transfer your data internationally

Transfer of your data to countries outside the territorial scope of GDPR will only take place when the person/business who is sponsoring your training is based outside of them.

We may also be required to provide information to support an application you have made, where a security pass is required and we are asked to provide data as a referee, in which case we will assume it is with your consent.

Your rights as a data subject

Under Article 13 of the GDPR, we are bound to provide you with information relating to your rights, as follows:

Right to object

If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days.

Right to withdraw consent

Where we have obtained your consent to process your personal data, you may withdraw your consent at any time.

Data Subject Access Requests

You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. We are required to confirm your identity before processing any such request and where we are legally permitted, we may decline your request, but we will explain the reason why to you.

Right to erasure

You have the right to request us to "erase" your personal data. We will respond to your request within 30 days and will Delete your data unless there is a legal reason for keeping you data which prevents us from agreeing to your request, in which case we will let you know why.

Right of data portability

If you wish, you have the right to transfer your data from us to another data controller. This will be by directly transferring your data to you in a commonly used machine-readable format.

Contact details

Resource Group

If you wish to legitimately exercise any of your rights, please contact:

Resource Group Data Protection Officer:

Email: data@resourcegroup.co.uk

Phone +44 (0)1285772669

Supervisory authority

Right to lodge a complaint with a supervisory authority:

You also have the right to lodge a complaint with your local supervisory authority by contacting:

The supervisory authority is:

Information Commissioner's office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

<https://ico.org.uk/>