

## **BESA Group Data Privacy Notice**

**Organisation:** Engineering Services SKILLcard Ltd  
**Service:** Card Issuing and Personnel Registration Scheme

This privacy register tells you about the personal data we collect and the associated processing activities relevant to delivering this service.

### **Our role in processing your data**

Data Controller – we have overall responsibility for your personal data.

### **About the personal data we hold**

The main categories of personal data we hold about you are as follows:

- Title, Name, Address, Telephone Number, Email
- NI Number, Gender, DOB, E-Signature, IP Address.
- Employer Details
- Occupation and Qualification Data

### **Sensitive Personal Data**

The special categories of sensitive personal data that we hold about you are as follows: ☐

We do not routinely capture any special categories of data.

### **Why we are capturing your data**

We capture your data so we can undertake the following processing activity:

- Scheme registration and associated communication
- Validation of Occupation, Qualifications and Industry Service
- Verification of Employment Status
- Allocation of SKILLcard type
- Recoding of Occupation, H&S and Qualification Data on SKILLcard
- Production of SKILLcard
- Scheme Renewals and associated communication
- Scheme Leavers and associated communication
- Update and Upgrading of Cardholders Details
- Document Archiving
- Regulatory Activity
- Anonymised Labour Studies

### **Automated decision making and profiling**

There isn't any automated decision making or profiling undertaken within the scope of our processing activity.

### **Our legal basis for processing your data**

We need a clear legal basis for capturing and processing your data. For this service this is:

- Contractual – the services we provide is defined by a service agreement or contract.
- Legitimate Interest – we will provide you with reminders relating to your SKILLcard expiry / renewal via letter, email or SMS.

### **Other legitimate interests**

There is a legitimate interest in sharing your data within the BESA Group for the purposes of:

- Utilising BESA IT systems for processing activity.
- Provision of information on related-industry matters.
- Making you aware of other relevant services/schemes provided by the Group.

### **Who we share your data with**

To enable us to deliver this service, your data will be shared with the following types of organisation.

- Payment processors
- Auditors
- SkillCard Software systems
- SkillCard producers
- A third-party texting service will be used to send you renewal reminders. Data shared is limited to name, contact number, SKILLcard type and expiry date.

### **Sending your data outside the EU / EEA**

Personal data is not transferred to a third-party outside of the European Union or European Economic Area.

### **Our criteria for retaining your data**

The personal data will be retained for the necessary time required to deliver this service and in line with relevant legislation for data retention. For the purposes of audit and to support / mitigate any future legal challenges, records will be retained indefinitely. However, we will minimise any non-essential personal data within that archive. The third-party SMS service retains the data for 2-years, but only for the purposes of audit.



#### **Consequences of not giving us your data**

By not providing the required information, we may not be able to deliver the required service.

#### **Your rights**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access  
You have the right to request a copy of the information that we hold about you.
- Right of rectification  
You have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten  
In some circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restrict processing  
Where certain conditions apply to have a right to restrict the processing.
- Right of portability  
You have the right to have the data we hold about you transferred to another organisation. □

#### **Right to object**

- You have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling  
You also have the right to object to the legal effects of automated processing or profiling.

#### **Your consent**

By consenting to this privacy notice you are giving us permission to process your personal data for the purposes identified. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time.

#### **If you have a complaint**

Should you wish to complain about how your data is being handled, in the first instance please contact the GDPR Owner specified below. If your complaint is not handled to your satisfaction, you also have the right to raise your concerns with the relevant supervisory authority.

#### **Details of the data controller**

GDPR Owner  
BESA Group  
Old Mansion House  
Eamont Bridge  
Penrith  
CA10 2BX

#### **The supervisory authority for data protection**

Supervisory Authority: Information Commissioner's Officer (ICO)  
Website: <http://ico.org.uk>  
Telephone: 0303 1231113