



Privacy Policy

React First Ltd

This policy replaces P6 Privacy Statement v2.3 and P6 Data Protection Policy 2.0 after a review following the introduction of GDPR and updates to the UK Data Protection Bill 2018.

Next review due September 2021



1. OVERVIEW

React First has a legal duty to protect your personal information and we are committed to protecting and respecting your privacy.

This Policy explains how we, React First, may collect and use the information you give us, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time, so please check this policy/page occasionally to ensure that you are happy with any changes. By using this website and corresponding with React First Ltd, you agree to be bound by this Policy.

If you have any queries about this Privacy Policy please email info@reactfirst.co.uk, write to React First Ltd, 12 Cadogan Gardens, London SW3 2RS, or telephone 0207 193 2608.

1.1 Who we are

React First is a private limited company, company number 7025586. The registered address is 12 Cadogan Gardens, London, SW3 2RS.

The information in this Privacy Policy relates to personal information which is obtained by React First Ltd and for which React First Ltd is the Data Controller and/or the Data Processor under data protection legislation.

1.2 How we collect information from you

When you request information from React First Ltd or sign up to any of our services we obtain information about you.

There are various ways you might share your personal information with React First depending on how you interact with us. At present we offer the following channels of communication (though not all may be available to you and will depend on the reason for your contact with us):

- Website
- Social Media
- Online forms
- Paper forms
- Telephone
- E-mail
- Text/WhatsApp
- Face to face

For instance, you might send us an email requesting information about our services, and personal information might be collected by us to enable us to deal with your enquiry. React First is a centre



approved and monitored by the Awarding Organisation "ITC First Ltd" to deliver first aid qualifications and training. If you attend a course with React First you will be asked to complete a registration form. The information collected on this registration form is shared with the Awarding Organisation to allow them to award first aid certificates to learners on our courses.

We do not store credit card details.

1.3 Data Sharing

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

We may have to share your data with third parties, as described below. If we do, you can expect a similar degree of protection in respect of your personal information to that provided by us. We require third parties to respect the security of your data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may pass your personal information to our third-party service providers, including contractors and designated agents, and other associated organisations for the purposes of completing tasks on our behalf (for example to issue first aid certificate). However, when we use third party service providers, we disclose only the personal information that is reasonably necessary to deliver the service.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganization, or if we're under a legal duty to disclose or share your personal data in order to comply with or enforce any legal obligation or rights or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will aim to protect your privacy.

1.4 What type of personal information is collected

Normally the only information held comes directly from you. Information is collected from you when you complete and enquiry form or a booking form on the website or when you attend a course and complete a registration form. The personal information we collect from you is limited to what is necessary to enable us to carry out the purposes for which it is collected.

The data we may collect, store and use can include the following:

- Name and contact information. We may collect your first and last name, title, job title and company name, email address, phone number and other similar contact data.
- Payment information. We collect data necessary to process your payment if you purchase one of our services. Your card information is not held by us. We use the third-party payment processor Stripe to securely process online card payments. We do not take payments over the phone.
- Any personal information which you choose to provide us with in correspondence with you.

This may be through the enquiry or booking form on our website, text, social media messaging, social media posting or any other communication that you send us.

- Photographs, videography.
- We may collect online identifiers including cookies information (for more information please see P6 Cookies Policy), the internet browser and devices you are using and the pages you visited on our website and how long you visited us for. We use Google Analytics to collect this data.

Data collected via the registration form on a course is shared with the Awarding Organisation, ITC First Ltd:

- React First regularly collects the following personal data (First Name, Surname, Email, Telephone, Mobile, Address, Town, County, Postcode, Country, Date of birth), which allow learners to be awarded qualifications by ITC First.
- React First also collects special category (sensitive data) e.g. Gender, National Identity, Ethnic Group, Special needs. ITC First are required to monitor and regularly report on this information to their external qualification regulators (Ofqual, SQA Accreditation and Qualifications Wales). The provision of this data by learners is optional.

You have choices about some of the personal information we collect. When you are asked to provide personal information, you may decline. Please note that if you choose not to provide personal information that is necessary to enable us to carry out your requests then we may not be able to fulfil that request. If this is the case we will notify you at the time.

Our lawful ground for this processing is our legitimate interest to enable us to perform the contract between you and us, or to take steps at your request to enter into a contract to deliver first aid services, to properly administer our website and to grow our business.

The ITC First Data Protection and Privacy Policy is available on their website at:

<https://www.itcfirst.org.uk/policies/policies/1.htm>

1.5 How we use your personal information

The legal basis for collecting and processing data falls under the *Legitimate Interests*, heading of the GDPR. We may use your information to:

- Process orders that you have submitted
- Carry out our obligations arising from any contracts entered into by you and us
- Award First Aid certificates
- Send reminders about qualifications which are about to expire
- Receive first aid skills updates emails
- Receive important updates or news associated with your qualification
- Seek your views or comments on the services we provide
- Notify you of changes and/or additions to our services

1.6 How long we keep your personal data for

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

When deciding what the correct time is to keep data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Specifically relating to the ITC First qualification assessment and verification documents, collected from attendees on a first aid course, the React First P2 Record Retention Policy details the exact use of personal data collected, the length of time that data is stored for, who stores it and where it is stored. To request a copy of this policy please contact the Centre Manager by email using info@reactfirst.co.uk.

1.7 How we keep your data safe

React First would like to reassure you that we use appropriate security measures to protect your personal information against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures may include, but are not limited to, a range of organisational safeguards such as staff training and the following technical safeguards listed below. We have a procedure in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

Non-sensitive details (your email address etc.) are transmitted normally over the internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

2. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

By law you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for process it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please send a written request to our Data Protection Officer by email- data-protection@reactfirst.co.uk or by post, marked for the attention of the Data Protection Officer at React First, 12 Cadogan Gardens, London, SW3 2RS.

We will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested)

3. USE OF COOKIES

Like many other websites, the React First website may collect online identifiers including cookies information (for more information please see P6 Cookies Policy available on our website www.reactfirst.co.uk), the internet browser and devices you are using and the pages you visited on our website and how long you visited us for. We use Google Analytics to collect this data. This is statistical data about your browsing actions and patterns and does not identify you as an individual.

4. ORGANISATION CONTACT

We have appointed a Data Protection Officer to oversee compliance with this Policy. If you have any questions about this Policy or how we handle your personal information, please contact our Data Protection Officer by email- data-protection@reactfirst.co.uk or by post, marked for the attention of the Data Protection Officer at React First, 12 Cadogan Gardens, London, SW3 2RS.

5. RIGHT TO MAKE A COMPLAINT

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
Call: 0303 123 1113. Email: casework@ico.org.uk