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1. Introduction & Scope

Richardson Rail Services ltd, including any trading as names associated or grouped to us e.g. Richardson Training Ltd ("we", "us", "our") is committed to protecting your personal data and privacy in accordance with UK data protection law. This Privacy Policy applies to all personal data we collect or process in connection with:

- Our website (including user sign-up, course enrolment, payments, customer support).
- Our e-learning platform and associated services (e.g. LearnDash, LMS, GamiPress).
- Our in-person training, assessments, events, and workshop activities, including candidate registration, identity checks, assessment data, attendance, health declarations, certifications, sponsor/employer reporting.
- Our operations as a training and certification provider, including interactions with awarding bodies, registries, sponsors, subcontractors, and clients.

It is a single, unified policy covering all data streams, unless otherwise specified.

This document also explains your rights and how to exercise them, our legal bases, and how we protect your data.

2. Data Controller, DPO, and Contacts

We are registered with the ICO – Reg number: ZA884995

Data Controller:
Richardson Rail Services Ltd.
Address: Richardson House, Richardson Rail, Daux Road, Billingshurst RH149SJ
Email: training@richardsonrail.co.uk
Phone: 01403 586036

Data Protection Officer / Contact Point (if appointed):
Rhys Richardson. Managing Director.

01403 586 036 / rhys@richardsonrail.co.uk

If you have privacy questions or concerns or wish to make use of any of your rights, you may contact the above.

3. What Personal Data We Collect

We collect and process different categories of personal data depending on your relationship with us (website user, learner, candidate, sponsor, client, group leader etc.).

3.1 Website / E-learning Users

- Name, email address, telephone number
- Username, password / login credentials
- Billing and payment details (credit card / invoicing)
- Company affiliation, job role (if sponsored)
- Course enrolment and progress data, quiz / test scores, uploaded files
- Certificates, badges, rank/points/leaderboard data
- Support queries, feedback, communications
- Technical / usage data: IP address, device, browser, cookies, referral URLs
- Home and billing address

3.2 In-Person Candidates / Trainees / Clients / Sponsored Staff

- Identity documents (e.g. photo ID, passport, driver's licence)
- Sentinel / access scheme IDs, registration numbers
- Attendance records, course completion and assessment data
- Health / medical declarations (where required for training)
- Emergency contact, next-of-kin
- Employer, sponsor, contract or booking details
- Feedback, personal reflections, surveys
- Photographs, video recordings during training (if applicable)
- Payment / invoicing / expense records
- Non-complete and privacy clause agreements
- Contact details and home addresses

3.3 Business Contacts, Suppliers, and Contractors

- Name, role, business email, business address
- Correspondence, invoicing, bank or payment details
- Contractual documents, performance records
- Identity documents (e.g. photo ID, passport, driver's licence)
- Sentinel / access scheme IDs, registration numbers
- Attendance records, course completion and assessment data
- Health / medical declarations (where required for training)
- Emergency contact, next-of-kin
- Employer, sponsor, contract or booking details
- Feedback, personal reflections, surveys
- Photographs, video recordings during training (if applicable)

- Payment / invoicing / expense records
- Non-complete and privacy clause agreements
- Contact details and home addresses

4. Purposes & Lawful Bases of Processing

Below is a non-exhaustive mapping table. You should maintain an internal full Record of Processing Activities (RoPA) that goes into more depth.

Purpose / Processing Activity	Categories of Personal Data	Lawful Basis	Notes / Comments
User registration, login, account administration	Name, email, login credentials	Contract (or pre-contract)	to perform our service to you
Course enrolment and delivery (online & offline)	Name, contact, progress, assessments	Contract / Legitimate interest	training relationship
Identity verification & access scheme checks	ID data, Sentinel, registration	Legal obligation / Contract	required by regulators or awarding bodies
Issuing certificates, CPD logs & tracking	Assessment results, user details	Contract / Legal obligation	for compliance and audit
Reporting to sponsors / employers / clients	Name, enrolment, results	Legitimate interest / Contract	where sponsor has right to this info
Billing, payment, accounting	Name, address, financial details	Contract / Legal obligation	accounting, tax compliance
Support, feedback, communications	Contact details, support logs	Legitimate interest / Consent	support, quality improvement
Marketing, events, offers (optional)	Email, name	Consent (or legitimate interest, carefully)	must allow opt-out
Administration, internal audit, quality assurance	Usage data, logs	Legitimate interest	business improvement, audit trail
Legal compliance, dispute resolution, fraud	Various data	Legal obligation / Legitimate interest	legal safe-keeping

prevention			

Important Notes / Best Practices:

- For each specific processing activity, you must be able to show which lawful basis you rely on and document it.
- Where you rely on consent, it must be freely given, specific, informed, unambiguous, and you must provide withdrawal options.
- In relationships where consent will likely not be freely given (e.g. employer / student / training service context), you should not rely on consent for essential processing — instead choose contract, legal obligation or legitimate interest where appropriate.
- For special category data (e.g. health/medical, disability, biometric), you will need an additional condition under Schedule 1 DPA 2018 or explicit consent.
- Where you rely on legitimate interest, you should perform and record a legitimate interest assessment (LIA) balancing your interest vs individuals' rights.

5. Sharing, Recipients & International Transfers

5.1 Who We Share With

We may share your personal data, within limits and under safeguards, with:

- Awarding bodies, certification bodies, regulators (e.g. NSAR, Sentinel, Qualsafe) for competence validation, registration, audit.
- Employer sponsors or client organisations for reporting and compliance.
- Subcontractors, service providers (e.g. LMS hosts, payment processors, IT infrastructure, analytics, email platforms).
- Government, law enforcement, regulators if legally obligated.
- Analytics providers, remarketing services (for web usage).
- Third parties in connection with mergers or business transfers (subject to safeguards and notice).
- Other candidates, sponsors, employers and course/service attendees.

We will enter into data processing / sharing agreements with third parties to ensure they only act per our instructions and comply with data protection standards.

Where possible, we will name or meaningfully describe major recipients (rather than generic "third parties"). Because the ICO has flagged overly broad "business partners" or "analytics providers" as noncompliant.

5.2 International Transfers

If personal data is transferred outside the UK or EEA, we ensure it is protected by appropriate safeguards, such as:

- Adequacy decision (if applicable)
- Standard Contractual Clauses (SCCs) or International Data Transfer Agreement (IDTA)
- Binding corporate rules (if applicable)

We will list which countries we may transfer to, and how they are protected.

6. Data Retention Policy

We retain personal data only as long as necessary for each purpose, taking into account legal, regulatory, contractual, and business needs. After that, data is either securely anonymised or destroyed.

Below is a sample retention schedule. You must tailor this to your operations and regulatory requirements:

Category of Data	Retention Period	Reason / Basis
Course enrolment, assessment records	7 years after course completion	audit, regulatory, defence of claims
Financial / billing / invoicing	7 years	statutory accounting / tax laws
Identity verification / ID documents	Until expiry + 7 year	compliance, verification
Health / medical declarations (if collected)	Course duration + 7 years	only as needed
Website logs, analytics	24–36 months	usage trends, improvement
Marketing preferences / unsubscribe records	Until withdrawal + reasonable period	to maintain suppression lists
Support tickets / communications	7 years	reference, dispute resolution

We will review retention periods periodically and apply criteria (purpose, risk, legal obligations).

7. Cookies, Tracking & Similar Technologies

We use cookies and similar technologies for:

- Authentication, login persistence, course progress tracking
- Functional site operations (shopping cart, preferences)
- Analytics (e.g. Google Analytics)
- Marketing and remarketing (where consented)

We will present a cookie notice / consent banner on first visit, allowing users to accept or reject non-essential cookies.

We will provide a Cookie Policy (or section) listing:

- Types of cookies (strictly necessary, functional, analytics, targeting)
- Purpose of each cookie, how long they last
- How users can disable them or withdraw consent

We must ensure cookie consent is obtained before non-essential cookies are dropped, and that users can change their preferences.

8. Security, Integrity & Confidentiality

We commit to adequate technical and organisational measures to protect personal data against unauthorized access, loss, alteration, or disclosure. These include (but are not limited to):

- Encryption (in transit and at rest)
- Secure servers and firewalls, intrusion detection
- Access controls, role-based permissions, multi-factor authentication
- Regular backups, disaster recovery plan
- Penetration testing, vulnerability scanning
- Secure disposal / destruction of devices and media
- Employee training on data protection, handling breaches (induction + refresher)
- Logging, monitoring, and audit trails of access
- Vendor / subcontractor security assessments

We will review security measures periodically and update as risks evolve.

9. Data Breach Management & Notification

We maintain a Data Breach Response Plan. In the event of a personal data breach, we will:

1. Assess whether the breach is likely to result in a risk to the rights and freedoms of individuals.
2. If so, notify the ICO without undue delay, and where feasible within 72 hours, unless the breach is unlikely to pose such risk.
3. Where required, notify affected data subjects (especially where there is likely a high risk).
4. Document the breach, actions taken, lessons learned, and mitigation.
5. Review and improve security and processes to prevent recurrence.

We will assign clear roles (breach lead, communications, technical) and test the plan periodically.

10. Data Subject Rights

Under UK GDPR, individuals have the following rights, subject to certain conditions and exemptions:

- **Right of access (Subject Access Request, SAR)**: request a copy of personal data we hold about you.
- **Right to rectification**: correct inaccurate or incomplete data.
- **Right to erasure ("right to be forgotten")**: in certain cases (e.g. no longer needed, consent withdrawn).
- **Right to restriction of processing**: pause certain uses of your data.
- **Right to objection**: particularly for processing based on legitimate interest or for direct marketing.
- **Right to portability**: receive your data in structured, machine-readable form to send to another controller, where processing is based on consent or contract.
- **Right to withdraw consent**: where processing is based on consent, you can withdraw at any time.
- **Rights related to automated decision-making / profiling**: though we do not engage in legally binding automated decisions (see below).

To exercise any rights, contact **rhys@richardsonrail.co.uk**. We aim to respond within one month (unless a complex request, when extension may apply).

We will also inform you of any refusal or partial refusal, giving reasons and information about rights of complaint.

Exemptions & Limitations

Certain rights may be restricted (e.g. in fulfilling legal obligations, safeguarding examinations, preventing fraud). We must explain if and when such restrictions apply.

11. Automated Decision-Making & Profiling

We do not use automated decision-making with legal or similarly significant effects (e.g. automatically denying enrolment).
If profiling or automated scoring is used (e.g. in gamification), it does **not** affect candidate eligibility or rights without human oversight.

If this changes in future, we will disclose logic, significance, and rights to contest.

12. Children and Minors

Our services are aimed primarily at persons aged 16 and over (or the legal adult age).
If we accept participants under 16 (e.g. apprentices), we will:

- Obtain verifiable consent from parent / guardian for data collection in relation to information society services (online).
- Provide notices understandable to children's level of maturity.
- Apply extra care in handling, storing, and restricting access to their data.

13. Marketing & Communications

We may send you:

- Service notices (e.g. reminders, course updates) — necessary for contract performance.
- Non-essential marketing (newsletters, promotions) only with your consent, or sometimes under legitimate interest (but with a clear opt-out).

You can always unsubscribe or withdraw consent via links in emails or by contacting us. We will not send marketing to individuals who have opted out and will maintain suppression lists.

Where consent for marketing is given, we will record time, method, and what was consented to.

14. Transfer / Sale of Business

In the event of a merger, acquisition, sale, or reorganisation, we may transfer personal data as part of business assets. Any transferee must respect this Privacy Policy or provide adequate protection and notice to individuals.

15. Updates & Versioning

We will review this policy at least annually, or when:

- Our data processing practices change
- New regulations or guidance are introduced
- We implement new systems or services

We will publicly publish the updated version on our website and notify active users of material changes (e.g. via email).

We will maintain a version history (dates, summary of changes).

16. Glossary & Definitions

For clarity, define terms such as “personal data”, “processing”, “controller”, “processor”, “consent”, “legitimate interest”, “special category data”, “data subject”, “automated decision-making”, etc.

Signed: 

Name: Rhys Ricardson

Position: Managing Director

Date: 23rd April 2026

Appendix A – Company Registration

Richardson Rail Services Ltd, including any trading names associated with or operated by us (such as Richardson Training Ltd) ('we', 'us', 'our'), is the data controller for all personal data processed in connection with our services.

Registered in England and Wales – Company No. 06095700

Registered office: 16 Lower Station Road, Billingshurst, West Sussex, United Kingdom, RH14 9SX.

Contact: 01403 586036

Appendix B – Short Web Privacy Policy Summary (e.g. for use on our website(s))

Privacy & Data Protection Notice
Last updated: 23/04/2025

Richardson Training Ltd ("we", "our", "us") is committed to protecting your privacy and handling your personal information safely, fairly, and transparently. This notice explains what information we collect, why we collect it, and how we protect it.

Who We Are

Richardson Rail Services ltd, including any trading as names associated or grouped to us e.g. Richardson Training Ltd ("we", "us", "our"). You can contact us at **rhys@richardsonrail.co.uk** or call **01403 586036** for any privacy-related queries.

What Information We Collect

We collect personal data when you:

- Create an account, sign up for a course, or fill in a form on our website.
- Take part in online learning, assessments, or in-person training.
- Contact us by email, phone, or online chat.

This may include your name, email, contact details, employer or sponsor, course progress, assessment results, certificates, uploaded files, and payment information.

For certain courses, we may also collect identity checks or limited health information where required for safety or regulatory reasons.

How We Use Your Data

We use your data to:

- Register and manage your courses or training bookings.
- Deliver training and assessments, both online and in person.
- Issue certificates, CPD records, and maintain compliance evidence.
- Provide customer support and manage your account.
- Improve our services and ensure quality assurance.
- Meet legal, safety, and audit obligations.

We do not sell your personal data.

Lawful Bases for Processing

We process your data because it's necessary for:

- **Contract performance** – to deliver the course or service you've purchased.
- **Legal obligations** – where required by training or safety regulations.
- **Legitimate interests** – to manage and improve our business.
- **Consent** – when you choose to receive marketing or optional updates.

Sharing Your Information

We may share data with:

- Awarding or assurance bodies (e.g. NSAR, Sentinel, Qualsafe) for certification.
- Employers or sponsors (where agreed).
- Technology partners providing our website, e-learning, or payment services.
- Regulators or authorities if legally required.
- Other candidates / attendees / sposnors

All third parties are under strict data protection contracts and security standards.

Cookies & Analytics

We use cookies for site functionality and anonymous analytics.
You can manage or reject non-essential cookies using your browser or our cookie banner.
See our Cookie Policy for details.

How Long We Keep Your Data

We keep your data only for as long as needed to meet legal, contractual, or audit requirements — typically:

- Course and assessment records: up to 7 years after completion.
- Financial records: 7 years (tax and accounting).
- Website analytics: usually 24–36 months.

Your Rights

You have the right to:

- Access, correct, or delete your data.
- Object to certain uses of your data.
- Withdraw consent at any time.
- Request data portability.

To exercise your rights, contact **rhys@richardsonrail.co.uk**.
If you're unhappy with our response, you may contact the Information Commissioner's Office (ICO) at www.ico.org.uk/concerns.

Security

We protect your data using encryption, secure servers, and controlled access.
Our staff and partners are trained in data protection, and we review security measures regularly.

Updates

We review this policy at least annually and whenever we make significant changes to our systems or services. The latest version will always be published here.

Appendix C - Consent & Acknowledgement Text (General Use)

By submitting this form, you confirm that the information provided is accurate and agree that Richardson Training Ltd may process your personal data in accordance with its Privacy Policy.

Your details will be used only to manage your enquiry, booking, or course participation and, if you choose, to send updates or offers.

You can withdraw consent or request deletion of your data at any time by emailing **rhys@richardsonrail.co.uk**.