**OSM Privacy Notice**

This statement is provided with the intention to comply with your right to be informed under the General Data Protection Regulation (GDPR). The School may hold and process the following information:

* Your personal and contact details including your name, telephone numbers, email addresses, home address,
* Of your employment including your job title,
* Of your qualifications and skills including references, licences, certificates and training,
* IT usage information including email addresses, log-ins, passwords to Portals

The School is the controller, together with the training course accrediting body of this information in that we may request information from you, and we are also the processor of this information.  This data has been gathered so that you can attend the course.

You are party to the contract to attend the course and the data is processed on this basis.  It is also processed based on our legitimate interests to demonstrate that we have fulfilled our contractual obligations to supply the course to you and to demonstrate to our awarding bodies that we fulfil the requirements of the awarding bodies as a deliverer of training.

The officer responsible for the protection of your data is the School Principal, the Data Protection Officer.

Your data will be used to permit you attend the course.  It will also be used as evidence to demonstrate that we have fulfilled the terms and conditions of our service to you and the requisite standard.    It will also be used to evidence the School have fulfilled the requirements of our awarding bodies.

The failure to provide us with the data may impact on your ability to attend our training course.

The recipients of your data are the School and those engaged to deliver OSM courses and we anticipate that we may need to share personal data with your employer (if the course is booked by your employer), our accrediting/awarding bodies, legal advisers and professional advisers (e.g. your name, contact information and other personal data which is necessary where we need advice), tribunals and courts (e.g. your name and other personal data which is necessary for the determination of claims where litigation is commenced).  It is not anticipated that there will be any other recipients nor any transfers of data to a third party or outside the UK.  Accordingly, it is considered that safeguards for the transfer of data to a third country are not necessary.  Should this change you will be notified.

Your data will be kept for a period of 6 years following the completion of your course.  This period has been set for the protection of our organisation for the limitation period for the filing of a breach of contract or professional negligence claim.  If such a claim has been filed, the data will be retained for a period of 6 years following resolution of that claim and for 6 years following the resolution of any further claims.  This period has been determined for the protection of the organisation in the event any professional negligence or breach of contract claims in the event we use representation to defend any claims.

You have the right to be informed of fair processing information with a view to transparency of data.  This statement is intended to fulfil that right.

You have the right to access the information we hold.  You should make such a request in writing to the School Principal (Data Protection Officer) using the contact information at the end of this notice.  The School shall provide the data within 1 month.  In exceptional cases we may extend this to 3 months.  You will be notified within 1 month when we believe this to be an exceptional case requiring a longer period of compliance.  Where a request is manifestly unfounded or excessive, the School charge a reasonable fee or refuse the request.  In the event of a fee or refusal, you will be advised of this and your further rights relating to the fee or refusal.

You have the right to request the information we hold is rectified if it is inaccurate or incomplete.  You should contact the School Principal (Data Protection Officer) using the contact information at the end of this notice and provide the details of any inaccurate or incomplete data.  We will then ensure that this is amended within one month.  We may, in complex cases, extend this period to two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing.  We have the right to refuse to erase data where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims.  You will be advised of the grounds of our refusal should any such request be refused.

You have the right to restrict our processing of your data where you contest the accuracy of the data until the accuracy is verified.  You have the right to restrict our processing of your data where you object to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our organisation’s legitimate grounds override your interests.  You have the right to restrict our processing of your data when processing is unlawful, and you oppose erasure and request restriction instead.  You have the right to restrict our processing of your data where we no longer need the data and you require the data to establish, exercise or defend a legal claim.  You will be advised when we lift a restriction on processing.

You have the right to data portability in that you may obtain and reuse your data for your own purposes across different services, from one IT environment to another in a safe and secure way, without hindrance to usability.  The exact method will change from time to time.  You will be informed of the mechanism that may be in place should you choose to exercise this right.

You have the right to object to the following:

* processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
* direct marketing (including profiling); and
* processing for purposes of scientific/historical research and statistics.

The data collected is not anticipated to fall within the above categories.

Whilst there is no anticipated automated decision making relating to the data you provide, you have rights where there is automated decision-making including profiling.  We may only do this where it is necessary for the entry into or performance of a contract, authorised by EU or the UK law or based on your explicit consent.  Whilst it is not anticipated that this will occur, where it does, we will give you information about this processing, introduce to your simple ways for you to request human intervention or challenge a decision, and carry out regular checks to ensure that our systems are working as intended.

Where the data has been provided with your consent, you have the right to withdraw your consent at any time.

You have the right to lodge a complaint with a supervisory authority such as the Information Commissioner’s Office or any other of our regulators or accreditors that may regulate or provide accreditations to us from time to time.  We advise that you exhaust our internal complaints procedure prior to referring the matter to any supervisory, regulatory or accrediting body.  A copy of our complaints process is available from the School Principal (Data Protection Officer) using the contact information at the end of this notice.

School Principal (Data Protection Officer)

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