

PRIVACY POLICY:

The Safety Savvy Ltd is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, store, and share your personal information when you visit our website, enquire about or book our first aid courses, or interact with us in other ways.

Last Updated: 21st June 2025

1. Who We Are (Data Controller)

The Safety Savvy Ltd is the data controller responsible for your personal data.

Registered Office: 25 Greenway Gardens, London, United Kingdom, NW9 5AY

Company Registration Number: 16473135

Contact Email: contact@thesafetysavvy.com

Contact Phone: 07442 321986

2. The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data: includes first name, last name, title, date of birth.
- Contact Data: includes billing address, delivery address, email address, and telephone numbers.
- Financial Data: includes bank account and payment card details (note: we do not directly store full card details; these are handled by secure payment processors).
- Transaction Data: includes details about payments to and from you and other details of courses you have purchased from us.
- Course Data: includes details relevant to your participation in our first aid courses, such as [e.g., any declared medical conditions relevant to course participation, emergency contact details, previous qualification history, assessment results/certificates issued].
- Marketing and Communications Data: includes your preferences in receiving marketing from us and your communication preferences.
- Any other specific data we may collect: Survey responses and feedback post course.

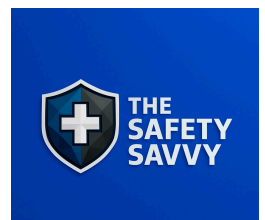
We also collect, use, and share Aggregated Data such as statistical for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of those who have booked a course with us, the percentage pass rate etc. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify

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you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Sensitive Personal Data: We may collect certain special categories of personal data (also known as sensitive personal data), such as [e.g., health information related to a declared medical condition that might affect your ability to participate in practical aspects of a first aid course, or for reasonable adjustments]. We will only collect and process such data where there is a clear lawful basis and necessity, typically with your explicit consent or where necessary for reasons of substantial public interest (such as health and safety during a course).

If you fail to provide personal data: Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with courses). In this case, we may have to cancel a course you have booked but we will notify you if this is the case.

3. How We Collect Your Data

We use different methods to collect data from and about you, including through:

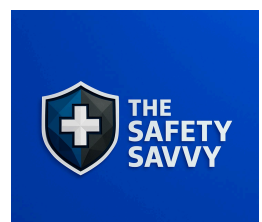
- **Direct interactions:** You may give us your Identity, Contact, Financial, Course and Marketing and Communications Data by filling in forms or by corresponding with us by phone, email, or otherwise. This includes personal data you provide when you:
 - apply for our courses;
 - subscribe to our mailbox;
 - request marketing to be sent to you;
 - complete a survey
 - give us feedback or contact us.
- **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, Browse¹ actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
 - Awarding Bodies for verification of previous qualifications or certification.

4. How and Why We Use Your Data (Lawful Basis)

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

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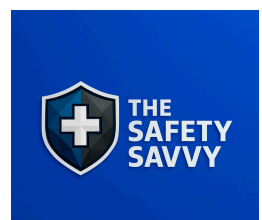
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- **Performance of a Contract:** This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. (e.g., to process your course booking, deliver the training, issue certificates).
- **Legitimate Interests:** This means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. (e.g., to improve our website, prevent fraud, send you relevant marketing communications where you have not opted out).
- **Comply with a Legal Obligation:** This means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to. (e.g., maintaining financial records, health and safety obligations).
- **Consent:** Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Below is a table outlining how we plan to use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of Data Involved	Lawful Basis for Processing
To register you as a new customer/course participant	Identity, Contact	Performance of a contract with you
To process and deliver your course booking	Identity, Contact, Financial, Transaction, Course	Performance of a contract with you
To manage our relationship with you	Identity, Contact, Marketing & Comms	Performance of a contract, Legitimate Interests



To administer and protect our business and website	Technical, Usage	Legitimate Interests, Compliance with legal obligation
To deliver relevant website content and advertisements	Technical, Usage, Marketing & Comms	Legitimate Interests (to grow our business)
To send you marketing communications	Contact, Marketing & Comms	Legitimate Interests, Consent (if applicable)
To notify you about changes to our terms/privacy policy	Identity, Contact	Compliance with legal obligation, Performance of a contract

Marketing:

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

- Promotional offers from us: We may use your Identity, Contact, Technical, Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which courses, services and offers may be relevant for you.
- Third-party marketing: We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
- Opting out: You can ask us or third parties to stop sending you marketing messages at any time³ by following the opt-out links on any marketing message sent to you or by contacting us at any time.

5. Disclosures of Your Personal Data

We may share your personal data with the parties set out below for the purposes stated in section 4.

- External Third Parties:

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- Service providers acting as processors who provide IT and system administration services (e.g., website hosting, CRM providers, email marketing platforms).
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- HM Revenue & Customs, regulators, and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Payment processing services (e.g. Tide) to process secure payments.
- First Aid Awarding Bodies (e.g. Nuco Training) for registration, certification, and verification of course completion.

We require all third parties to respect the security of your personal 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 and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International Transfers

We store your personal data within the UK. Some of our external third parties may be based outside the UK and European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the UK/EEA.

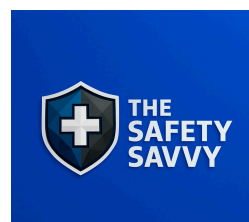
Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government or European Commission.
- Where we use certain service providers, we may use specific contracts approved by the UK government or European Commission which give personal data the same protection it has in the UK/EEA.
- Where providers are based in the US, we may transfer data to them if they are part of the EU-US Data Privacy Framework (formerly Privacy Shield) or have similar robust safeguards.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a



business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

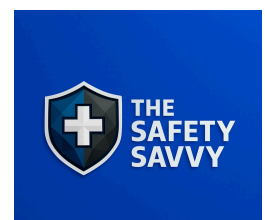
- By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years plus the current financial year after they cease being customers for tax purposes.
- Course records and certifications may be retained for longer periods as required by awarding bodies or industry standards, e.g., 7-10 years.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that



we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at contact@thesafetysavvy.com.

No fee usually required: You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you: We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond: We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Cookies and Tracking Technologies

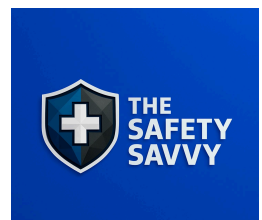
Our website uses **only essential (necessary) cookies** to ensure its proper functioning and security. These cookies are required for core features such as page navigation, secure login, and accessibility. Without these cookies, the website cannot function properly.

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We do **not** use cookies for analytics, marketing, or personalization purposes.

By continuing to use our website, you acknowledge the use of these necessary cookies. If you wish to disable cookies, you can do so through your browser settings; however, this may affect the functionality of the website.

11. Links to Other Websites

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

12. Changes to This Privacy Policy

We keep our Privacy Policy under regular review. Any changes we may make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes.

13. Complaints

If you have any concerns or complaints about our use of your personal data, please contact us directly in the first instance at contact@thesafetysavvy.com so that we can try to resolve it for you.

You also 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

