

# Trigonos Privacy Statement

The TRIGONOS Privacy Statement sets out your rights and the measures the company will take to protect your personal data. This includes how we will use your information and how the law protects you as an individual. Trigonos is a Data Controller and a Data Processor as defined under the General Data Protection Regulations (GDPR).

## What is personal data?

Personal data means any information relating to an individual who can be directly or indirectly identified by reference to the information. Individuals are referred to as **Data Subjects** under the legislation. A wide range of information constitutes personal data including names, addresses, and identification numbers such as National Insurance numbers. Regulations covering dealing with this information applies to both digital and paper-based information.

What does processing mean?

The processing of personal data means any action undertaken with the information including viewing, collecting, sharing, storing, transferring or analysing it. This can be carried out by both a Data Controller or a Data Processor.

## Who holds your personal data?

Your personal data will be held by Trigonos. We have appointed a Senior Person Responsible to manage data within Trigonos. Enquiries about data holding and use can be directed to that person through the contact details on our website.

Trigonos is registered with Information Commissioner's Office (ICO), as required by law. The company's ICO registration number is A8378496.

## Why is your personal data required?

When you request that Trigonos provide you a the service or product you will need to provide us with certain personal data to enable us to process your application, form a contract and provide the service or product you have requested. Given the nature of the company's business (primarily supplying accommodation and related facilities for events) the data we require is generally straightforward covering, for example names, addresses, phone numbers and other contact details.

## How will we use your personal data?

The GDPR legislation only allows the processing of personal data if one or more conditions are met; this is known as a **lawful basis for processing**. There are six lawful bases provided under GDPR (see Annex 1 below). Trigonos only processes personal data for the reasons it has given, and where there is a lawful basis for doing so.

What we use your personal data for	The lawful basis for processing information	Our legitimate interest in using your data
To provide the services and products you have requested from us, including marketing information	Fulfilling a contract agreed between us (contract)	ensuring we meet requests for services and goods you have made
To run our business properly and efficiently	We are legally required to complete certain activities (legal obligation) undertaking activity for you (legitimate interest)	complying with any regulations that apply to us. e.g. VAT charges and payments

## What personal data will Trigonos use?

Different types of personal data are used as listed below:

- **contact information:** addresses, telephone numbers, email addresses
- **personal details:** only those details relevant to our stated purpose of providing certain services and products to you e.g. chosen title, date of birth
- **special categories of personal data:** this is also known as sensitive personal information. Trigonos will only collect this information at your request and for specific purposes. Such information is generally limited to essential dietary requirements and any disability that you ask us to take into account or that might limit your use of what we provide
- **financial information:** covering any information required so that you may make payments to Trigonos and vice versa, as is necessary
- **contractual information:** covering services and products we provide to you
- **administrative information:** registration numbers and administrative reports generated in the normal day-to-day operation of the company

From where do we obtain your personal data?

Your personal data is that which you provide when carrying out your business with us through:

- subscribing to receive digital or paper-based information about our services and products
- sending us emails or letters relating to your business enquiry
- talking with us on phone or in person
- completing a contract form for receiving services and products
- transfer of data to others via third parties with whom you have contracted and given permission to do so. e.g. when Trigonos contracts directly with a course provider to provide services and products in support of their course which a person then choose to join

### **Who do we share your personal data with?**

Trigonos will only share your data if there is a lawful basis to do so. We will treat all your personal data as private and confidential and in accordance with data privacy legislation (even when you are no longer a customer). Information we hold about you will not be disclosed to anyone unless:

- we are legally required to disclose the information. This includes, for example, sharing your information with tax authorities and law enforcement agencies such as HMRC or the police;
- we need to disclose the information for the purposes of or in connection with any legal proceedings, or for the purposes of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- disclosure is required to protect our legitimate interests;
- disclosure is made with your consent;
- disclosure is to a third party for the purposes of providing administrative or processing services on behalf of Trigonos. If this is required, we will ensure that the third party protects your personal data in the same way that we do.

### **The use of your personal data by third parties**

When a third party processes your personal data on our behalf, we ensure that they follow our instructions to process and protect your personal data. Third parties are required to sign agreements in which they commit themselves to safeguard your personal data, agree to only use the data to provide services to us specifically outlined in the agreement, and follow our instructions.

Your personal data will be shared with the following categories of third parties for the purposes described:

Category of third parties	Data type	Purposes
Administrative & information services	Contact information, personal details, financial/contractual/ transactional information	To provide you with the services or products you have enquired about or contracted for
Governmental departments	Any information requested, once legal authority has been verified.	To fulfil our legal and regulatory obligations

### Does Trigonos share your data outside of the European Economic Area?

We will not normally disclose or transfer personal data to organisations outside of the European Economic Area (EEA). When we do transfer personal data outside of the EEA, we will make sure that it is protected at the same level as within the EEA by using one of these safeguards:

- transfer data to organisations in non-EEA's with privacy laws in place providing the same level of data privacy and protection as within the EEA
- transfer data to organisations that are party to *Privacy Shield* which is an international framework that sets privacy standards at a similar level to those of the EEA.

### Marketing communications

From time to time we will send you information about our services and products and for which you have given Trigonos permission to do so. You will also be provided with an opportunity to stop receiving information from us through a 'safe unsubscribe' link in any such emails we may send you or through you writing to us requesting the company to stop sending you such material.

If you are not yet a customer of Trigonos and want to receive marketing communications from us, you can request this through our website or by calling our office. You will be asked to provide us with your contact details and to give your consent for us to use this personal data. You may withdraw your consent and unsubscribe from the marketing communications

whenever you want. We will never give your personal data to anyone else for marketing purposes without obtaining your prior written consent.

### How long does Trigonos keep my personal data for?

As long as you are a customer of Trigonos we will process your personal data to provide you with the services and products you have asked us to provide. After you end your contact with Trigonos we may retain some or all of your personal data for up to 4 years for one or more of these reasons:

- to respond to any questions or complaints
- to meet our ongoing legal and regulatory requirements

### What are your rights?

The GDPR entitles you to several rights in relation to your personal data:

- **The right to be informed**

You have the right to be informed about the collection, use and sharing of your personal data. Organisations must provide you with certain information at the time personal data is collected. This Privacy Statement provides you with the information you are entitled to and we are required to give you.

- **The right to access your data**

You have the right to access your data to establish what it is being used for and verify the lawfulness of any processing. Before providing access to your personal data we will ask you to verify your identity to protect you from identity theft and financial crime.

- **The right to correct mistakes and inaccuracies**

It is important that any personal data we use is accurate, up to date, and relevant. To ensure that your data is correct you have the right to access, correct and/or update your personal data at any time. If you think your data is incorrect or incomplete and you wish to correct your data or privacy settings, please contact us.

- **The right to the deletion of your personal data**

You have right to request that we delete your personal data if:

1. your personal data is no longer needed in relation to the purposes for which it was collected;
2. you withdraw your consent and there is no other legal basis to Trigonos processing your personal data;
3. you object to us processing your personal data for direct marketing purposes;
4. you object to us processing your personal data for the legitimate interests of Trigonos;

5. you feel that your personal data is not being processed lawfully;
6. your personal data needs to be deleted to comply with legal requirements.

- **The right to restrict processing**

You have the right to request the restriction of the processing of your personal data for a limited period and under certain circumstances. For example, this could apply if you feel that your personal data is inaccurate. Trigonos has the right to store your personal data while your query is investigated.

- **The right to data portability**

You have the right to receive your personal data in a structured, commonly used and machine-readable format.

- **The right to object to processing**

You have the right to object to the processing of your personal data based on legitimate interests, direct marketing, and processing for historical research

- **Rights related to automated decision making, including profiling**

Trigonos does not undertake any processing which includes decisions made by automated means, including profiling.

## How to Complain

Please contact Trigonos if you have any concerns about how we process your personal data. Details on how to do this are included on our website. You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO). Contact details are found on their website: <https://ico.org.uk/for-the-public/>

## Annex 1

### The six bases for lawful Data Processing

One of six allowable lawful bases for processing must be satisfied for Trigonos to process your personal data. The six lawful bases are:

- Consent – the individual has given clear consent
- Contract – processing is necessary for a contract to be provided
- Legal obligation – processing is necessary to comply with the law
- Protect life – processing is necessary to protect someone's life
- Public interest – processing is necessary to perform a task in the public interest
- Legitimate interest – processing is necessary for Trigonos' legitimate interests, or the legitimate interests of a third party, unless there is a good reason otherwise