# **Blake Emergency Services Privacy Policy**

We take the privacy of your data very seriously. This Privacy Policy sets out how we collect and use your personal data in connection with our website.

### **Data Controller**

The 'Blake Group' is made up of Airline Training Associates Ltd and Blake Emergency Centre Limited (whose registered offices are at 29-30 Fitzroy Square, London, W1T 6LQ). Airline Training Associates Ltd trades as Blake Emergency Services and Blake Archaeology and Anthropology Services. When we mention ["Blake"], "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Blake Group responsible for processing your data. Airline Training Associates Ltd is the is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the following contact details:

Email: info@blakeemergency.com;

or by post to: James Allen House, 61-63 Buxton Road, Disley, Cheshire, SK12 2DZ, England.

#### **How Do We Collect Personal Data?**

In operating our website, we collect and process data in the following ways:

- From information that you provide directly to us by filling in forms on our website, such as our 'Contact Us' form.
- Automatic collection of details of your visits to our website and the resources that you access (for further information on this, please see 'Use of Cookies' below).
- Personal data provided to us when you communicate with us for any reason.

# What Type of Personal Data Do We Collect?

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

- Your name and contact details (including postal address, email address and telephone number).
- Information about your activities on our website, such as your IP address, geographical location, and how you navigate the website (e.g. length of visits to certain pages).

Any other personal information you choose to share with us.

Under Data Protection laws, sensitive data requires greater protection. This includes, for example, information about your health, ethnicity and religion. We do not usually collect sensitive data about you via our website, unless there is a valid reason for doing so and data protection laws allow us to.

#### **How Do We Use Your Personal Data?**

We will only use your personal data when the law allows us to. Most commonly, we will rely on the following lawful bases to use your personal data:

- Where we need to perform the contract we are about to enter into or have entered into with you (**Contractual**).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (Legitimate Interests). We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal obligation (Legal Obligation).
- Where you agree to us sending you information about our products and services (Consent)

The information that we collect and store relating to you is primarily used for the following purposes. We have stated after each one the lawful basis we rely on in order to process your data and in the case of Legitimate Interests we have explained what those interests are:

- To enable us to provide our services to you Contractual.
- To provide you with information requested from us which relate to our services Contractual, Legitimate Interests (to develop our products/services and grow our business)
- To provide information or updates which we feel may be of interest to you, where you have enquired about or purchased our services and not opted out of marketing communications – Legitimate Interests (to develop our products/services and grow our business)[, Consent]. We will not send you marketing information from third parties without your consent.
- To update your contact details, where you have provided them to us Contract, Legal Obligation, Legitimate Interest (to keep our records updated).
- To meet our contractual commitments to you Contract.
- To notify you about any changes to our website, such as improvements or service/product changes, that may affect our service Legitimate Interests (for

running our business, provision of administration and IT services, network security, to develop our products/services and grow our business).

#### **International Transfers**

We share your personal data within the Blake Group. This will involve transferring your data outside the UK.

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

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

- We transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- In some cases we may use standard contractual clauses (SCCs) or a model international data transfer agreement (IDTA).

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

# **Marketing Communications**

We only use your data for the purposes set out in this statement. If you have requested information from us or purchased services from us, we may send you information we think may be of interest to you, such as electronic or postal newsletters, monthly offers, updates or reminders about any changes happening at Blake Emergency Services, unless you have opted out of receiving this information. You may opt out of these communications at any time by clicking the unsubscribe link at the end of our marketing emails or by contacting us. No contact details will be passed to third parties without the explicit permission of anyone who provides their contact details.

### Who is your personal data shared with?

We only disclose personal data where necessary to deliver our services. This may be with:

• any member of our group (including, where applicable, our subsidiaries or associated companies some of which may be situated outside the UK).

- third parties where we are legally required to disclose your information, for example, HMRC, regulators and other authorities, or to assist fraud protection
- to our professional advisers who are bound by obligations of confidentiality;
- to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.
- service providers acting as processors based in Czech Republic and Malaysia who may provide [IT, call centre, and system administration services]

Otherwise, no details you provide us with will be passed on to third parties and we do not share your information with third parties for marketing purposes. 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.

# How do we keep your personal data safe?

Data that is provided to us is stored on our secure servers. Any data, such as personal contact details which you submit to us via our 'Contact Us' form, will be stored and password protected on our internal database. By submitting your personal data, you agree to its transfer, storing or processing. We will take all reasonable steps to make sure that your data is treated securely and in agreement with this Privacy Policy. Please remember that the transmission of information via the internet is not completely secure. Therefore, while we make every effort to protect your personal data, we cannot guarantee the security of data sent to us electronically, and you do so at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

# How long will you use my personal data for?

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.

In some circumstances you can ask us to delete your data: see 'Your Rights' below for further information.

### **Use of Cookies**

We sometimes gather information regarding your computer whilst you are on our website. Google Analytics uses cookies for this purpose. This enables us to improve our services and to provide statistical information regarding the use of our website. Such

information will not identify you personally. It is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever. We may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

# **Third Party Links**

You may find links to third party websites plug-ins and applications on our website. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Some of the personal data they collect may be processed outside the UK. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

# **Your Rights**

If you have a complaint about the way we handle your personal data we would appreciate the chance to deal with your concerns so please contact us in the first instance. However, you do have the right to contact the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk) at any time.

Data Protection Legislation gives you the right to request access to, correction of, or erasure of the information that we hold about you. You may also object to or request restriction of processing of your personal data. You may request transfer of your personal data and if we are processing your data bases on Consent you can withdraw your consent at any time. If you wish to exercise any of the rights set out above, please contact us.

For more details on your data protection rights, we recommend you refer to the guidance published by the UK's Information Commissioner's Office at: https://ico.org.uk/

The accuracy of your personal data is important to us. For example, if you change email address or you think that any of the data we hold is inaccurate or out of date, please contact us.

You will not normally 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.

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.

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.