

Privacy Policy

We are committed to preserving the privacy of all visitors to our websites, at www.norwal.co.uk and www.norwal.training (the 'Websites'). Please read the following privacy policy to understand how we use and protect information that you provide to us. By using our Websites, you agree to the collection, use and disclosure of your information under the terms of this policy, except where this is explicitly forbidden by relevant legislation particularly, but not exclusively, the General Data Protection Regulations (GDPR). Please note that if you follow a link from our Website to another site, this policy will no longer apply. We are not responsible for the information handling practices of third party sites and we encourage you to read the privacy policies appearing on those sites.

1. Who we are

We are Norwal Limited, a company registered in England and Wales with company number 6279034, whose registered office is at The Old Post Office, Rhiwlas, Bangor, Gwynedd, LL57 4EP, United Kingdom (the 'Company'). The Company's controller and data protection officer is Jon Carter. You may write to him at the above address or contact him by email at enquiries@norwal.co.uk or by telephone on 01248 665060 if you have any queries about the information we hold on you.

2. How we collect information

2.1 We may collect information about you from your completion of our on-line forms or from any email you send to us.

2.2 We may collect information about you if you contact us offline, for example by telephone, facsimile or post.

2.3 We may obtain a record of site statistics about use of our Websites, but not in a format that identifies any individual.

2.4 Our goods and services are intended to be provided to persons who have reached the age of 16 years. Declarations of age at checkout or on booking forms will be treated in good faith unless the Company has reason to believe they are false. Orders for goods will not be accepted from persons under 16 years of age. Course bookings for persons under 16 years of age will require the consent of a person holding parental responsibility.

3. What we use your information for (purpose of processing and legitimate interests)

3.1 We will use your information to provide you with any further details or information you request when you contact us.

3.2 If we provide an online shopping service we will use your information to fulfil your order.

3.3 If we provide training courses, we will use your information to maintain records of attendance, issue certification ourselves or provide information to awarding organisations so that they can issue certification.

3.3.1 Regulated qualifications awarded by Qualsafe Awards require us to collect your name, date of birth and gender for the purposes of checking identity, maintaining the security of the award of qualifications and allowing Qualsafe Awards to identify learners who request certification to be re-issued, especially in cases where a learner changes their name and wants this changed on a certificate. Qualsafe Awards also require us to collect your email address to enable them to issue e-certification. Qualsafe Awards maintain learner records indefinitely for the purposes of meeting with regulatory requests for information, regulatory audit activity and responding to certificate verification requests.

3.3.2 RYA courses may require us to register your qualification with them online. On successful completion of your course your name, contact details, date of birth, certificate number and date of issue will be shared with the RYA through a secure web portal on www.rya.org.uk. The data will be stored on the RYA's central database. This information allows the RYA to record your qualification, to update any records they may hold for you, and to verify or replace your certificate if required. For further information on how the RYA will deal with your data, please see the RYA's [privacy policy](#). Where we issue your RYA certificate directly, on successful completion of your first aid, navigation or diesel engine course your name, certificate number and date of issue will be stored for up to seven years. This information allows us to verify or replace your certificate if required.

3.3.3 NNAS courses require us to provide your personal information for the purposes of registration and issuing awards. For Navigator Awards, this information is stored in their candidate management system. For Outdoor Discovery Awards, this information is held internally by NNAS. For more information, please refer to the NNAS Candidate Information Notice which is available on our website.

3.4 If we provide access to online and/or interactive training courses we use your data to register you as a learner with the online and/or interactive training provider. This particularly applies to Royal Yachting Association (RYA) online training courses. To enable access to your online course we need to share some of your personal data with the RYA via your user profile in www.ryainteractive.org. The learning management website is hosted and maintained by a third party called Learning Pool, who will not use your personal information for any reason other than enabling your course. Your name and email address will be entered on www.ryainteractive.org in order to create your user account. On your first access to the site, you will be asked to enter your address and date of birth. You will have access to the site for one year in order to complete your online course. During this period, your personal information will be held on the website by Learning Pool and be available to this training centre and the RYA for the purpose of managing your course. Instructional support will be provided by this training centre for a period of one year from the date of your course booking. On completion of your course, your name, email, date of birth and address will be transferred to the RYA's central database for the purpose of recording details of the course and any certification you gain as a result of it. This information allows the RYA to record your certification, to update any records they may already hold about you or your qualifications and to verify your certificate if required. After one year from the date of your enrolment on the course, your user account will be removed from www.ryainteractive.org. Full details of how the RYA will deal with your personal information will be displayed when you first access www.ryainteractive.org. For the duration of your access to the site, your data will be held in accordance with the [RYA interactive data policy, terms and conditions](#). If you receive a digital certificate downloaded from the RYA interactive site on completion of the course, your name, address, date of birth and certificate details will be transferred to the RYA database and held in accordance with the RYA's [privacy policy](#).

4. Our lawful bases for processing personal data

4.1 Most of our data collection and processing will be done with your specific and informed consent in accordance with Article 6(1)(a) of the GDPR. We will clearly state on our online forms why we are collecting information from you and what it will be used for.

4.2 If you are submitting a course booking or purchasing from our online shop, we need to collect and process data in order to be able to enter into a contract with you and to perform the contract. These arrangements fall within Article 6(1)(b) of the GDPR.

5. With whom we may share your data (recipients of personal data)

5.1 We will not share your information with any other organisation except in the following circumstances.

5.1.1 We will give third party providers who supply services to us (for example, as part of hardware or software maintenance) or who process information on our behalf (such as a hosting company) incidental access to your information.

5.1.2 We will disclose your information to enforcement authorities if asked to do so, or to a third party in the context of actual or threatened legal proceedings.

5.1.3 If we provide an online shopping service, any credit or debit card details you supply will be passed to our payment provider and your card issuer.

5.1.4 We may share your information with another organisation which buys our business or our assets or to whom we transfer our agreement with you and in the course of any negotiations, which may or may not lead to such a transfer or sale.

5.1.5 We may share your information with Awarding Organisations with whom we are affiliated for the purposes of course registration, quality assurance and certification.

5.1.6 Specifically for RYA online courses, to enable access to your online course we need to share some of your personal data with the RYA via your user profile in www.ryainteractive.org. This learning management website is hosted and maintained by a third party called Learning Pool, who will not use your personal information for any reason other than enabling your course.

6. Transfers outside the EEA

We will not transfer your information outside the EEA. The EEA comprises certain countries within Europe (including the EU) which have similar laws on data protection. Other countries outside the EEA may not give the same level of protection to your information.

7. Storage & retention of information

7.1 Your information will be stored on a web server and we will keep our own backup copy. We may also store your information on paper at our offices.

7.2 We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage.

7.3 Your information will be retained for the following periods of time:

7.3.1 For sales of goods, twelve months or the guarantee period of the goods, whichever is the longer

7.3.2 For training courses not leading to certification, twelve months

7.3.3 For training courses and/or assessments leading to certification that is not subject to an expiry date, twelve months

7.3.4 For training courses and/or assessments leading to certification that is subject to an expiry date, until the expiry date of the certificate.

8. Your Rights

The GDPR provides eight rights for individuals, covered in 8.1 to 8.8 below.

8.1 The right to be informed – this privacy policy is compliant with GDPR requirements about the information that we must supply to you.

8.2 The right of access – you have the right to confirmation that your data is being processed, the right of access to that data and the right of access to supplementary information. We must provide this information free of charge unless your request is manifestly unfounded or excessive, when we can charge a reasonable fee based on the administrative cost of providing the information. We aim to respond to subject access requests immediately but will always respond within one month of receipt unless requests are complex or numerous, when we have up to three months to provide the information. If we need this extended period of time, we will write and explain why within the first month. We will use reasonable means to verify the identity of the person making the subject access request before providing personal data.

8.3 The right to rectification – you have the right to have the personal data we hold about you rectified if it is inaccurate or incomplete. If we have passed your information to a third party, we will endeavour to inform them of this rectification wherever possible and tell you to whom we have disclosed your personal data. We will respond to your request for rectification immediately but will always respond within one month of receipt unless requests are complex, when we have up to three months. If we decide not to take action in response to your request for rectification we will explain our reason to you. In this case, you would have the right to complain to the supervisory authority if you felt that our actions were incorrect.

8.4 The right to erasure – you have this right in the following circumstances:

8.4.1 *where the personal data is no longer necessary in relation to the purpose for which it was collected and/or processed* – this aspect is covered in section 7.

8.4.2 *when you withdraw consent* – you have the right to withdraw your consent to us collecting and processing your information for certain purposes, including marketing and communications. The information that you provide for course bookings which is used for the purposes of certification is not covered by this provision because it is a necessary part of certification. If you fail to provide the personal data required for certification, the Awarding Organisation may refuse to issue a certificate. The Company shall not be liable where clients fail to provide the required personal information.

8.4.3 *when you object to the processing and there is no overriding legitimate interest for processing to continue.*

8.4.4 *where the personal data was unlawfully processed.*

8.4.5 *where the data has to be erased to comply with a legal obligation.*

8.5 The right to restrict processing – we will restrict processing your data, for example if you raise an objection or dispute its accuracy, until such time that we can verify accuracy and legitimacy to continue processing.

- 8.6 The right to data portability – our processing is not automated; therefore, this right is not applicable.
- 8.7 The right to object – you can object to the Company using your personal data for direct marketing purposes. While you can object to data processing in relation to course bookings, sub-section 8.4.2 will apply.
- 8.8 Rights in relation to automated decision making and profiling - the Company does not use automated decision making or profiling as part of its use of personal information.
- 8.9 You have the right to lodge a complaint with a supervisory authority. In the UK, the appropriate supervisory authority is the Information Commissioner's Office.

9. Cookies.

- 9.1 We may use 'cookies' to allow us to improve the experience of visitors to our website. Cookies are small text files which are transferred from this Website and stored on your computer's hard drive. They enable a Website to "remember" who you are.
- 9.2 Most browsers are automatically set to accept cookies but if you are using Microsoft's Internet Explorer or Netscape Navigator, you should be able to configure your browser to restrict cookies or block all cookies if you wish. This may, however, affect your ability to log into and use certain areas of our site.
- 9.3 We use session cookies to keep track of your session when you use our Website. If we provide an online shopping service, we will use session cookies to remember what is in your shopping basket. Session cookies are deleted when you close your browser. We do not use persistent cookies which remain on your browser until you delete them. No cookies on our site are served or used by third parties. We do not use "spyware", that is web bugs or hidden identifiers or other similar devices to gain access to information, store hidden information or to trace activities of users.

10. Further Information

- 10.1 If you have any queries about the information we hold on you or would like to exercise your rights set out above, please contact us by email on enquiries@norwal.co.uk.
- 10.2 Norwal Limited is entered in the Register of Data Controllers with registration no. Z3044661.
- 10.3 Further information about data protection issues including the online Register of Data Controllers can be found at www.ico.gov.uk