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## COMMERCIAL PRIVACY NOTICE

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### BACKGROUND:

Back to Life Limited takes your privacy very seriously and understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Back to Life Limited is the data controller and is responsible for your personal data. We have appointed a Data Protection Officer who is responsible for this privacy notice. If you have any questions about this notice, please contact the Data Protection Officer who is responsible for overseeing any questions in relation to this privacy notice.

### 1. Information About Us

Back to Life Limited is a company registered in England under company number 04410083. Our Registered address is 125 Woodlands Road, Little Bookham, Surrey, KT23 4HN. The Company's VAT number is 689295660.

The person responsible for Data Protection is Joanna Lawrence.

Email address: [jo@backtolife.co.uk](mailto:jo@backtolife.co.uk)

Telephone number: 01372 361 206

Registered address: 125 Woodlands Road, Little Bookham, Surrey, KT23 4HN

Trading address: Regus, 2 Guildford Business Park, Guildford, Surrey, GU2 8XG

We are regulated by the [Resuscitation Council UK](#) and certain individuals within the Company are required to adhere to the Standards Framework by the [Nursing & Midwifery Council](#).

### 2. What Does This Notice Cover?

This Privacy Notice explains how we use your personal data to deliver the services you have requested from us: how it is collected, held, and processed. It also explains your rights under the law relating to your personal data.

### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.



The personal data that we use is set out in Part 5, below.

#### 4. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.

- a) The **right to be informed** about our collection and use of your personal data.
- b) The **right to access** the personal data we hold about you, commonly known as a data subject access request. This enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it. Part 10 below will tell you how to do this.
- c) The **right to have your personal data rectified** if any of your personal data held by us is inaccurate or incomplete. This enables you to have any data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- d) The **right to be forgotten**, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. You have the right to ask us to delete personal information about you where you consider that we no longer require the information for the purposes for which it was obtained.
- e) The **right to restrict** (i.e., prevent) the processing of your personal data.
- f) The **right to object** to us using your personal data for a particular purpose or purposes, such as for direct marketing purposes.
- g) The **right to withdraw consent**. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The **right to data portability**. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) **Rights relating to automated decision-making and profiling**. We do not use your personal data in this way.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the [Information Commissioner's Office](#) (ICO). We would welcome the opportunity to resolve your concerns ourselves, however, so please do contact us first and we will be happy to assist you and address your concerns.



**5. What Personal Data Do You Collect and How?**

Depending upon your use of Our Site and Services, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods described. We do not collect any ‘special category’ or ‘sensitive’ personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), personal data relating to children or data relating to criminal convictions and/or offences (unless this is required for recruitment purposes).

**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 an answer to an enquiry). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

Data Collected	How We Collect the Data
<b>Identity</b> Information including first and last name.	Direct Interactions where you may give us your identity, contact and professional data etc. by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you submit an enquiry, request marketing information to be sent to you or when you engage our services.
<b>Contact</b> information including address, email and telephone numbers.	
<b>Business and Professional</b> information including business name, job title/profession for providing services.	
<b>Payment information</b> including bank account numbers, sort codes and name on the account for processing payments for services.	
<b>Records of correspondence</b> with you related to the provision of our services and information we have received from other sources, such as publicly available information or information provided by other trusted sources.	

For the purposes of recruitment, the Company collects and processes a range of personal information about you, should you apply for a role. Personal data means any information about an individual from which the person can be identified. This includes:

- Personal contact details, such as your name, title, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers;



- information about your remuneration, including entitlement to benefits such as pensions;
- information about your entitlement to work in the UK.

The Company collects this information in a variety of ways during the application and recruitment process. For example, data may be contained in application forms and CVs, obtained from identity documents, such as your passport and collected through interviews and assessment tests.

In some cases, the Company collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including on your application record, and in other IT systems (including the Company's email system).

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you for the purpose of administering a Training session;
- 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;
- Where we need to comply with a legal or regulatory obligation with the Resuscitation Council UK or our obligations under an employment contract;
- Where we need to process data to enter into an employment contract with you and to meet our obligations under that employment contract;
- Where we need to process such data from job applicants to enables the Company to manage the recruitment process, assess the suitability of candidates and make informed decision as to whom we wish to recruit.

The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business and supplying our services to you.	Identity information Contact information Business information Payment information Records of correspondence	Necessary for our legitimate interests or to comply with our legal obligations for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or restructuring exercise.



Communicating with you to respond to your enquiry submitted on our website, by phone, email, telephone or post.	Identity information Contact information Business information Records of correspondence	Respond to your request for information and for the performance of a contract with you.
Process financial transactions or manage payments for services.	Identity information Contact information Business information Payment information Records of correspondence	Performance of a contract with you.
Personalising and tailoring our services for you to make recommendations that may be of interest.	Identity information Contact information Business information Records of correspondence Marketing & Communications	Necessary for the legitimate interests to develop and grow our business and services.
To comply with legal and regulatory requirements, such as complying with the Resuscitation Council UK's Code of Conduct and Practice.	Identity information Contact information Business information	Necessary to comply with our legal and regulatory obligations.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reasons for which it was first collected. We will only retain your personal data for as



long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, financial, or reporting requirements.

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically six years. To ensure compliance with all such requirements it is the policy of Back to Life Limited to retain all data for a period of seven years from the end of the period concerned.

If you have applied for a role with the Company and your application for employment is unsuccessful, the Company will hold your data on file for 6 months after the end of the recruitment process. At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and we shall issue a new privacy notice which sets down the periods for which your data will be held.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We will primarily store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

However, there may be times where we will store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR, and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We may also store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We may store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful



destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. Do You Share My Personal Data?

We will not share or sell any of your personal data with any third parties for any purposes, subject to the following exceptions.

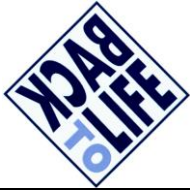
If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to provide specialist services as required. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

Recipient	Activity Carried Out	Sector	Location
Dropbox International – Data Processor.	Cloud based technology providing storage of files, documents, photos, comments, messages etc and tools for a smarter way of working across multiple devices and services securely.	IT	United States
Google Drive – Data Processor	Cloud based file storage and synchronisation service across devices and share files.	IT	United States
Microsoft OneDrive – Data Processor	Cloud based technology providing file storage and synchronisation service across devices and share files.	IT	United States



Xero Limited – Data Controller	A global online cloud-based platform providing accountancy & payroll processing software.	IT	New Zealand & United States
Mad About Book-Keeping Limited – Data Processor	Outsourced Payroll service provider for start to finish payroll processes	Professional Services	United Kingdom
Green Cloud Hosting Limited – Data Processor	Outsourced IT service provider for cloud-based desktop hosting and AWS.	IT	United Kingdom
Act! Software Limited – Data Processor	Cloud based customer relationship management software application / database for keeping track of client details safely and securely.	IT	United Kingdom & United States
Arlo Training Management Software	Cloud based training management software for scheduling courses, registering candidates, storing candidate activity and issuing/storing certificates	IT	European Economic Area (the “EEA”), the United States, Australia, and New Zealand and in other countries and territories
DittonHR Ltd. – Data Processor	HR consultancy service providing support on HR related matters including recruitment, disciplinaries, grievances, statutory sick pay, family leave & pay, sickness & absence management & pay etc.	Professional Services	United Kingdom

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.





**10. How Can I Access My Personal Data?**

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown below. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**11. How can I access and update my information?**

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to us, or call us using the ‘Contact information’ noted below.

You have the right to ask for a copy of the information Back to Life Limited holds about you.

**12. 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.

Back to Life Limited 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. Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make every effort to ensure it is secure on our systems. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.



If you think that any part of our process is not secure, please email our Data Protection Officer – Joanna Lawrence.

### 13. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of our Data Protection Officer – Joanna Lawrence:

Email address: [jo@backtolife.co.uk](mailto:jo@backtolife.co.uk)

Telephone number: 01372 361 206

Registered Address: 125 Woodlands Road, Little Bookham, Surrey, KT23 4HN

Trading address: Regus, 2 Guildford Business Park, Guildford, Surrey, GU2 8XG

### 14. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website or you may contact us for a copy to be sent to you directly.

This Privacy Notice was last updated on 23 August 2023.