

## CONTRACTOR PRIVACY NOTICE

Policy last updated: November 2024

Review date: August 2025

**Data controller:** North Lancs Training Group (NLTG)

**Person responsible for Data protection:** Gareth Lindsay (Managing Director)  
[gareth.lindsay@nltg.co.uk](mailto:gareth.lindsay@nltg.co.uk)

### Scope:

North Lancs Training Group collects and processes personal data relating to its contractors to manage its relationship with them. NLTG is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does NLTG collect?

NLTG collects and processes a range of information about you. This may include:

- your name, address and contact details, including email address and telephone number;
- the terms and conditions of your engagement as a contractor;
- details of your qualifications, skills, experience and career history, including start and end dates;
- information about your remuneration and expenses, including details of the services and the days and hours on which you provide services under your contractor engagement;
- details of your bank account and VAT registration details;
- the duration of any periods during which you are unable to provide the services under your contractor engagement; and
- emergency contact details.

NLTG collects this information in a variety of ways. For example, data is collected through CVs or resumes; from forms completed by you at the start of or during your engagement; from correspondence with you; or through interviews or other meetings.

Data is stored in a range of different places, including in the companies HR / Account management systems and in other IT systems (including when applicable in the companies email system).

### Why does NLTG process personal data?

NLTG needs to process data to enter into a contractor engagement with you and to meet its obligations under the contractual arrangements between us. For example, it needs to process your data to provide you with a contractor agreement and to pay you in accordance with the contract.

In other cases, NLTG has a legitimate interest in processing personal data before, during and after the end of the contractor engagement. Processing contractor data allows the company to:

- offer contractor engagements to appropriate and suitably qualified individuals;
- maintain accurate and up-to-date records and contact details (including details of who to contact in the event of an emergency), and records of contractual rights and obligations;
- operate and keep a record of hours to allow effective workforce management;
- ensure effective general HR and business administration;
- ensure health and safety compliance; and
- respond to and defend against legal claims.

Where NLTG relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of contractors and has concluded that they are not.

### **Who has access to data?**

Your information will be shared internally, including with members of the HR team and accounts team, your primary point of contact in the company, managers in the business area to which you provide services and IT staff if access to data is necessary for performance of their roles.

NLTG shares your data with third parties that process data on its behalf in connection with making payments.

NLTG will not transfer your data to countries outside the European Economic Area.

### **How does NLTG protect data?**

NLTG takes the security of your data seriously. NLTG has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where NLTG engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **For how long does NLTG keep data?**

NLTG will hold your personal data for the duration of your engagement as a contractor. The periods for which your data is held after the end of your engagement are one year from the last date of payment.

## Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require NLTG to change incorrect or incomplete data;
- require NLTG to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where NLTG is relying on its legitimate interests as the legal ground for processing; and
- ask NLTG to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the company's legitimate grounds for processing data.

If you would like to exercise any of these rights, details are available in its Data Protection Policy. You can make a subject access request by completing [NLTG form for making a subject access request](#) available via the website or in company.

If you believe that NLTG has not complied with your data protection rights, you can complain to the [Information Commissioner](#).

## What if you do not provide personal data?

You have some obligations under your contractor engagement to provide NLTG with data. In particular, you may be required to report periods during which you are unable to provide services and may be asked to provide details of the insurance policies you maintain in accordance with your contractor engagement.

Certain information, such as contact details and payment details, have to be provided to enable NLTG to enter into a contractor engagement with you. If you do not provide other information, this will hinder NLTG's ability to administer the rights and obligations arising as a result of the contractor engagement efficiently.



**CONTRACTOR PRIVACY NOTICE**

**SIGN OFF PAGE**

**NORTH LANCS TRAINING GROUP LTD**

**NAME: ..... (please print)**

**I have received a copy of NLTG's Contractor Privacy Notice issued NL0553 (Issue3) and acknowledge all contents within**

**Signed .....**

**Date: .....**

**Please return to your lead contact at NLTG prior to formal engagement with the company**