

TTC GROUP PRIVACY NOTICE – CPC TRAINING

1. GENERAL

TTC Group is committed to complying with data privacy legislation, including the UK General Data Protection Regulation and the Data Protection Act 2018. Looking after the personal information you share with us is very important to us, and we want you to be confident that your personal information is kept safely and securely. We also want you to understand how we may use personal information we collect before, during and after your relationship with us, how we comply with the law on data protection and what your rights are.

2. WHO THIS NOTICE APPLIES TO

This privacy notice applies to you if you are an individual undertaking a CPC training session delivered by TTC Group or one of its subsidiary organisations.

References to **you, your** and **yourself** in this privacy notice are to either you as an individual or any organisation that you work for.

We may make changes to this notice from time to time, and if we do make changes, we will update this page with the new version. Therefore, please check this page occasionally to ensure that you're happy with any changes. For significant changes to this notice, we will try to give you reasonable notice unless we are prevented from doing so or unable to do so.

This notice was last updated on 19 March 2026.

3. WHO WE ARE

References to **we, our** or **us** in this privacy notice are to the **TTC Group** (being TTC Group (UK) Limited, a limited company incorporated in England and Wales with registered number 06214074 and with its registered office at TTC Hadley Park, Telford, Shropshire, TF1 6QJ and each of its direct and indirect subsidiaries, trading under the "TTC" brand).

TTC Group is a registered data controller – ICO registration ZA272769.

We have appointed a Data Protection Officer to oversee our compliance with data protection laws. Contact details for our DPO are set out in the "**Contacting us**" section at the end of this privacy notice.

For the purposes of data protection, except where we act as a processor only, the company in our Group which is processing your personal information will be the controller of your personal information.

To view TTC Group's full Privacy Notice for all services provided, please click here - <https://www.thettcgroup.com/privacy-policy/>

4. PERSONAL INFORMATION WE COLLECT

We may collect the following types of personal information about you:

- Contact details
 - Name
 - Address
 - Telephone number
 - Email address
- Photographic image of drivers (remote delivery only to evidence attendance)
- Driver licence details
 - Photographic image of entitlements
 - Driving licence number
- Payment details
- CCTV (if applicable)

5. SPECIAL CATEGORIES OF PERSONAL INFORMATION AND CRIMINAL OFFENCE INFORMATION

We may collect, store and use the following “special categories” of more sensitive personal information about you, but only if this is needed in order to make any arrangements to accommodate your specific requirements:

- information about your race or ethnicity or your religious or philosophical beliefs;
- information about your health, including any medical condition (including mental health conditions).

6. SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM

We will collect personal information from a number of sources. These may include the following:

- **Directly from you:** when you complete forms we provide to you or when you populate your information on to any of our platforms or systems, or provide information to us through our website (including via our portals) or applications or on the site of one of our partners. If you make a complaint, contact us by phone, email or communicate with us directly in some other way or you enter an area covered by a CCTV system that we operate.
- **Providers of information:** which may include professional bodies or trade associations, such as the Driver and Vehicle Licensing Agency (DVLA), the Driver and Vehicle Agency Northern Ireland (DVANI), the Driver and Vehicle Standards Agency (DVSA).
- **Your employer or the organisation you work for or authorised users of our products and/or services:** they may provide us with your name, position contact details and background information about you in connection with us providing our products and/or services to them or you.

We will also collect additional personal information throughout the period of our relationship with you.

If you are providing information regarding other individuals to us, it is your responsibility to ensure that you have the right to provide the information to us.

If you are providing us with details about other individuals, they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

7. OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

For the provision of providing driver CPC courses our lawful basis for processing this data is the legal obligation under Vehicle Drivers (Certificates of Professional Competence) Regulations 2007. This is our primary basis for processing your information however there may be other basis that apply such as:

- Where we need to perform the contract we have entered into with you or your employer.
- Where we need to comply with a legal obligation which applies to us, for example complying with health and safety laws for visitors to our premises or events, data protection laws, money laundering laws or financial regulation that applies to our activities.
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. This for example will cover use of your personal information if you are a user of or are monitored by our products and/or services or if you work for a supplier or customer of ours, and we need to use your details to contact the supplier or customer you work for or to perform a contract with them. It would also cover our interest in managing our business, for example, to allow us to provide products and/or services to our customers and to obtain products and/or services from our suppliers and would cover our use of your personal information to assist third parties (such as our customers or suppliers) to comply with their legal obligations. It also covers our monitoring and facilitating your use of our products/and or services, including for security reasons. Our need to monitor and manage our relationship with you (including contacting you, responding to your queries or complaints). Legitimate interests also covers most CCTV systems as it is a legitimate interest to protect against crime and other misconduct.
- Where you have given your consent. For example, you may expressly provide your consent or your consent may be given due to you having signed up to take part in one of our courses.

In some cases more than one legal basis may apply to our use of your personal information.

8. WHAT WE USE YOUR PERSONAL INFORMATION FOR

The points below describes the main purposes for which we may process your personal information:

- send you details of the course
 - pay for the course
 - confirm your identity
 - attend the course
 - Issue of an attendance certificate
 - Recorded online courses are used for quality assurance and monitoring purposes
 - Upload completed periodic training hours on the Government's Recording and Evidencing (R&E) database; you can find out more about how your data is used on the database at Personal information charter - Driver and Vehicle Standards Agency - GOV.UK
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- We also need to monitor and manage our relationship with you, which may involve communications with you, decisions regarding your relationship with us and in some cases meeting with you. We also need to use your personal information in order to comply with a request from you in the exercise of your rights.
 - We may need to process your personal information to help train our staff, and make sure they deliver the high standards expected in relation to our business.
 - As a business we may have many legal obligations connected to our relationship with you or connected to visiting our premises which we need to comply with, for example, to comply with data protection laws or to comply with health and safety laws so we can ensure it is safe for you to visit our premises. Compliance with these legal obligations may require us to process your personal information.
 - You may have contacted us about a query, complaint or enquiry and we need to be able to respond to you and deal with the points you have raised.
 - To manage and keep a record of our relationship with you and any associated information.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or we are legally permitted to use it for another purpose. If we need to use your personal information for an unrelated purpose, we will notify you by updating this privacy notice on our website, so please check back regularly for any updates.

9. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share personal information with the following parties:

- **The Driver and Vehicle Standards Agency (DVSA) and/or the Driver Vehicle Agency (DVA)** for the purpose of managing and monitoring approved training providers and periodic training courses, where necessary shared with member state authorities to confirm Driver CPC entitlement abroad.

- It may also be shared with **Competence Assurance Solutions (CAS)**, who conduct audits on behalf of the Competent Authorities to ensure ongoing quality assurance and compliance with regulatory standards. DVSA use an external company called Competence Assurance Solutions (CAS) for the purposes of auditing a training provider.
- **Internally with our staff:** including with our managers, legal teams and senior staff in the business area involved in your relationship with us, where access to your personal information is necessary for the performance of their roles.
- **Other companies in our supply chain:** this is if we use a contractor to deliver the services to you.
- Anyone you ask us to pass or consent to us passing your information to: for example, your employer (see below).
- **Our customers (which may be your employer):** we may for example provide your personal information to your employer or your employer's personnel (including personnel who are authorised to use, access and interact with our products and/or services on behalf of our customer) when we have entered into a contract to provide services to them (this may be, for example, when we report on your training attendance or completion).

10. AUTOMATED PROCESSING AND DECISION MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision about that person without any human intervention, which produces legal effects concerning them or similarly significantly affects them. We do not currently use this type of automated decision-making in our business in relation to you. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

11. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

In most circumstances, information you provide to us is stored on our suppliers', secure servers, which are located within the UK and European Economic Area (EEA).

However, in limited circumstances the people to whom we may disclose personal information as mentioned in the "**Who we share your personal information with**" section above may be located outside of the UK and EEA and as a result, the personal information we collect may be transferred to and stored in countries outside of the UK and the EEA.

There may not be an adequacy decision in place in relation to some of the jurisdictions outside of the UK and EEA and they may require different levels of protection in respect of personal information. In certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed. We will also take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your personal information on our behalf, we will put in place appropriate safeguards as required under data protection laws. Our standard practice is to

assess the laws and practices of the destination country and relevant service provider and the security measures that are to be taken as regards the personal information in the overseas location; alternatively, we use standard data protection clauses. This means that when a transfer outside of the UK or EEA takes place you can expect a similar degree of protection in respect of your personal information. For further details please contact us by using the details set out in the “**Contacting us**” section below.

12. DIRECT MARKETING

By default, we do not use your data for any marketing purposes, nor do we sell, share or rent any of your data to any third parties for marketing purposes.

We will only contact you for marketing purposes if you have asked us to do so. You can let us know at any time that you do not wish to receive further marketing messages by sending an email to us at yourdata@ttc-uk.com or by using the details set out in the “**Contacting us**” section below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any electronic marketing messages we send to you.

13. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR

We will keep your personal information for as long as is necessary for the purpose for which it has been obtained and then for as long as there is any risk of a potential dispute or claim, which will be dependent upon the limitation period for the particular type of claim (typically either 6 years or 12 years). We have set out below the main retention periods which will apply:

- For individuals that we provide a direct service to, we are legally required to hold some types of information, for example data about your periodic training, to fulfil our statutory obligations for up to six years.
- For customer accounting information or other related information this will be for as long as we have a contract with that customer or supplier and then generally for a period of 7 years afterwards.
- For individuals whose images are captured during the video recording of online driver CPC courses it will generally be a period of 30 days.
- For individuals whose images are captured on a CCTV system operated by us it will generally be up to 30 days (after that time the recording media is generally overwritten) unless a request for access to the relevant CCTV images has been made to us during that period, in which case the relevant CCTV images will be retained for as long as they remain relevant. In the case of investigations, e.g. a criminal prosecution, that may be many years.

Whichever time period applies, we do not guarantee to retain your personal information for the whole of the periods set out above; they are usually the maximum period, and in some cases, we may keep your personal information for a much shorter period.

However where any personal information becomes relevant to legal proceedings or an investigation, then it may be retained for longer periods than those set out above and retained for as long as it remains relevant to the legal proceedings or investigation.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move position or work for a different organisation or change your phone number or email address. you can contact us by using the details set out in the “**Contacting us**” section below.

14. SECURITY

We have numerous security measures in place to protect the loss, misuse and alteration of information under our control, such as passwords and firewalls. We cannot, however, guarantee that these measures will protect information in all cases. We do, however, take information security very seriously and will use all reasonable endeavours to protect the integrity and security of the personal information we collect about you.

You should take all reasonable steps to keep your personal information secure, including choosing a secure password if you have an online account with us and not disclosing your passwords or username to anybody else.

15. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to withdraw any consent you have given to us in relation to our use of your personal information;
- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to object to us sending you direct marketing materials;
- the right to request that we transfer elements of your information either to you or another service provider in certain circumstances; and
- the right to object to certain automated decision making processes using your personal information.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner’s website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below. To obtain a copy of the personal information we hold about you, to request the erasure of your personal information or to request the correction of inaccurate personal information we hold about you, you can also complete or subject access request form <https://www.thettcgroup.com/privacy-policy/subject-access-request/>.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. For complaints to the Information Commissioner's Office, please see <https://ico.org.uk/make-a-complaint/>. However, we are here to help and we encourage you to contact us to resolve your complaint first. If you are based outside of the UK, you may have the right to complain to your local data protection regulator.

16. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you or in connection with this notice, please email our DPO at yourdata@ttc-uk.com or write to us at Attention of the Data Protection Officer, TTC Group (UK) Limited, Hadley Park East, Telford, TF1 6QJ. If you would prefer to speak to us by phone, please call 0330 024 1805.