



INITIATIVE
TRAINING GROUP

Privacy and Cookies Policy

How Initiative Training Group handles personal information

Version 2.2 | Effective 23 July 2026

The Initiative Training GP Limited

Company number 06204390
www.initiativetraininggroup.com

Document control

Field	Details
Policy owner	Managing Director
Version	2.2
Effective date	23 July 2026
Replaces	Privacy Statement dated July 2020 (renamed Privacy and Cookies Policy)
Review cycle	At least annually and whenever our services, systems or legal obligations materially change

In brief

We collect only the personal information needed to run our business, deliver consultancy, training, travel-risk and protective-security services, meet legal obligations and keep our systems secure. We do not sell personal information.

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1. About this Policy

This Policy explains how The Initiative Training GP Limited, trading as Initiative Training Group and Initiative Training Oracle, ("ITG", "we", "us" or "our") collects, uses, shares, protects and retains personal information. It also explains the rights available to individuals under UK data protection law.

It applies to information collected through our website, enquiries, proposals, contracts, consultancy assignments, travel-risk management, protective-security support, classroom and online training, events, supplier and consultant relationships, and other business communications.

This Policy has been prepared with reference to the UK General Data Protection Regulation, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the Privacy and Electronic Communications Regulations 2003, in each case as amended.

This is a public privacy and cookies policy. More specific privacy information may be provided where a particular activity requires it, for example a travel assignment, incident response, course registration or recruitment exercise. The specific notice should be read together with this Policy.

2. Who we are and when this Policy applies

Data controller. The Initiative Training GP Limited is the controller for personal information where we decide why and how it is used.

Data processor. Where a client supplies personal information and instructs us how to use it, the client may be the controller and ITG may act as its processor. In that situation, the client is primarily responsible for its privacy information and we process the information under the contract and the client's documented instructions.

This Policy also applies to ITG-branded online learning services and portals operated by us. It does not automatically apply to platforms or websites operated independently by third parties.

3. Personal information we collect

Depending on the service or relationship, we may collect the following categories of personal information:

- Identity and contact details, including name, job title, employer, postal address, email address, telephone number and emergency contact details.
- Business and contractual details, including enquiries, proposals, instructions, contracts, purchase orders, supplier records and professional correspondence.
- Travel and assignment information, including itinerary, transport, accommodation, destination, travel dates, passport or visa information where necessary, emergency arrangements and traveller preferences.
- Training information, including enrolment, attendance, assessment results, learning activity, feedback, certificates and communications with trainers or tutors.
- Financial and transaction information, including billing details, bank details, invoices, payment status and transaction references. Card details are normally handled by the relevant payment provider rather than retained by ITG.
- Technical and website information, including IP address, device and browser information, security logs, cookie choices and information about how our website or learning platform is used.
- Special category or other sensitive information where genuinely needed, as explained in section 6.

4. Where personal information comes from

We obtain personal information from:

- you directly, including through forms, emails, telephone calls, meetings, course registrations and service delivery;
- your employer, client organisation, sponsor, travel manager or another person arranging services on your behalf;
- consultants, subcontractors, travel providers, security partners and other operational contacts involved in an assignment;
- publicly available and professional sources, such as corporate websites, professional directories, official travel advice and public records; and
- our website, email, learning and information-security systems when you use them.

Where we obtain personal information from someone else, we will provide privacy information within the period required by law unless an exception applies or the relevant controller is responsible for doing so.

5. How and why we use personal information

We must have a lawful basis for each use of personal information. The main purposes and lawful bases relevant to ITG are set out below. More than one basis may apply to a particular activity.

Purpose	What this may include	Main lawful basis
Enquiries and proposals	Responding to enquiries, understanding requirements, preparing quotations and taking steps before a contract.	Steps at your request before a contract; legitimate interests in developing and administering our business.
Delivering services	Managing contracts and providing consultancy, training, travel-risk management, protective-security and related support.	Contract; legitimate interests in delivering and improving professional services; legal obligation where applicable.
Traveller safety and incident response	Planning assignments, communicating safety information, coordinating support and responding to incidents or emergencies.	Contract; legitimate interests in protecting people and operations; vital interests in a genuine emergency.

Purpose	What this may include	Main lawful basis
Training administration	Registration, attendance, learning access, assessment, quality assurance, certification and learner support.	Contract; legitimate interests in administering and improving training.
Finance and records	Billing, payments, credit control, tax, accounting, audit and insurance records.	Contract; legal obligation; legitimate interests in financial administration and fraud prevention.
Suppliers and consultants	Due diligence, contracting, deployment, payment, performance and compliance.	Contract; legal obligation; legitimate interests in operating a reliable supplier network.
Governance and legal protection	Complaints, rights requests, investigations, professional advice, dispute resolution and legal claims.	Legal obligation; legitimate interests in compliance and protecting legal rights.
Website and information security	Operating websites and portals, authentication, preventing misuse, maintaining logs and diagnosing faults.	Legitimate interests in secure and reliable systems; legal obligation where applicable.
Analytics and service improvement	Understanding service use, feedback, quality, demand and website performance.	Consent where required; legitimate interests or a statutory exception where law permits.
Marketing	Sending relevant information about ITG services, events, materials and updates.	Consent or legitimate interests, together with compliance with electronic marketing rules.

Providing information. Where information is needed to enter into or perform a contract, meet a legal requirement, protect a traveller or provide a requested service, failing to provide it may mean that we cannot proceed or may have to limit the service. We will explain this where it is not obvious.

6. Special category and security-related information

Travel, training and protective-security work can occasionally require information that receives additional legal protection. This may include health, disability, accessibility, dietary, religious or vulnerability information, particularly where it affects travel arrangements, personal safety or emergency support.

We collect and use this information only where it is necessary and proportionate. In addition to an ordinary lawful basis, we will identify an appropriate condition under data protection law, such as explicit consent, vital interests in an emergency, employment or social-protection obligations where relevant, or the establishment, exercise or defence of legal claims.

We do not routinely collect criminal offence information. Where vetting, legal requirements or a security assignment makes this necessary, we will only process it where authorised by law and with appropriate safeguards.

Operational security information may be restricted on a need-to-know basis. This does not remove an individual's rights, although legal exemptions may apply in limited circumstances.

7. Who we share personal information with

We may share personal information where necessary with:

- the client organisation, employer, sponsor or person who arranged or funded the service;
- ITG consultants, trainers and subcontractors who need the information to perform their duties;
- travel, accommodation, medical, assistance, security, communications and ground-support providers involved in an assignment;
- IT, cloud-hosting, email, customer-management, learning-platform, analytics and payment-service providers;
- professional advisers, insurers, auditors, accountants and legal representatives;
- awarding bodies, certification partners or quality-assurance organisations where relevant;
- government bodies, regulators, courts, law-enforcement agencies or emergency services where required or permitted by law; and
- a prospective purchaser, investor or successor if all or part of the business is reorganised, sold or transferred, subject to appropriate confidentiality and legal safeguards.

We require service providers acting on our behalf to protect personal information, use it only for the agreed purposes and comply with applicable data protection requirements. We do not sell or rent personal information.

8. International transfers

ITG works internationally and may use technology or operational partners located outside the United Kingdom. This means personal information may be accessed or transferred abroad where necessary for service delivery, traveller support or business administration.

Where the destination is not covered by UK adequacy regulations, we use an appropriate transfer mechanism where required, such as the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another lawful safeguard. We also consider the practical security of the transfer and limit the information shared.

Further information about safeguards relevant to a particular transfer is available on request, subject to lawful confidentiality and security restrictions.

9. How long we keep personal information

We keep personal information only for as long as necessary for the purpose for which it was collected, including contractual, legal, tax, insurance, security and dispute-resolution requirements. Typical periods are shown below and may be adjusted where circumstances justify it.

Record type	Typical retention period
Enquiries and unsuccessful proposals	Usually 24 months after the last meaningful contact.
Client contracts, project administration and final deliverables	Usually 6 years after completion or termination, unless a longer or shorter period is justified.
Operational itineraries, contact lists and sensitive traveller information	Kept for the shortest practical period, normally no more than 12 months after the assignment unless needed for an incident, contractual requirement, insurance matter or legal claim.
Training attendance, assessment and certification records	Usually 6 years after course completion, or longer where an awarding body, contract or legal requirement applies.
Invoices, accounts and tax records	Usually 6 years after the relevant accounting period or as otherwise required by law.
Supplier and consultant records	Usually 6 years after the relationship ends.
Marketing records	Until consent is withdrawn, an objection is made, or the contact has been inactive for 24 months, subject to a suppression record so that opt-outs are respected.
Website and security logs	Usually up to 12 months, unless needed to investigate a security event or legal issue.
Data protection requests and complaints	Usually 3 years after closure, or longer where needed to demonstrate compliance or manage a dispute.

When a retention period ends, information is securely deleted, destroyed or anonymised. Backup copies may remain for a limited period until they are overwritten in the normal cycle, with access restricted.

10. Security

We use proportionate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. Measures may include access controls, multi-factor authentication, encryption, secure backups, confidentiality obligations, supplier due diligence, staff or consultant briefings, device security and incident-response procedures.

Access is limited to people who need the information for their role. No system is completely immune from risk, but we review controls and respond to suspected incidents. Where a personal data breach is reportable, we will notify the Information Commissioner and affected individuals as required by law.

11. Marketing communications

We may send relevant information about ITG services, training, events and publications to business contacts and people who have asked to receive it. We rely on consent or legitimate interests as appropriate and comply with the Privacy and Electronic Communications Regulations.

Every electronic marketing message will provide a straightforward way to unsubscribe. You can also object at any time by contacting us. We may keep a minimal suppression record after an opt-out so that we do not contact you again by mistake.

Your right to object to direct marketing is absolute. Once you object, we will stop using your personal information for that purpose.

12. Cookies and online services

Our website and online services may use cookies and similar storage or access technologies. Essential technologies may be used to provide security, remember core settings, enable requested functions or maintain a session.

For analytics, advertising or other non-essential purposes, we will request consent where required. Where the law permits a limited exception, we will provide clear information and a simple way to object. Cookie choices can be changed through the website controls or browser settings, although disabling essential technologies may affect functionality.

Please see our Cookie Notice for details of the technologies actually used, their providers, purposes and duration.

13. Your data protection rights

Depending on the circumstances and lawful basis, you may have the right to:

- **Access:** ask whether we use your personal information and receive a copy, together with supporting information;
- **Rectification:** have inaccurate information corrected and incomplete information completed;
- **Erasure:** ask us to delete personal information where there is no lawful reason to keep it;
- **Restriction:** ask us to limit how personal information is used in certain circumstances;
- **Object:** object to processing based on legitimate interests and object at any time to direct marketing;
- **Data portability:** receive information you provided in a structured, commonly used, machine-readable format where the right applies;
- **Withdraw consent:** withdraw consent at any time where processing is based on consent, without affecting earlier lawful processing; and
- **Human review:** request safeguards where a decision with legal or similarly significant effects is made solely by automated means.

ITG does not currently make decisions about individuals solely by automated means where the decision produces legal or similarly significant effects.

To exercise a right, contact us using section 18. We may ask for information needed to verify identity and understand the request. We normally respond within one month, although the period may be extended where the request is complex or numerous. Rights are not absolute, and we will explain any lawful restriction or refusal. A fee is not normally charged, but a reasonable fee may apply to a manifestly unfounded or excessive request.

14. Data protection complaints

You may complain to ITG if you believe we have handled personal information incorrectly or failed to deal properly with a data protection request.

Complaints can be made by email, telephone or post using section 18. Please identify the matter as a "Data Protection Complaint" and provide enough information for us to understand what happened, the relevant dates and the outcome you are seeking.

We will:

- provide an accessible way to make a complaint;
- acknowledge receipt within 30 days;
- make appropriate enquiries and respond without undue delay;
- keep you informed if the matter takes longer to investigate; and
- tell you the outcome and any action taken.

You also have the right to complain to the Information Commissioner's Office. The ICO normally expects you to give the organisation an opportunity to resolve the concern first. Information is available at ico.org.uk or by calling 0303 123 1113.

15. Children

Our main services are directed at organisations and adults. We do not knowingly use children's personal information for marketing. If a person under 18 attends training or is included in a service, we will use only the information needed, apply additional care and obtain appropriate authorisation or consent where required.

16. Third-party links

Our websites, course materials and communications may link to third-party websites or services. Those organisations are responsible for their own privacy practices. We recommend reading their privacy information before providing personal information.

17. Changes to this Policy

We may update this Policy to reflect changes in law, guidance, technology or our services. The current version will be published on our website with its effective date. Material changes may also be brought to the attention of affected individuals where appropriate.

18. Contact us

For privacy enquiries, rights requests or complaints, contact:

Contact method	Details
Organisation	The Initiative Training GP Limited
Email	info@initiativetraininggroup.com
Telephone	01432 818999
Post	PO Box 134, Hereford HR1 9ET, United Kingdom
Website	www.initiativetraininggroup.com

End of Privacy and Cookies Policy