

Data Protection Statement

1. Purpose

TPMG is committed to handling personal data lawfully, fairly, transparently and securely.

This Data Protection Statement explains the principles TPMG applies when collecting, using, storing, sharing and disposing of personal data in the course of its business activities. It is intended to give clients, prospective clients, suppliers, partners, learners, website users and other stakeholders confidence that TPMG treats privacy and data protection as a core governance responsibility.

This reflects the approach taken in your example policies, which consistently treat data protection as both a legal obligation and a trust issue. The UK GDPR and related UK legislation require personal data to be processed lawfully, fairly, transparently, for specified purposes, in a data-minimised and secure way, and for no longer than necessary. (ico.org.uk)

2. Scope

This Statement applies to personal data processed by TPMG in connection with its website, enquiries, consultations, services, training, digital products, supplier relationships, recruitment activity, marketing and general business administration.

It applies to personal data in electronic, physical and verbal form, including where personal data is processed by authorised third parties on TPMG's behalf.

3. Our Commitment

TPMG is committed to:

- processing personal data only where there is a valid lawful basis;
- being clear about why personal data is collected and how it is used;
- collecting only the personal data needed for the relevant purpose;
- keeping personal data accurate and up to date where appropriate;
- retaining personal data only for as long as necessary;
- protecting personal data with appropriate technical and organisational measures;
- respecting individuals' rights under applicable data protection law; and
- reviewing and improving controls where risks, systems or processing activities change.

These commitments mirror the structure of your example materials, especially around lawful basis, minimisation, accuracy, retention, secure processing and accountability.

4. Data Protection Principles

TPMG's approach is guided by the core UK data protection principles. Personal data must be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept only for as long as necessary for the purpose for which it was collected; and
- processed in a manner that ensures appropriate security.

This is consistent with both your example policy wording and ICO guidance on the UK GDPR principles. (ico.org.uk)

5. Categories of Personal Data TPMG May Process

Depending on the relationship and service involved, TPMG may process personal data such as:

- identity and contact details;
- job title, employer and professional contact information;
- enquiry, consultation and correspondence records;
- training, course, learner or attendance information;
- billing, transactional or contract administration data;
- supplier, partner or subcontractor contact and due diligence information;
- website usage, cookie or form submission data;
- recruitment and applicant information; and
- information relevant to complaints, incidents, service delivery or legal/compliance obligations.

TPMG does not seek to collect more personal data than is reasonably necessary for the relevant purpose. Your examples place the same emphasis on collecting only what is needed and keeping records of categories, purposes, subjects, recipients, retention and security measures.

6. Lawful Bases for Processing

TPMG only processes personal data where there is a valid lawful basis to do so. Depending on the context, this may include:

- consent;
- performance of a contract or steps prior to entering into a contract;
- compliance with a legal obligation;
- protection of vital interests;
- legitimate interests, provided those interests are not overridden by the individual's rights and freedoms; or
- another lawful basis permitted by applicable law.

Where special category personal data is processed, TPMG expects an additional

condition for processing to be identified where required by law.

This reflects both your example documents and ICO guidance on lawful bases and special category processing. (ico.org.uk)

7. Purpose Limitation and Data Minimisation

TPMG collects and uses personal data only for specified business purposes and does not use personal data in ways that are incompatible with those purposes unless a further lawful basis applies.

We aim to ensure that personal data is:

- adequate for the relevant purpose;
- genuinely relevant to that purpose; and
- limited to what is actually needed.

Your examples and guidance notes repeatedly emphasise that holding personal data “just in case” is not appropriate, and that purpose, lawful basis and retention should be documented and reviewed together.

8. Accuracy and Data Quality

TPMG takes reasonable steps to keep personal data accurate and, where appropriate, up to date. Where inaccuracies are identified, we aim to correct, update, restrict or delete the relevant data as appropriate.

This is consistent with the approach reflected in your example materials and with the UK GDPR accuracy principle. (ico.org.uk)

9. Transparency and Privacy Information

TPMG aims to provide clear privacy information explaining:

- who we are;
- what personal data we collect;
- why we collect it;
- the lawful basis for processing;
- who we may share it with;
- whether it is transferred internationally;
- how long we keep it;
- what rights individuals have; and
- how to contact us or the ICO.

This reflects the privacy-notice expectations in your example audit and policy materials. ICO guidance sets out similar expectations for privacy information. (ico.org.uk)

10. Data Security and Confidentiality

TPMG applies appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Depending on the nature of the data, service and risk, these measures may include:

- access restriction on a need-to-know basis;
- secure systems, devices and authentication controls;
- appropriate confidentiality measures;
- secure storage, transfer and disposal arrangements;
- role-based permissions;
- staff awareness and training;
- proportionate monitoring, review and audit; and
- escalation arrangements for incidents, weaknesses or suspected misuse.

This is aligned with the security and data handling themes in your example files, which

emphasise need-to-know access, secure handling, review, confidentiality, storage limitation and organisational measures. UK GDPR also requires personal data to be processed securely using appropriate technical and organisational measures. (ico.org.uk)

11. Sharing Data with Third Parties

TPMG may share personal data with trusted third parties where necessary for legitimate business, legal or service-delivery purposes. This may include:

- IT, hosting and software providers;
- payment, training or service-delivery partners;
- professional advisers;
- regulators, authorities or law enforcement where required; and
- carefully selected processors or suppliers that support TPMG operations.

Where third parties process personal data on TPMG's behalf, TPMG expects them to provide sufficient guarantees and to be subject to appropriate contractual and security controls.

This approach matches the third-party and processor-control emphasis in your example materials. ICO guidance also requires controllers to use processors that provide sufficient guarantees and to have appropriate contractual terms in place. (ico.org.uk)

12. International Transfers

Where personal data is transferred outside the UK, TPMG aims to ensure that such transfers are made only where there is a lawful transfer mechanism and appropriate safeguards.

Your example materials explicitly require safeguards for non-UK transfers, including adequacy decisions, contractual safeguards and other lawful transfer routes. ICO guidance on international transfers follows the same approach. (ico.org.uk)

13. Retention and Deletion

TPMG does not keep personal data for longer than is necessary for the purpose for which it was collected, unless a longer retention period is required or justified by law, contract, dispute handling, safeguarding, audit or legitimate business need.

Personal data is reviewed periodically and deleted, anonymised or otherwise disposed of securely when no longer required.

This is strongly supported by your data retention examples and guidance notes, which emphasise storage limitation, periodic review, deletion and the risks of holding data for too long. ICO guidance likewise requires organisations not to keep personal data longer than necessary. (ico.org.uk)

14. Individual Rights

Subject to applicable law and exemptions, individuals may have rights including:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- rights in relation to certain automated decision-making.

These rights appear throughout your example policies and are also summarised by the ICO. (ico.org.uk) (ico.org.uk) (ico.org.uk)

Requests relating to personal data rights can be sent to dpo@tpmg-group.com.

15. Cookies, Website Use and Marketing

TPMG may use cookies and similar technologies on its website in accordance with its Cookie Policy and Privacy Notice.

Where TPMG sends marketing or updates, it aims to do so in line with applicable privacy and electronic marketing rules, including providing appropriate choice and unsubscribe options where required.

This is consistent with the fact that your template policies treat PECR and direct marketing as part of the broader data protection framework. ICO guidance also requires transparency and valid consent or other lawful routes for certain cookie and electronic marketing activity. (ico.org.uk)

16. Data Breaches and Incident Response

TPMG expects actual or suspected personal data breaches to be identified, escalated, assessed and handled promptly.

Where a personal data breach is likely to result in a risk to individuals' rights and freedoms, TPMG aims to comply with applicable notification obligations, including notification to the ICO where required and, where necessary, communication to affected individuals without undue delay.

This wording reflects your example breach sections, which specify escalation, notification content and the 72-hour ICO notification expectation where the risk threshold is met. ICO guidance states that certain personal data breaches must be reported to the ICO within 72 hours of awareness unless the breach is unlikely to result in a risk to individuals. (ico.org.uk)

17. Privacy by Design and Review

TPMG aims to consider privacy and data protection at the planning stage of new projects, systems, services and material changes to processing activities.

Where appropriate, TPMG may assess risks, define controls, review lawful bases, consider retention, and ensure that privacy information and safeguards are updated.

Your example materials repeatedly refer to privacy by design, DPIAs, regular review and documentation as core controls. ICO guidance similarly requires organisations to build privacy into processing and use DPIAs where high-risk processing is likely. (ico.org.uk)

18. Governance, Training and Accountability

TPMG recognises that data protection depends on clear responsibility, appropriate awareness and regular review.

Personal data is expected to be handled only by those who have a legitimate reason to do so, and individuals working with or on behalf of TPMG are expected to understand and follow relevant data protection and confidentiality obligations.

This mirrors the organisational-accountability language in your examples, including role responsibility, DPO oversight, contracts, awareness and review.

19. Contact Details

Questions about this Statement, TPMG's Privacy Notice, or the way TPMG handles personal data can be directed to:

TPMG

A trading style of TPMG Group Ltd
Cardinal Point, Park Road, Rickmansworth, WD3 1RE

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Tel: 020 7060 6228

General enquiries: admin@tpmg-group.com

Data Protection Officer: dpo@tpmg-group.com

Website: www.tpmg-group.com

Individuals also have the right to raise concerns with the Information Commissioner's Office if they believe their data protection rights have been infringed. (ico.org.uk)

20. Disclaimer

This Statement is intended to provide a high-level public summary of TPMG's data protection approach. It does not describe every internal control, technical safeguard, contractual term or operational procedure used by TPMG, and TPMG may amend or strengthen its arrangements from time to time in response to legal, contractual, operational or risk-based requirements.