



Twin Group
The Greenwich Centre,
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GDPR FAIR PROCESSING STATEMENT TO AGENTS

GDPR - General Data Protection Regulation – processing and protecting personal data

The new General Data Protection Regulation imposes additional requirements on Data Controllers (those who decide on behalf of an organisation how personal data is processed) and Data Processors. This section sets out our Fair Processing Policy with regard to the processing of personal data about employees or proprietors of your organisation

Twin Training International Limited is the Controller of personal data of individuals working for or within your agency. Its company registration number is **03118260** and its registered address is 1st Floor, 12 Lambarde Square, Greenwich, London SE10 9GB

PERSONAL DATA THAT WE NEED

We need minimal amounts of personal data from representatives of your agency which are entirely and wholly related to their dealings with Twin group. Unless otherwise agreed by you, we will only collect basic personal data about you, like your name, contact details (Phone, mobile, video addresses, email, Social if provided), relating to your role in your company, plus any background personal information e.g. your personal interests, which you choose to provide to us. We will not collect "sensitive personal data", e.g. dietary sensitivities, that you do not choose to provide to us.

WHY WE NEED IT

It is to our mutual benefit that we have effective means of contacting and interacting with members of your company to provide an excellent service at varying stages of your "customer journey" with Twin, from alerting you to a new Product, Promotion or Service opportunity, to quoting for an opportunity to confirming and then servicing that requirement, with the associated financial liaison, e.g. credit control. For that purpose, we need to have contact details for members of your company who purchase from Twin, or provide detailed requirements, or supply detailed information about students (names, ages, genders, special diets etc.), flights, Group Leaders and other information that is necessary to help us provide that service.

Twin Group consisting of: Twin Training International (Reg: 3118260), Twin Employment & Training (Reg: 07334749) and WAVA Ltd. (Reg: 5914029). 12 Lambarde Square, SE10 9GB





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WHAT WE DO WITH IT

The information is stored in secure Twin Systems. It is only referenced for the purposes of selling and delivering Twin Products and Services. In some cases these could be Twin Subscriptions to secure cloud-based systems provided by third parties. We will not disclose your personal data to third parties unless legally obliged to do so.

HOW LONG WE KEEP IT

We would generally keep this limited information for 10 years, subject to its remaining current, because we are aware of situations where an agent returns to us after a long hiatus in trading. When we become aware such personal data, specifically in relation to a business, is no longer current, e.g. where an employee moves to another employer or a proprietor chooses to retire, we would delete that personal data in relation to that business.

WHAT WE WOULD LIKE TO DO WITH IT.

In addition to fulfilling a product or service delivery to you in your capacity as Twin agent, we'd like to send you information about our products and services and if you are a current agent information about current or prospective bookings, by email, post, telephone or social media. As stated, we feel "legitimate interest" provides a helpful basis for our ongoing contact but would remind you that you can unsubscribe [here](#) at any time from proactive contact.

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