



## Data Protection Policy

Tyba is committed to protecting your personal data. This policy explains how and why we use your personal data to make sure you remain informed and in control of your information.

Tyba will ask its learners or potential learners to “opt-in” to receive information about our products and courses. This means you’ll have the choice as to whether you want to receive these messages.

You can choose not to receive information or change how we contact you at any time. If you would like to, please let us know by:

Emailing: [info@tyba.life](mailto:info@tyba.life)

Writing to us at our company address:

Tyba for training and HSE Consultancy  
1st floor Loaloat Elestad tower near Port Said Stadium, 23 July Street

Port Said,

Egypt

Telephone: [+20663259992](tel:+20663259992) (Mon to Sat: 9am-9.30pm Fri: Closed)

We will **never** sell your personal data. We may share personal data with other organisations who we work with to provide the service to you. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

### Questions

Any questions you have about this policy or how we use your personal data should be sent to: [info@tyba.life](mailto:info@tyba.life) or addressed to: The Data Protection Officer at the postal address given above.

### About Us

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you) will be collected and used by Tyba which is a private limited company with Company No: 40880

For the purposes of data protection law, Tyba will be the Data Controller.

### **What information do we collect?**

#### **Personal data you give to us**

We collect data you give to us. For example:

- Personal details (name, date of birth, email, address, telephone, education details etc.) when you sign up to an apprenticeship agreement
- Data known as sensitive personal data (ethnicity, additional learning needs)
- Financial information (payment information such as credit/debit card or direct debit details).

#### **Information created by your involvement with Tyba**

Your activities and involvement with Tyba create additional personal data, for example, information about your education progress and qualifications.

We may analyse your personal data to build a profile which helps us decide which of our communications you might be interested in.

#### **Information from other organisations**

We sometimes receive personal data from other organisations, for example, where they have passed us information about people who are interested in our apprenticeships and training courses.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

We may also use other organisations to help us conduct research and analysis on personal data (and this can result in new personal data being created).

#### **Sensitive personal data**

We may collect or store data known as sensitive personal data (such as information relating to additional learning needs or ethnicity). We will do this where we have been asked to do so by official Government agencies or where the information is needed for the assessment of additional educational support needs.

If we do this, we'll take extra care to ensure your personal data is protected.

#### **Accidents or incidents**

If an accident or incident occurs in one of our training centres or involving one of our employees then we'll keep a record of this (which may include personal data and sensitive personal data).

#### **How do we use personal information?**

We only ever use your personal data with your consent, or where it is necessary:

- To enter into, or perform, a contract with you

- To comply with a legal duty
- To protect your vital interests; this means, for example, keeping you safe from harm
- For our own (or a third party's) lawful interests, provided your rights are not affected

We will only use your information for the purpose or purposes it was collected for.

### **Administration**

We use personal data for administrative purposes. This includes:

- Receiving payment (e.g. direct debits or payment card details)
- Maintaining databases of our learners and their educational progress
- Performing our obligations under apprenticeship or training contracts
- Helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

### **Marketing**

We use personal data to communicate with people and to promote Tyba. This includes keeping you up to date with our news and offerings.

### **Research and Analysis**

We may carry out research and analysis on the data we hold to understand behaviour and responses and identify patterns and trends.

We evaluate, categorise and profile personal data to tailor services and communications we send out (including targeted advertising) and to prevent unwanted material from being sent to you.

### **Anonymised data**

We may combine sets of personal data and change the personal data so that it can no longer be linked to any particular person. This information may then be used to monitor Tyba's business performance or to identify trends or patterns within our existing learner database.

### **Disclosing and sharing data**

We will **never** sell your personal data. If you have opted-in to marketing, we may contact you with information about further opportunities in education.

We may share personal data with other organisations who provide us with services. For example, we may use an IT supplier to process personal data. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

### **Marketing**

Tyba will ask its learners and contacts to "opt-in" for marketing communications. This means you'll have the choice as to whether you want to receive these messages.

### **Young people**

As an education provider, we regularly process the personal data relating to young people who enquire about courses and training opportunities.

### **How do we protect personal data?**

We use a variety of physical and technical methods to keep your data safe and to prevent unauthorised access or sharing of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information using both physical and electronic means.

Our employees receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

### **Payment security**

All electronic forms that request financial data will use secure web technology to encrypt the data between your web browsers and our computers.

If you use a credit card, we will pass your credit card details securely to our payment provider.

### **CCTV**

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and Tyba. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

Tyba complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices, so you know when CCTV is in use.

### **Storage of personal data**

#### **Where Tyba information is stored**

We store our data within our internal servers

#### **How long does Tyba Keep information for?**

We will only use and store information for as long as it is needed for the purposes it was collected for. How long we keep information depends on the information and what it's used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

#### **How do we ensure that you remain in control of your data?**

We want to ensure you remain in control of your personal data and that you understand your legal rights which include:

- The right to ask and be told whether or not we have your personal data and, if we do to obtain a copy of the personal data we hold (this is known as a subject access request)

- The right to have your data deleted (though this will not apply where it is necessary for us to continue to use the data to administer your training course or apprenticeship.
- The right to have incorrect data amended
- The right to object to your data being used for marketing purposes or profiling

Please note that there are some exceptions to the rights above and, although we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

We can provide you with a subject access form template which includes guidance on how to make your request and will help us respond more quickly. Please contact us for a copy of this.

### **Complaints**

You can complain to Tyba directly by contacting our Data Protection Officer using the contact details set out above. If you would like to make a complaint which does not directly relate to your data protection and privacy rights please see Tyba's complaints policy which is available [here](#).

### **Cookies and links to other sites**

#### **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### **Links to other websites**

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the web page).

If an external website requests personal information from you, the information you provide will not be covered by the Tyba's privacy policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with Tyba.

**Changes to this privacy policy**

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

Wael Tyba

February 20, 2022