



# **EverSAFE Training Ltd**

## **Data Protection Addendum (DPA)**

### **Effective Date: January 2026**

#### **Introduction**

This Data Protection Addendum ("Addendum") forms part of any master agreement, contract for services, or data sharing agreement entered into between EverSAFE Training Ltd (the "Data Controller" or "Processor") and its clients, suppliers, or subcontractors. This Addendum ensures that all parties comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

#### **Scope and Applicability**

This Addendum applies to all personal data processed by EverSAFE Training Ltd in the delivery of its training services and consultancy work. It applies to:

- Employees and contractors of EverSAFE
- Clients and learners
- Suppliers and any sub-processors

Where we act as a Data Processor on behalf of a client (Data Controller), our obligations as set out in this document shall apply.

#### **Roles and Responsibilities**

Data Controller (EverSAFE or Client): Determines the purpose and means of processing personal data.

Data Processor (EverSAFE or Supplier): Processes data only on documented instructions from the Controller.

All parties must:

- Ensure data is processed lawfully, fairly, and transparently
- Protect personal data using appropriate security measures
- Maintain accurate and up-to-date records of processing activities



## Legal Basis for Processing

EverSAFE processes personal data under the following lawful bases:

- Performance of a contract (e.g. learner registration)
- Legal obligation (e.g. HSE or awarding body compliance)
- Legitimate interests (e.g. business operations and feedback)
- Consent (e.g. testimonials, marketing materials)

## Data Processing Details

Category	Description
Data Subjects	Learners, clients, employees, suppliers
Personal Data	Name, contact details, training records, ID verification, qualifications, emergency contacts
Special Category Data	Health information or access requirements (where applicable)
Processing Purposes	Course enrolment, certification, feedback collection, legal compliance
Retention Periods	Up to 7 years or in line with awarding body / legal requirements

## Sub-Processing and Third Parties

EverSAFE will not engage sub-processors without prior written authorisation from the Data Controller. Where sub-processors are used, they will:

- Enter into binding agreements with EverSAFE
- Be subject to equivalent data protection obligations
- Be monitored and audited regularly for compliance



## **International Data Transfers**

EverSAFE does not routinely transfer personal data outside of the UK. Where international transfers are necessary, they shall:

- Be subject to adequacy regulations or
- Use Standard Contractual Clauses (SCCs) approved by the UK ICO

## **Data Subject Rights**

All individuals whose data we hold have the right to:

- Access their data
- Rectify inaccuracies
- Erase their data (subject to legal exceptions)
- Restrict processing
- Data portability
- Object to processing
- Lodge complaints with the Information Commissioner's Office (ICO)

Requests must be addressed within one month. Contact:  
hello@eversafetraining.co.uk

## **Security Measures**

EverSAFE implements appropriate technical and organisational measures, including:

- Encrypted data storage and secure cloud environments
- Role-based access control
- Staff training on information security
- Secure disposal of data and devices
- Business continuity and disaster recovery planning

## **Data Breaches**

EverSAFE will:

- Notify the Data Controller of a personal data breach within 24 hours
- Cooperate with ICO investigations where applicable
- Document all incidents and corrective actions



## **Records and Accountability**

EverSAFE maintains a Data Processing Register and completes Data Protection Impact Assessments (DPIAs) for high-risk processing. Internal audits are conducted quarterly to ensure adherence to policies.

## **Review and Sign-Off**

This Addendum is reviewed annually or in line with legislative changes.

Approved by: Hayley Everingham

Version: 1.0

Approval Date: January 2026

Next Review Due: January 2027

Document Owner: Hayley Everingham