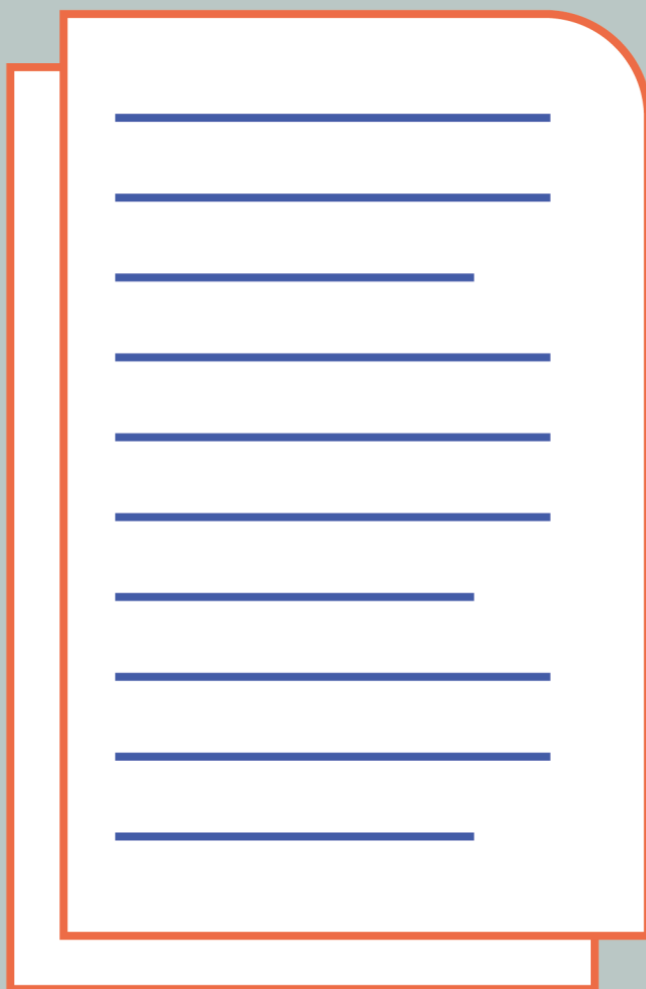


Data Protection Policy



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Certify Training Limited (CTQ) is committed to protecting personal data that is obtained during the course of its business, including when liaising with approved Centres, learners, Centre staff and any related third party.

This policy explains what personal data (information) we hold about you, how we collect it, and how we use and may share personal data.

We are required to notify you of this information under data protection legislation. Please ensure that you read this policy and any other similar notice we may provide to you from time to time when we collect, or process personal information about you.

All personal data must be handled and dealt with appropriately in whatever form it is collected, recorded and used, whether it is on paper, electronic records, or recorded in other formats held on computers (including email), photographs and audio recordings.

This policy applies to personal data as defined by the Data Protection Act 2018 and the General Data Protection Regulation (UK GDPR), that is, any information relating to an identified or identifiable living person.

It covers information which on its own does not identify someone, but which would identify them if put together with other information.

A defined role of Data Protection Officer (DPO) is required under Data Protection legislation if an organisation is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale.

The DPO is required to have an appropriate level of knowledge and can either be an in-house resource or outsourced to an appropriate service provider.

Based on these criteria, CTQ does not require a Data Protection Officer to be appointed.

Who collects the information

Certify Training Qualifications Ltd, Unit 2 Danworth Farm, Cuckford Road, Hurstpierpoint, Hassocks, United Kingdom, BN6 9GL is a 'data controller' and gathers and uses certain information about you. In this policy, references to 'we' or 'us' means Certify Training Qualifications Ltd, also referred to as CTQ.

Data protection principles

We will comply with the data protection principles when gathering and using personal information.

About the information we collect and hold

The table set out in Appendix 1 summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in Appendix 1 with other parties, such as external contractors, professional advisers, systems suppliers (hosting providers) and potential purchasers of some, or all of our business, or on a restructuring. The recipient of the information will be bound by confidentiality obligations.

We may also be required to share some personal information with our regulator and education bodies (including, but not limited to Department for Education (DfE), Education and Skills Funding Agency (ESFA), Learning Record Service (LRS), the Office of Qualifications and Examinations Regulation (Ofqual)), insurers, or as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate.

We will notify you of any changes to information we collect, or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices, and third-party agencies, service providers, representatives and agents as described above. This is integral to CTQ's business operations; CTQ cannot provide its services without this.

International transfers

Whilst this is not currently the case, in future some of our Approved Centres may be based outside the European Economic Area (EEA). Therefore the processing of their learners' personal data may involve a transfer of data outside the EEA.

Whenever we transfer personal data out of the EEA, we will ensure a similar degree of protection is afforded to it, by ensuring at least one of the following safeguards is implemented:

- We will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe
- Where we transfer data to learning centres based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US

How long we keep your information

We retain your information for no longer than is necessary, for the purposes for which the personal information is processed. CTQ will retain the personal data for all learners, irrespective of whether they have completed a CTQ qualification, or

withdrawn from the qualification for 50 years effective from the registration date, after which point it will normally be destroyed.

Your rights to correct and access your information and to ask for it to be erased

Please contact CTQ's Responsible Officer at the above address if (in accordance with applicable law), you would like to correct, or request access to information that we hold relating to you, or if you have any questions about this policy.

You also have the right, in certain circumstances, to ask us for some, but not all of the information we hold and process to be erased (the 'right to be forgotten'). We will provide you with further information about the right to be forgotten, upon request.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach, where we are legally required to do so.

If you identify a potential or actual data security breach relating to CTQ's systems, please contact CTQ's Responsible Officer by email at ro@ctq.org.uk immediately.

How to make a complaint

CTQ hopes that it can resolve any query or concern you raise about our use of your information. In the first instance please contact CTQ's Responsible Officer at the above address. Alternatively contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

POLICY REVIEW

This policy is reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements. It may be reviewed earlier should any feedback or concern be brought to the attention of CTQ to ensure it remains fit for purpose and the process and its outcomes are deliverable.

APPENDIX 1 - ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Learner name, date of birth, gender, ethnic origin, nationality, CTQ learner number, unique learner number if in receipt of public funding in England (ULN), contact details (i.e. address, home and mobile phone numbers, email address).</p> <p>Learner registration and completion dates; Details of assessments, qualifications, components and standards achieved.</p> <p>Copy of a learner’s photographic ID i.e. passport or driving licence</p>	<p>From CTQ approved Centres.</p> <p>In some circumstances learners may contact CTQ directly and provide this information</p> <p>From a learner during the video recording of remote proctoring sessions</p>	<p>For the purpose of performing our functions as an Awarding Organisation.</p> <p>The identification of a learner.</p> <p>There is a legitimate interest - to maintain learner and customer records and to comply with legal, regulatory and corporate governance obligations and good practice.</p> <p>The identification of a learner prior to sitting an exam</p>	<p>For the purpose of performing our functions.</p> <p>Data may be shared with our regulators, other educational bodies where appropriate and our external contractors / professional advisers/IT suppliers.</p>
<p>Details of approved Centre staff, to include name, contact details i.e. home and mobile phone numbers, email address.</p> <p>All supporting documentation required to confirm Centre staff competency to deliver CTQ qualifications (i.e. CV, copy of qualification certificates)</p>	<p>From CTQ approved Centres.</p> <p>In some circumstances Centre staff may contact CTQ directly and provide this information.</p>	<p>For the purpose of performing our function as an Awarding Organisation.</p> <p>There is a legitimate interest -to maintain customer records and to comply with legal, regulatory and corporate governance obligations.</p>	<p>For the purpose of performing our functions.</p> <p>Data may be shared with our regulators, other educational bodies where appropriate and our external contractors/professional advisers.</p>

You are required (by law, regulatory requirements or under the terms of your agreement with us, or in order to enter into an agreement with us) to provide the categories of information specified above to us where applicable, to enable us to provide you with the ability to deliver CTQ qualifications and to administer our learner and customer records. If you are unable to provide this information, we will not be able to:

- Approve you as an CTQ Centre to deliver our qualifications
- agree for you to deliver CTQ qualifications (this relates to the competency of Centre staff)
- register a learner for an CTQ qualification or component
- certificate a learner for an CTQ qualification or component

If you would like further details on how we handle sensitive personal information please contact the Responsible Officer by email at ro@ctq.org.uk.