

# QUALITY MANUAL

## MANAGEMENT

### DATA PROTECTION/PRIVACY POLICY

#### INTRODUCTION

CADUK is committed to data security and the fair and transparent processing of personal data. This privacy policy (Policy) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

#### WHO ARE WE?

Based at the E-Innovation Centre, Wolverhampton University, Telford Campus, Shropshire, TF2 9FT. CADUK are an Awarding Body Approved NVQ Centre that provides access to a variety of Regulated Qualification Framework (RQF) NVQs primarily in Construction and the Built Environment.

We work closely with a variety of Awarding Bodies Edexcel/Pearson/City & Guilds/SQA (Scottish Qualification Authority) to ensure that we provide an excellent range of qualifications that meet the needs of clients, employers and individual learners.

**For the purposes of the GDPR, CADUK is the ‘controller’ of the personal data you provide to us. If you have any queries about this Policy, the way in which CADUK processes personal data, or about exercising any of your rights, please send an email to [info@caduk.co.uk](mailto:info@caduk.co.uk) or write to Data Protection, E-Innovation Centre, Wolverhampton University, Telford Campus, Shropshire, TF2 9FT**

CADUK owns and operates [www.caduk.co.uk](http://www.caduk.co.uk) (Website). This Policy, together with our Website terms of use and any other documents referred to in them, sets out the basis on which CADUK processes personal data via our Website.

#### WHAT PERSONAL DATA DO WE COLLECT?

**We may collect and process the following personal data you provide to us If you:**

- complete a form on our Website
- correspond with us by phone, e-mail, or web based methods
- enter into a contract with us to receive our services

For example when completing one of our self assessment profile tools we may collect data including your name, e-mail address, postal address, telephone number, date of birth, job role and other information that we will need to ensure that Information we provide is accurate and appropriate.

## **If you visit our Website, we may automatically collect the following information**

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

## **Information we receive from other sources**

We may also receive information about you from a friend, family member, colleague, or employer if they are enquiring about a qualification on your behalf. If you are a learner we may also receive information about you from your assessor. This could include information relating to any particular assessment requirements.

## **Information about other people**

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us and our outsourced service providers, to use it.

## **Sensitive personal data**

In accordance with Awarding Requirements, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, physical or mental health or details of criminal offences) however, we will only do so on the basis of your explicit consent.

## **How do we use your personal data?**

When we ask you to supply us with personal data we will only use that data to ensure that the services that we provide are accessible, appropriate for your individual circumstances and add value.

This could include:

- registering a learner onto a qualification with the Awarding Body
- communicating with learners in relation to any issues, complaints, or disputes
- ensuring that all learners have fair and equal opportunities
- ensuring that learners have access to qualifications

**NOTE:** you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

**Where required by law:** we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

## **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

We may share your personal data with members of CADUK staff and/or external staff that are directly involved in your assessment process as well as the Awarding Body where required.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

We will share personal data with law enforcement or other authorities if required by applicable law.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of six years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

## **WHERE DO WE KEEP YOUR PERSONAL DATA AND HOW IS IT PROTECTED?**

We store your personal data in secure data centres in the UK or European Union. We take reasonable steps to protect your personal data from loss or destruction.

Where you have a username or password (or other identification information) which enables you to access our ePortfolio system, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our absolute best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## **YOUR RIGHTS**

Under the GDPR, you have various rights with respect to our use of your personal data:

### **Right to Access**

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond within 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

## **Right to rectification**

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

## **Right to erasure**

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

## **Right to object**

In certain circumstances, you have the right to object to the processing of your personal data where, for example, you feel that your personal data is being processed inappropriately or is being used for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

## **Right to restrict processing**

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

## **Right to data portability**

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

## **CONTACT**

If you have any queries about this Policy, the way in which CADUK processes personal data, or about exercising any of your rights, please send an email to [info@caduk.co.uk](mailto:info@caduk.co.uk) or write to CADUK, E-Innovation Centre, Priorslee, Telford, TF2 9FT.

## **COMPLAINTS**

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

## **CHANGES TO OUR POLICY**

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.