1. Introduction

Accelerate People Ltd is committed to ensuring data security and the fair and transparent processing of your data. This privacy policy sets out how we will treat the personal data which you provide to us for End-point Assessment (EPA) in compliance with the General Data Protection Regulations (EU) 2016/679 (GDPR).

This policy contains important information on how and why we collect, store, use and share personal data and your rights in relation to your personal data.

1. What personal data do we collect?

We may collect your name, email address, postal address, telephone numbers and date of birth.

We may collect this from several different sources such as:

* Data from registration documentation
* Data from your EPA forms
* Data from completed surveys
* Correspondence with Accelerate People Ltd
* Contractual / Service Level Agreement data

In addition, if you visit our website we may automatically collect:

* Technical information including the IP address used; login information; browser type and version, operating systems and platforms
* Information about your visit including the pages you visited; what you searched for; length of visits and methods used to browse away from the page

Accelerate People Ltd where necessary, may collect certain sensitive personal data from you. Sensitive data is classified as information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life or details or criminal offences, or genetic or biometric data). This will only be done with your explicit consent.

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

1.
2. How do we use your personal data?

**As a Learner**

In all circumstances we will be considered as the Data Processor when processing your Personal Data in relation to the services we deliver, and your Training Provider will be the Data Controller.

We may use your personal data to fulfil a contract with a Training Provider or take steps linked to a contract:

* To provide the EPA to you;
* To communicate with you in relation to the provision of the contracted products and services;
* To provide you with administrative support such as account creation, security and responding to issues;
* Provide you with surveys or information about our products and/or services.

Legal Basis for processing your data

We will use the legal basis of Legitimate Interest to process your data, this due to the contractual connections you have with your Training Provider and they have a contractual relationship with us to provide our services. These interests are:

* Providing you with information about our products and services which all us to deliver our contracted services.
* Communicating with you in relations to any queries, issues or complaints.
* Taking part in internal and external audits.

What information do we need?

When you speak to our assessors and advisors, we may ask for the following information:

Your full name, email address, telephone number, postal address and date of birth

Your education and work experience, where relevant to the course

Your job title, job level, team size

How long will your personal data be kept?

Your data will be held for a period of 7 years in line with our regulatory and governing body requirements, where there may be a requirement to hold your data to evidence the completion of studies or for audit purposes.

**As a business-to-business contact**

In all circumstances we will be considered as the Data Controller when processing your Personal Data in relation to the services we deliver.

We may use your personal data to either inform you about the services we delivery or to fulfil a contract.

Legal Basis for processing your data

We will use the legal basis of Legitimate Interest to process your data, this either due to the contractual connections we have with your company or the potential business we may provide to your company in the future. These interests are:

* Providing you with information about our products and services
* Communicating with you in relations to any queries, issues or complaints
* Taking part in internal and external audits

What information do we need?

When you speak to our course advisors or enrol on a course, we may ask for the following information:

* Your full name, email address, telephone number, postal address and date of birth
* Your company name, company size and industry type
* Your job title, job level, team size

How long will your personal data be kept?

Your data will be held for a period of 7 years

Where you have supplied your consent to receive future communications about our products that maybe relevant to your enquiry or the sector of training being undertaken, we will hold your information for an indefinite period of time. Your information will be kept with us until you notify us that you no longer wish to receive this information. You have the right to withdraw consent at any time.

**As a Prospective, Current and Former Members of Staff**

In all circumstances we will be considered as the Data Controller when processing your Personal Data in relation to all employment

How do we collect information about you?

Information is provided to Accelerate People by:

* Job application forms
* Third party agency which you are using for recruitment purposes or have your CV’s with

What information do we need?

We may ask for the following information:

* Your full name, email address, telephone number, postal address and date of birth
* Your education and work experience
* Your next of kin’s full name, telephone number and postal address
* Your bank account details
* Copy of your identification, either passport of driving license
* Why do we need your data and the legal basis we use to process it?
* Job Applications: We collect personal information in the context of processing job applications as necessary to comply with our legal and regulatory obligations to ensure that our application processes comply with applicable laws and also for our legitimate interests to ensure that candidates are appropriately qualified and suitable for working with us. Such processing may also be necessary for us to take steps before entering into an employment contract with a candidate.

Employment: We collect personal information in the context of processing job applications as necessary to comply with our legal and regulatory obligations. We will rely upon contractual obligation as the lawful basis for the processing your personal information.

How long your personal data will be kept?

If you are an unsuccessful applicant, we will keep your details for up to 2 years, if we feel you would be suitable for a position in our organisation we will contact you.

We only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, for employment details this is usually 7 years. Details of retention periods for different aspects of your personal information are available in our retention policy.

1. Who do we share your personal data with?

We may be required to share your personal data with trusted third parties, such as Regulatory Bodies, EFSA, IfATE, EQA. 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 business need to know it.

We have no requirement to share your data with a third-party recipient that is located outside of the European Economic Area.

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

1. Where do we store and protect your personal data?

We take reasonable steps to protect your personal data from loss or destruction. We will notify you and the Regulators of a suspected data security breach where we are legally required to do so and will comply with our internal procedures to deal with any suspected data security breach.

Where you have been issued a username and password (or other identification information) to access any Accelerate People Ltd portals, it is your responsibility to keep this information secure. Please do not share your password with anyone.

Although we use strict protocols and security features to try to prevent unauthorised access.

Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to the Accelerate People Ltd website; any transmission is at your own risk.

1. Your Rights

Under GDPR you have various rights with respect to our use of your personal data, as a Learner we will be defined as a Data Processor and your Training Provider will be the Data Controller, in almost all circumstances they would be your first contact point to invoke your rights.

**Right of Access**

You have the right to request a copy of the personal data we hold about you by contacting us Directly.

**Right to Rectification**

We aim to keep your personal data up to date, accurate and complete and we encourage you to contact us if your personal data changes or you are aware that it is not accurate.

**Right to Erasure / Right to be Forgotten**

You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purpose for which they were collected, where you withdrew your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data or your data has been unlawfully processed.

Please note that candidates’ EPA results must be kept as we report on this to various Regulators and auditors, and in these circumstances your request will be refused.

If you would like to request that your personal data is erased, please complete the Right to Be Forgotten Form that can be found at the end of this policy.

**Right to Object**

You have the right to object to the processing of your personal data in certain circumstances, for example, where your data has been processed based on legitimate interests but there is not overriding legitimate interest for us to continue to process your data, or if your data is being processed for direct marketing purposes. If you would like to submit an objection to the processing of your data, please contact us directly.

**Right to Restrict Processing**

You have the right to request that we restrict the further processing of your personal data in certain circumstances. 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. If you would like to submit an request to restrict the processing of your data, please contact us directly.

**Right to Data Portability**

You have the right to request that some of your personal data is provided to us, or to another data controller in commonly used machine-readable format in certain circumstances. This right arises where you have provided your personal data to us, the processing is based on consent of 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 directly

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.

1. Contact Details and Complaints

Full name of legal entity:

Accelerate People Limited

Email address:

dp@accelerate-people.co.uk

Postal address:

Accelerate People, Scale Space, 58 Wood Lane, London, W12 7RZ

If you believe that your data protection rights have been breached and we have been unable to resolve your concern, you have the right to report your concern to the Information Commissioner’s Office at <https://ico.org.uk/concerns> .

1. Service Providers

We work with third party service providers who provide email hosting, core corporate applications, web hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information. An up to date list of our service providers can be found below.

1. To Whom We Disclose Information

Except as described in this Privacy Policy, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without the consent of the data subject. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

Unrestricted Information

Any information that you voluntarily choose to include in a public area of the Service, such as a public profile page, will be available to any visitor or User who has access to that content.

1. Overseas transfers

If you are a User based in the UK or the European Economic Area (EEA), the information you provide may be transferred to countries outside the UK or EEA that do not have similar protections in place regarding your data and restrictions on its use as set out in this policy. However, we will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your information, you consent to these transfers for the purposes specified above.If you are a User based in the UK or the European Economic Area (EEA), the information you provide may be transferred to countries outside the UK or EEA that do not have similar protections in place regarding your data and restrictions on its use as set out in this policy. However, we will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your information, you consent to these transfers for the purposes specified above.

We may transfer your personal information to our service providers located outside of the UK or EEA as specified in the list of service providers which can be found at the end of this Privacy Policy.

All of our International service providers have each provided the information to demonstrate they have appropriate technical and organisational measures in place to safeguard Personal Data, and it shall be processed to at least the same standards as set out by the General Data Protection Regulations (GDPR). Each organisation has entered into Standard Contractual Clauses with Hive Learning, which is accepted by the European Commission as evidence that an adequate level of protection exists for the Personal Data in the country, territory, or organisation where it is being transferred.

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| Subcontractor Legal Name | Jurisdiction of where the services are provided | Description of services provided | Transfer mechanism in place to ensure adequate level of protection for personal data where the transfer is to an entity outside the EU |
| Microsoft | UK and US | For the purpose of corporate applications | Standard Contractual Clauses/International Data Transfer Agreement  |
| Freshworks  | UK and US | For the purpose Customer Relationship Management services and End Point Assessment Task Management | Standard Contractual Clauses/International Data Transfer Agreement |
| Zoho | US | For the purpose Customer Relationship Management services | Standard Contractual Clauses/International Data Transfer Agreement |
| Blenheim Chalcot IT Services India PVT.LTD | India | For the purpose of back-office finance and invoicing services and helpdesk queries | Standard Contractual Clauses/ International Data Transfer Agreement |
| Blenheim Chalcot LTF Limited | UK | For the purposes of internal operations | Not Applicable |