

## GDPR Statement

### Introduction

The EU General Data Protection Regulation (“GDPR”) came in to force on 25<sup>th</sup> May 2018.

The new Regulation aims to standardize data protection laws and processing across the EU, giving people greater rights to access and control their personal information.

### Our Commitment

Up-Skilled Limited (Hereafter Up-Skilled(hereafter Up-Skilled, referred to as “we” or “us”) are committed to ensuring protection of all personal information that we hold, and to provide and protect all such data. We recognize our obligations in updating and expanding this programme to meet to ongoing requirements of GDPR.

Up-Skilled are dedicating to safeguarding the personal information under our control and in maintaining a system that meets our obligations under the new regulations and our practice is summarised below:

### How we prepared for GDPR

Up-Skilled already have a consistent level of data protection and security across our business which is required to meet our accreditors high standards of data protection and security. In order to ensure compliancy throughout our business, we conducted a review of our practices and introduced the following measures:

- Information Audit – We carried out an audit of information previously held and ensured it was compliant with the new regulations.
- Policies and Procedures – We have revised our data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

Data Protection – our main policy and procedure document has been revised to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities with a dedicated focus on privacy and the rights of individuals.

Data Retention and Erasure – we have updated our retention policy and schedule to ensure that we meet the ‘data minimisation’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed in accordance with our obligations. We have procedures in place to meet the new ‘Right to Erasure’ obligation.

Data Breaches – Our procedures ensure that we have safeguards in place to identify, assess, investigate, and report any personal data breach as early as possible. Our procedures have been disseminated to all of our employees.

International Data Transfers and Third-Party Disclosures – Where Up-Skilled stores and transfers personal information outside the EU, we have procedures in place to secure the integrity of the data.

Subject Access Request (SAR) – We have revised our SAR procedures to accommodate

the revised 30 day timeframe for providing the requested information and for making this provision free of charge.

- Privacy Policy - We have revised our Privacy Policy to comply with the GDPR ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- Obtaining Consent - we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information.
- Direct Marketing: We have provided clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all electronic marketing materials.
- Data Protection Impact Assessments (DPIA) - Where we process personal information that is considered high risk, we have developed stringent procedures for carrying out impact assessments that comply fully with GDPRs Article 35 requirements and these assessments are documented and include our assessment of the risk and implementing mitigating measures to reduce the risk posed to the data subject.
- Processor Agreements - where we use any third party to process personal information on our behalf (Accreditors, systems, hosting, administration) we have completed due diligence procedures and ensured the GDPR policies are understood and compliance is maintained.

## Data Subject Rights

We provide easy-to-access information via our learner platform of an individuals right to access any personal information that Up-Skilled processes about them and to request details of:

What data we hold about them

The purposes of processing

The categories of personal data concerned

The recipient to whom the personal data has been/will be disclosed

How long we intend to store your personal data for

If we did not collect data directly from them, information about the source

The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this

The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use

The right to lodge a complaint or seek judicial remedy and who to contact in such instances

## Information Security and Technical and Organisational Measures

Up-Skilled takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect information from unauthorized access, alteration, disclosure or destruction.

## GDPR Roles and Employees

Up-Skilled has designated Scott Hamer as our principal Data Protection/GDRP officer. The responsibilities of this appointment are to ensure ongoing compliance with Data Protection Regulation including promoting awareness of the GDPR across the business, assessing our GDPR compliance, identifying any gap areas and implementing new policies, procedures and measures.

Up-Skilled understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our policies.

If you have any questions about our GDPR compliance policies, please contact Scott Hamer at [scott@up-skilled.co.uk](mailto:scott@up-skilled.co.uk)