

# **CompEx Certification Limited Privacy Statement**

#### **Data Protection Regulations**

This privacy policy sets out the ways in which CompEx Certification Limited ("CompEx") collects, processes and stores personal information.

CompEx is committed to protecting and maintaining the security of personal information. CompEx follows strict security procedures in the collection, processing, storage and disclosure of information to prevent unauthorised access to information. However, CompEx shall not be responsible for any unauthorised use, distribution, damage, or destruction of personal data, except to the extent we are required to accept such responsibility by the Data Protection Regulations.

CompEx does not sell, rent, or exchange your personal information with any third party for commercial reasons. All personal information collected, processed and/or stored by CompEx will only be used in accordance with this privacy statement.

#### **CompEx Schemes, Products and Services**

CompEx collects, processes and stores user information provided by prospect learners, candidates, alumni, instructors, assessors, training provider staff and stakeholders when accessing the CompEx:

- Qualifications scheme, including application, pre-requisites review (qualifications, knowledge, skills and experience), training, instruction, assessment, certification of competency, and registration
- Registered instructor / assessor scheme, including application, pre-requisites review (qualifications, knowledge, skills and experience), training, instruction, demonstration through quality assurance assessment, and registration
- Digital learning content and learning resources hosted on a CompEx digital platform (LMS and mobile apps) including both CompEx-owned resources and curated content from 3<sup>rd</sup> party providers

CompEx collects, processes and stores information provided by prospect training providers when accessing the CompEx:

 Approved training provider scheme enabling training providers to apply CompEx approval and CompEx licences for their managed training centres, including application, demonstration of due diligence and quality assurance, registration, and centre licence registration.

# **Data Sharing Agreements**

- Where information is shared with CompEx-approved training providers, to enable users to access the CompEx qualifications scheme and/or the CompEx instructor / assessor scheme, CompEx uses a Data Sharing Agreement for the security and protection of information.
- Where information is shared with 3<sup>rd</sup> party content providers, to enable users to access digital learning content and resources, CompEx uses a Data Sharing Agreement for the security and protection of information.
- Where information is shared with an employer company, association of employers or membership
  organisation, to enable users to access digital content and resources, CompEx uses a Data Sharing
  Agreement for the security and protection of information.

### **Personal Information Required**

In all cases, CompEx requires complete information sets to enable users to access CompEx schemes, products and services. Furthermore, CompEx may require users to regularly update personal information, to ensure continued access to CompEx schemes, products and services.

## **CompEx Candidates**

To apply for the Compex qualification scheme including any relevant assessment, training and instruction, and access to digital learning content and resources, candidates must provide the following information:

- Full Name
- Date of Birth
- Nationality
- Current address
- Telephone number
- E-mail address
- Photo Identification (passport / driving licence) for identification verification purposes
- Qualifications and evidence of relevant knowledge, skills and experience as detailed in the Competency Pathway document <a href="https://compexcertification.com/centres/resource-centre/">https://compexcertification.com/centres/resource-centre/</a>
- Employment details & job role
- Photograph (for display on CompEx Certification)
- Any other information deemed necessary for the purposes of identity verification

### **CompEx Registered Instructors / Assessors**

To apply to become registered as a CompEx instructor and/or assessor, and including any relevant training, instruction and access to digital learning content and resources, applicants must provide the following information:

- Full name
- Date of birth

- Nationality
- Current address
- Telephone number
- E-mail address
- Qualifications
- Curriculum Vitae (with evidence of knowledge, skills and experience)
- Reference letters (previous & current employer).
- Photo Identification (passport / driving licence) for identification verification purposes
- Any other information deemed necessary for the purposes of identity verification and/or quality assurance

## **CompEx User of Digital Content and/or Digital Resources**

CompEx User is a generic term referring to prospect learners, candidates, alumni, instructors, assessors, approved training provider staff and stakeholders.

To apply to access any digital learning content and/or learning resources hosted on a CompEx digital platforms (LMS and mobile apps) including both CompEx-owned resources and curated content from 3<sup>rd</sup> party providers, applicants must provide the following information:

- Full name
- Country of residence
- Mobile number (2fa)
- E-mail address (2fa)
- Any other information deemed necessary for the purposes of enabling access to CompEx-owned and/or 3<sup>rd</sup> party learning content and resources

#### **CompEx Approved Training Providers**

To apply to become an approved training provider, applicants must provide the following information:

- Registered company name / legal entity
- Registered Company number
- Company address
- Full names / dates of birth / nationality of all staff directly connected to the delivery of CompEx.
- Telephone number
- E-mail address
- Any other information deemed necessary for the purposes of due diligence and quality assurance

This information supports the full list of documentation required for due diligence, as specified in the CompEx Centre Application Manual (CCL4003).

#### **CompEx Service Users**

To register for, or submit enquiries to, any of the CompEx services listed below, users must provide the following information:

- Full name
- Date of birth
- Address
- Company name
- Telephone number
- E-mail address
- Any other information deemed necessary for the purposes of processing the registration or enquiry

#### **CompEx Services:**

- CompEx website enquiry form
- CompEx certification verification portal
- Submission of enquiry to CompEx via email, telephone or in writing
- CompEx store

### **Storing and Processing Information**

### • Candidates Applying for a CompEx Qualification Assessment:

Candidates are required to complete, sign and submit a CompEx application form (either paper-based or online), together with evidence of their suitability for the required qualification assessment. This application form and any relevant documentation may be submitted directly to CompEx, or to a CompEx licenced training centre which is managed by a CompEx approved training provider.

Both CompEx and each CompEx approved training provider are bound by the terms of a Data Sharing Agreement, which is compliant with current data protect legislation. The Data Sharing Agreement enables the sharing and transfer of candidate information, for the purpose of delivering the CompEx qualifications scheme.

CompEx will store candidate information indefinitely to enable online verification of a candidate's certification status. There is no requirement for a training provider to store candidate information, once they have processed it. As such, a training provider would need to agree storage of candidate information, independently with candidates.

All candidates who apply for a CompEx qualification assessment will be required to have their identify verified by Creditsafe and their delivery partner Credas. All data is stored in compliance with Data Protection Regulations and is detailed on the Creditsafe and Credas websites:

www.creditsafe.com/gb/en/legal/privacy-policy.html and https://credas.com/gdpr-compliance-statement/

### • Instructor / Assessors Applying for CompEx Registration:

Instructors / Assessors are required to complete, sign and submit a CompEx application form (either paper-based or online), together with evidence of their qualifications, knowledge, skills and

experience. This application form and any relevant documentation may be submitted directly to CompEx, or to a CompEx licenced training centre which is managed by a CompEx approved training provider.

Both CompEx and each CompEx approved training provider are bound by the terms of a Data Sharing Agreement, which is compliant with current data protect legislation. The Data Sharing Agreement enables the sharing and transfer of assessor / instructor information, for the purpose of delivering the CompEx instructor / assessor registration scheme.

CompEx will store registered instructor / assessor information for the duration of the registration period, which may be terminated by the instructor / assessor withdrawing from the scheme, or by CompEx withdrawing the registered instructor / assessor from the scheme. There is no requirement for CompEx approved training providers to store instructor / assessor information, unless the instructor / assessor is an employee of the CompEx approved training provider, and with the correct employer-employee data sharing policies in place.

All instructors / assessors who apply to become a CompEx registered instructor / assessor will be required to have their identity verified by Creditsafe and their delivery partner Credas. All data is stored in compliance with Data Protection Regulations and is detailed on the Creditsafe and Credas websites: <a href="www.creditsafe.com/gb/en/legal/privacy-policy.html">www.creditsafe.com/gb/en/legal/privacy-policy.html</a> and <a href="https://credas.com/gdpr-compliance-statement/">https://credas.com/gdpr-compliance-statement/</a>

## Users Requesting Access to Digital Content and/or Digital Resources

A CompEx User is a generic term referring to prospect learners, candidates, alumni, instructors, assessors, approved training provider staff and stakeholders.

All CompEx users are required to digitally sign and submit registration information, when accessing digital learning content and resources for the first time. The registration format and information required is variable across CompEx digital platforms (LMS and mobile apps) and across digital content and resources, depending on the provider (CompEx owned or curated from 3<sup>rd</sup> party providers).

A request for user access to digital content and resources on the CompEx LMS platform, is submitted directly to CompEx, and CompEx then provides a user access link. Further user information may also be requested when a user accesses a digital platform, or specific pieces of learning content, for the first time.

A request for user access to a CompEx mobile app, is made directly by accessing the Apple Store or Google Play Store, and following the instructions to download and access the mobile.

Requests for access to digital learning content and resources may be made by:

- A candidate completing, signing and submitting the qualification assessment application form
- An individual user emailing a direct request to CompEx

- A CompEx approved training provider emailing a list of prospect users to CompEx, subject to the training provider having first obtained the permission of the users, and subject to a data-sharing agreement in place between the training provider and Compex
- An employer company, association of employers or membership organisation emailing a list
  of prospect users to CompEx, subject to the employer company, association of employers or
  membership organisation having first obtained the permission of the users, and subject to a
  data-sharing agreement in place between the employer company, association of employers
  or membership organisation and Compex

Access to digital learning content and resources is available to all users on an opt-in basis. A request for access, and the provision of data sharing agreements wherever relevant, ensure that user permissions are secured before access to digital content and resources is given, and that user personal information is protected.

CompEx will store registered user information for the duration of the registration period, which may be terminated by the user by de-registering for access, or by CompEx withdrawing user access, withdrawing the digital platform or withdrawing specify items of digital content.

There is no requirement for training providers, employer companies, associations of employers, membership organisations or any 3<sup>rd</sup> party organisations to store user information once they have processed it, unless such information is subject to internal organisational privacy policies and notices.

### • Training Providers Applying to become CompEx Approved:

Training providers are required to complete, sign and submit (either paper-based or online) a preapplication questionnaire, followed by a full application together with the full list of documentation required for due diligence, as detailed in the CompEx Centre Application Manual (CCL4003). These application documents must be submitted directly to Compex.

Subject to a successful pre-application decision to progress, both CompEx and the prospect training provider are bound by the terms of a mutual Non-Disclosure Agreement (NDA).

CompEx will store the training provider application information and documentation for the duration of the application period, and if the full application for CompEx approval is successful, for the duration of the contractual period thereafter.

All training providers that submit a full application to become a CompEx approved training provider, will be subject to checks relating to international trade and financial sanctions. Members of staff employed by the training provider and directly involved in the delivery of CompEx schemes products and services will be required to have their identity verified by Creditsafe and their delivery partner Credas. All data is stored in compliance with Data Protection Regulations and is detailed on the Creditsafe and Credas websites: <a href="www.creditsafe.com/gb/en/legal/privacy-policy.html">www.creditsafe.com/gb/en/legal/privacy-policy.html</a> and <a href="https://credas.com/gdpr-compliance-statement/">https://credas.com/gdpr-compliance-statement/</a>

#### Service Users:

CompEx will store service user information indefinitely, for the purposes of reviewing and improving customer services.

However, service users purchasing goods from the CompEx online shop, may be subject to checks relating to international trade and financial sanctions. Service users may also will be required to have their identity verified by Creditsafe and their delivery partner Credas. All data is stored in compliance with Data Protection Regulations and is detailed on the Creditsafe and Credas websites: <a href="https://credas.com/gb/en/legal/privacy-policy.html">www.creditsafe.com/gb/en/legal/privacy-policy.html</a> and <a href="https://credas.com/gdpr-compliance-statement/">https://credas.com/gdpr-compliance-statement/</a>

## **Using Personal Information**

CompEx may use stored personal information of users (prospect learners, candidates, alumni, instructors, assessors, approved training provider staff, and stakeholders) in the following ways:

- Internal record keeping
- Registering users for CompEx schemes, products and services
- Verification of users
- Validation of Certification
- Providing industry information
- Conducting customer surveys
- Using aggregate information and statistics to develop our CompEx schemes, products and services
- Contacting users in relation to:
  - Further information about CompEx schemes, products and services
  - Delivery of CompEx schemes, products and services
  - Quality assurance processes, investigations, complaints, and appeals.

#### **Disclosure of Personal Information**

CompEx will not sell or license your personal information to any third party. However, we may disclose user personal information:

- Where there is a duty to disclose or share personal information, in order to comply with any legal obligations
- If CompEx is sold or integrated with another business user details may be disclosed to CompEx advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business
- In line with the Certification Body Regulations
- To support any compliance investigation. As such, an employer may be approached for further
  information, where it is suspected that an employee has made a false or misleading claim to
  CompEx Certification status. Where the compliance investigation proves beyond doubt that the
  employee has made a false or misleading claim to CompEx certification, then the employer will be
  informed.
- Where a user has given their permission for disclosure of their personal information, learning progress, assessment results and certification status, to their employer, where their CompEx qualification is being been funded by their employer.

## **User Rights**

Under the GDPR, users have rights with respect to the use of their personal information.

CompEx has appointed IT Governance Europe Limited to act as the CompEx EU representative. For exercising rights under the EU General Data Protection Regulation (EU GDPR) and for any queries in relation to rights and privacy matters, users are advised to email the CompEx EU representative at <a href="mailto:europe:eu

#### **Removal of Personal Information**

Users have a right to have their personal information erased and to prevent processing in specific circumstances:

- Where the personal information is no longer necessary in relation to the purpose for which it was originally collected / processed.
- When the user withdraws their permission
- The personal information must be erased to comply with a legal obligation.

Where a user withdraws their permission, this will result in any current certification and/or any current access to CompEx schemes, products and services, being withdrawn.

Furthermore, the right to remove personal information does not provide an absolute 'right to be forgotten'.

There are some specific circumstances where the user's right to the removal of information does not apply, and CompEx will provide further details on this, upon request.

#### **Access to Information**

Users have the right to request a copy of the personal information held by CompEx, by contacting:

Non-EU Citizens - <u>privacy@compex-cert.com</u>
EU Citizens - <u>eurep@itgovernance.eu</u>

Upon request, CompEx will send the user a subject access request form to complete and return to CompEx. There is no fee applicable to this request, however, a 'reasonable fee' will be applied where a request is manifestly unfounded or excessive, particularly if it is repetitive.

#### **Amendments, Corrections and Withdrawal of Permissions**

CompEx will correct any inaccuracies in the personal information held for a user, upon request. CompEx will also recognise withdrawal of user permissions, by removing access to CompEx schemes, products and services. Users should make requests by contacting:

Non-EU Citizens - <u>privacy@compex-cert.com</u>
EU Citizens - <u>eurep@itgovernance.eu</u>

## Unsubscribing

Users may unsubscribe from marketing communications at any time by contacting CompEx at:

Non-EU Citizens - <u>privacy@compex-cert.com</u>
EU Citizens - <u>eurep@itgovernance.eu</u>

Users should state clearly in the correspondence if they wish to opt out of marketing communications.

# **Changes to the CompEx Privacy Statement**

Any changes made to the CompEx privacy policy will be posted on this page.