



CVQO Privacy Policy Website

Who and what is this policy for:

The Privacy Policy for the CVQO website outlines how CVQO collect and use your personal data, how and who will be required to handle it and how and where CVQO will share it. It also advises you of your rights under GDPR and who to contact if you have issues or questions relating to the handling of your personal data.

If you have any queries on this policy, please contact dpo@cvqo.org.

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Introduction

CVQO Ltd (CVQO) is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how CVQO treats learner personal data.

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

Who are we?

CVQO is an educational charity whose purpose is to advance the education and training of members of youth movements and young people in schools by enabling them to obtain vocational qualifications. For the purposes of the General Data Protection Regulation (GDPR) CVQO is a 'controller' of learner personal data. CVQO is a private company limited by guarantee incorporated in England and Wales (registration number 05736932). CVQO's registered address is 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER. CVQO is a charity registered in England and Wales (registration number 1115234) and Scotland (registration number SCO 39261).

What personal data do we collect?

We may collect and process the following personal data:

Information you provide to us if you:

- complete a form on our Website;
- complete a survey;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- create an account with us;
- enter into a contract with us to receive products and/or services,

We may collect your name, e-mail address, postal address, telephone number and job role

Information we collect about you 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; and,
- 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.

Click [here](#) to see our Cookie Policy.

Information that we receive from other sources:

We may also receive information about you if you use any of the other websites we operate or the other services we provide.

If you are a Vocational Qualification Officer (VQO) or learner in the Cadets, we may also receive information about you from your Cadet Force. This also applies to other adults working within the supervisory structure – Commandants, Area Officers, Area Training Officers, etc

Sensitive personal information

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data).

Who do we use your personal data with?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you or whether the supply of any personal data we ask for is optional.

Contract performance: we may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide the products and/or services 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; and,
- provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

Legitimate interests: where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our qualifications and events, offers and promotions, which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website and/or our Moodle VLE;
- performing analytics on take up information to determine the effectiveness of promotional campaigns.

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 set out below.

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.

We may use your personal data, including images and video of you, in our promotional activities where you have given your consent for us to do so.

Who do we share your personal data with?

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 may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

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.

Where a third-party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

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

How long will we keep your personal data?

If you are or become a learner with CVQO, we will retain personal data relating to your learning, assessment and certification, our quality assurance processes, appeals, or investigations for a period of 6 years 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 there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of 6 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 store your personal data and how is it protected?

CVQO stores data held in hard copy at its head office and that held digitally in a UK data centre within a secure and continually monitored facility. Some personal data is also held by CVQO field staff, where this is necessary for them to perform their duties in respect of current and potential learners. We take reasonable steps to protect your personal data from loss or destruction, including training all of our staff on CVQO data protection policies and practices. We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioners Office (ICO) of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our Website or other on-line services, 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 best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website or other on-line services; 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, as follows.

Right to be informed

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR. CVQO will provide you with information including: our purposes for processing your personal data, our retention periods for that personal data and who it will be shared with. We will do this through our Privacy Policies and Notices.

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us using the contact details provided below. Please include with your request information that will enable us to verify your identity. We will respond within 1 month 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 there is no basis for your request, or if it is 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, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data or if your data is being processed 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 queried 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 wish to exercise this right 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 make such request, please contact us using the contact details provided below.

Rights in Relation to Automated Decision Making and Profiling

CVQO does not engage in automated individual decision-making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain things about an individual). If we did undertake such processing, individuals would have the rights to have information about the processing and to request human intervention or challenge decisions and we would have to carry out regular checks to make sure that our systems were working as intended.

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 CVQO processes personal data or would like to exercise any of your rights, set out above, please contact our Data Protection Officer:

- by clicking [here](#) and completing a request;
- by sending an email to dpo@cvqo.org; or,
- by writing to the Data Protection Officer, CVQO Ltd, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

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 with the applicable supervisory authority or 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 Policies

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.