



GDPR Compliance Statement

Introduction

The **EU General Data Protection Regulation ("GDPR")** comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

Cleverdotsolutions Limited ('we' or 'us' or 'our') is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place, that complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR and the UK's Data Protection Bill.

Cleverdotsolutions Limited is dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in our Personal Data Privacy and Cookie Policy to ensure maximum and on-going compliance.

In summary, Cleverdotsolutions Limited complies with its obligations under the General Data Protection Regulation (GDPR) by keeping personal data up-to-date; by storing and destroying it securely; by not

collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure; by ensuring that appropriate technical measures are in place to protect personal data and by guaranteeing total transparency on how we manage your data.

Below is our Personal Data Privacy Policy, however, if you have any concerns, please contact us by emailing hello@cleverdotsolutions.co.uk.



Gillian Tinney
Managing Director

Cleverdotsolutions Limited

a: 85 Middlethorpe Grove | YORK | North Yorkshire | YO24 1JX

t: +44 (0)1904 778830

w: cleverdotsolutions.co.uk

Personal Data Privacy Policy

Why we collect your personal data

1. **Cleverdotsolutions Limited** ('we' or 'us' or 'our') collect your personal data to process registrations for any courses, assessments or events and to delivery those services to you.
2. To process the sales of products you have purchased from us.
3. To send you information regarding the course or event on which you are registered or have registered interest in.
4. To manage any account(s) for providing our online services so that we can provide you with the relevant products and services; access relevant course materials; to fulfil our services and communicate with you about them; to verify your identity; and send you marketing communications about qualifications, upcoming events and links to our blogs.
5. To personalise, report on and improve the services and products we provide to you, and to provide you with a best in class customer service experience.
6. To send you marketing communications including information about our qualification, upcoming events and links to our blogs.

Other legitimate interests

When we send you news regarding our products, we will do so on the basis that we have your consent. However, to allow us to provide continual best in class service, we believe we have legitimate interest to process your personal data so that we can:

- Improve our existing product range and services.
- Provide you with a best in class customer service experience.
- Protect you as our customer, our employees and our business.
- Understand your likes and dislikes, what services you wish to hear about and how best to contact you to inform you about them.

What personal data we collect

We may collect the following information about you:

- Your name, date of birth and contact details:

- This could include your postal address, telephone numbers and email address.
- Purchases and orders made by you.
- Your payment card details (which are encrypted) when you purchase any products or services:
 - Should you pay for one of our products or services over the telephone, your card details will not be recorded and kept by Cleverdotsolutions Limited.
- When you set up any account with us, your login credentials.
- Your marketing preferences.
- Your correspondence with us.

How we collect your personal data

When you directly provide it to us directly e.g. when you subscribe to a Cleverdotsolutions Limited newsletter or blog, or register on one of our courses or events.

When our systems collect information or personal data directly, for example whenever you use a website or mobile application. The most common type of information collected is in the form of cookies (cookies are small text files sent by your computer each time you visit our website), but can also include personal data transferred by the device you are using to access our website. The manufacturer of your device or the provider will have the details about what information your device shares.

Sharing your personal data with third parties

With **core service providers** to enable our business to function. We rely on a set of external companies who are governed by contractual agreement to provide us with services that enables our business to run effectively. For example, email marketing services, IT service providers for data storage and business continuity/disaster recovery, banks and clearing houses to process payments, courier services for the delivery of course materials and course Awards Body.

Dependant on course, we maybe required to provide exterior Exam Award Bodies like **ILM (City & Guilds Group company)** with some of your personal data for the purpose of identification and managing your examination, qualifications and results. This includes your name; your date of birth; and your email address. If you have any queries about how this information is provided and used, please email hello@cleverdotsolutions.co.uk.

Law enforcement agencies and **regulators** when required to do so by law. We are required to co-operate with regulations (like the Information Commissioners Office) and law enforcement agencies (like the police or the Serious Fraud Office). Although it does not happen often, regulators and law enforcement agencies can require us to share information with them as part of an investigation, this may include your personal data.

What personal data do we share

We need to process some of your personal data to fulfil your registration on any events or course. We will share your payment details with our bank or clearing house so that we can process payment for your purchases or orders.

How do we keep your shared personal data secure

We will only ever share data specific to its intended use. Specific details of what data we have shared is available to you on request.

Retention – how long do we hold your personal data

We will not hold your personal data for longer than is necessary for the purposes described in this policy.

We will keep your personal data whilst your accounts remain active.

We may keep categories of your personal data e.g. name, date of birth and address, after your accounts are closed to meet any legal or regulatory requirements.

Your rights

You have several rights under data protection law, these are summarised below however for further information you should contact hello@cleverdotsolutions.co.uk or seek further advice from the Information Commissioners Office (www.ico.org.uk).

1. The right to be informed

You have the right to total transparency on how we are using your personal data. We will endeavour to make this clear by ensuring that this document is regularly reviewed and updated, but if you have any concerns or questions, please send them to hello@cleverdotsolutions.co.uk.

2. Your right of access

You have the right to know what information we hold about you and how it is processed. If you wish to access your personal data, contact hello@cleverdotsolutions.co.uk. To process your request, we will ask you to complete a Subject Access Request (SAR) form and provide proof of identify so that we can be sure we are releasing your personal data to the right person. We will respond to your request within the guidelines set out in the SAR and in line with data protection guidelines.

3. Your right to rectification

If you think the information we hold about you is inaccurate or incomplete, or if your contact details change, please ask us to amend it by contacting hello@cleverdotsolutions.co.uk. We will process your request without delay and within the guidelines set by the Information Commissioner's Office.

4. The right to erasure

You reserve the right to ask us to delete your personal data, however, this is not absolute right. We can refuse to erase personal data that we need to keep in order to comply with legal obligations. For example, we are required by HMRC to keep personal data for up to 6 years for VAT reporting purposes, and in relation to investigations by law enforcement agencies or the Information Commissioner's Office.

When you ask us to delete your personal data, we assume that you no longer wish to hear from us again. To ensure we do not send you any further communications regarding our products or services in future, we will retain just enough of you personal data for suppression purposes.

5. The right to transfer your personal data (known as data portability)

You have the right to move, copy or transfer your personal data from one organisation to another. If you do not wish to transfer your personal data, we would be happy to help.

If you ask for a data transfer, we will give you a copy of your personal data in a structured, commonly used and machine-readable form (for instance, in a CSV file format). We can provide the personal data to you directly.

When make a transfer request, it would be helpful if you can identify exactly what personal data you wish us to transfer.

We will comply with your request within one month or, if the request is complex or there are several requests from you, within two months.

6. The right to object

If you would like us to stop processing your personal data for marketing purposes, simply let us know by contacting hello@cleverdotsolutions.co.uk.

Our promise

- That you control the personal data you provide to us.
- We will always inform you what personal data we are collecting from you, how we collect it and how we will use it.
- Where we make use of third parties for services and this involves sharing your personal data, we will make sure that they have the appropriate security measures.
- We will only send you marketing communications if you have given consent that we can do so, and we will always offer you a clear and simple means of amending your preferences whenever you wish.

Policy update

We may update this policy from time to time to take account of any new business activity or to reflect any changes in law or best practice in relation to data protection.

For the purpose for this Privacy Policy, the “personal data” we collects means any information that can be used to personally identify you online or offline, Personal information is only collected with your consent.