



## Privacy Policy (including Statement of Compliance)

### Policy Statement Overview

Everyone has rights regarding the way in which their personal data is handled. During the course of all activities iPET Network will collect, store and process personal data about Candidates and Training Providers and recognise that the correct and lawful treatment of this data will maintain confidentiality in the organisation and will support the successful business operations. The personal data collected will include but not limited to e-mail address, name, home or work address, DOB, educational information and contact numbers, ID information and therefore has been provided by you with your consent. Normally you will only provide such details:

- If you are making an enquiry about our products or services and wish to be contacted to discuss this in further detail.
- You have provided information to an approved Training Provider for registration on a qualification.
- You have enrolled and paid online for a Professional Development Recognition (PDR) course, where payment transactions are taken, your information is processed by Braintree (Paypal company).
- You wish to sign up for our e-newsletter or other resources.

iPET Network is committed to a policy of protecting the rights and privacy of individuals in accordance with the Data Protection Laws. The General Data Protection Regulation (GDPR) regulatory environment demands higher transparency and accountability in how iPET Network manages and uses personal data. It also accords new and stronger rights for individuals to understand and control that use. Data Users are obliged to comply with this policy when processing personal data on behalf of iPET Network. Any breach of this policy may result in disciplinary action.

### About the policy

This policy, and any other documents referred to in it, sets out the basis on which iPET Network will process any personal data collected from data subjects, or that is provided by data subjects or other sources.

On the 25th May 2018, the General Data Protection Regulation (“GDPR”) came into force in the United Kingdom and across all EU member states. The GDPR impacts each and every organisation that holds or processes personal data. Personal data relates to any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This policy does not form part of any employee's contract of employment and may be amended at any time.

This policy sets out rules on data protection and the legal conditions that must be satisfied when iPET Network obtain, handle, process, transfer and store personal data.

iPET Network regularly reviews this policy and its compliance with data protection laws. If you have any questions about this Policy or what iPET Network do with personal information, their contact details are set out in the "Contact" section below.

### About the data protection laws

The Data Protection Act 1998 (“DPA”) applies to any personal data that iPET Network process, and from 25th May 2018 this will be replaced by the General Data Protection Regulation (GDPR). In the UK the Data Protection Bill will become the Data Protection Act 2018 (DPA 2018) and will strengthen and extend the provisions of GDPR.

This Policy is written as though GDPR and the DPA 2018 (together “Data Protection Laws”) are both in force.



The data protection laws all require that the personal data is processed in accordance with The Data Protection Principles (on which see below) and gives individuals rights to access, correct and control how iPET Network use their personal data.

### **Your privacy rights and choices**

When it comes to how your personal data is collected, stored, used, and shared, you have rights and choices.

#### **a. Understanding your rights**

You have the right to request a copy of the personal data, restrict processing, correct inaccuracies, anonymise or delete, and transfer your data that we've collected about you, subject to limitations under applicable law. You may also have the right to review the outcome of certain automated decisions and request not be subjected to automated decision-making. If you want to exercise any of your rights, please contact iPET Network.

#### **b. Understanding your choices**

Here are some of the ways we communicate with you and the choices you have to limit these communications.

#### **How we communicate with you**

Your choices about how we communicate with you differ depending on the purpose of the message and how it is delivered.

If you use our services to pay for goods and services, we may contact you via email, telephone, text or send you paper mail. We do this when we reply to a message from you or when we have to communicate with you to comply with a law or other obligation. These messages contain important information and you may not opt out of receiving them.

Depending on how we send the marketing communications, you can click the unsubscribe link in any marketing email or email directly asking to be subscribed.

#### **Reason why we would communicate with you**

If you use our services directly or through a Training Provider, we may use your information to fulfil the obligation of the regulators, our Training Provider agreement and for our legitimate interests to:

- Communicate with you when you need us, such as answering a question you have sent to our team.
- Manage and improve our business.
- Protect our business and our customers from risk and fraud.
- Market our products, new qualifications and services.
- Improve the user experience of our websites and services.
- Comply with laws and enforce our agreements with you and other people who use our services.

#### **Compliance**

iPET Network is registered with the Information Commissioner's Office (ICO). This commitment has included taking a proactive approach to ensuring compliance with the GDPR. iPET Network will comply with obligations under the GDPR (The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) by following the Data Protection Principles below.

iPET Network is registered as a data controller with the Information Commissioner's Office (ICO). This commitment has included taking a proactive approach to ensuring compliance with the GDPR. iPET Network will comply with its obligations under the GDPR by ensuring that personal data is:

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes

- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date; taking every reasonable step to ensure that inaccurate personal data – having regard to the purposes for which it is processed – is erased or rectified without delay
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **Data Protection Principles**

The Data Protection Laws place a responsibility on every data controller to process any personal data in accordance with the following six principles:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; taking every reasonable step to ensure that inaccurate personal data – having regard to the purposes for which it is processed – is erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The Data Protection Laws also state that data controllers must ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **Data Protection Rights**

Under data protection laws individuals have certain rights in relation to their own personal data. In summary these are:

- The rights to access their personal data, usually referred to as a subject access request
- The right to have their personal data rectified
- The right to have their personal data erased, usually referred to as the right to be forgotten
- The right to restrict processing of their personal data
- The right to object to receiving direct marketing materials
- The right to portability of their personal data
- The right to object to processing of their personal data
- The right to not be subject to a decision made solely by automated data processing

Not all of these rights are absolute rights, some are qualified and some only apply in specific circumstances. Anyone wishing to exercise any of these rights should apply in writing to iPET Network.

When receiving telephone enquiries, iPET Network will only disclose personal data we hold on our systems if the following conditions are met:

- We will check the caller's identity to make sure that information is only given to a person who is entitled to it.



- We will suggest that the caller put their request in writing if we are not sure about the caller's identity and/or where their identity cannot be checked.

iPET Network employees will refer a request to the Responsible Officer for assistance in difficult situations. iPET Network will not tolerate any harassment or intimidation of its employees who are carrying out their duties in accordance with this policy.

#### **Security**

iPET Network has an obligation to put in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.

iPET Network has a separate employee Data Protection Policy which sets out the obligations of members of staff who are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties. iPET Network will ensure that all personal data is accessible only to those who have a valid reason for using it. iPET Network will have in place appropriate security measures such as password protecting personal data held electronically and ensuring personal data is accessible only to those who have a valid reason for using it.

Firewalls and virus checkers are kept up to date and running and users are trained in virus avoidance and detection. Computers are protected from physical harm, theft or damage, and from electrical surges using protective plugs. The organisation plans for how to deal with loss of electricity, external data links, Server failure and network problems.

#### **How long do we keep your personal data**

We retain personal data for the time necessary to fulfil your request, the regulators and our legal obligations. We may maintain personal data for longer periods if it is our legitimate business interests and not prohibited by law. If you no longer use our services, we may keep your personal data and other information as required by law and according to our data retention policy. If we do, we'll continue to handle it as we describe in this statement.

#### **How and why we share personal data**

We do not sell your personal data. However, we may share data across our services and with other Training Providers and the Regulators. Sometimes we also share the personal data we collect with third parties to help us provide services, protect our customers from risk and fraud, market our products and those who inquire about our services, and comply with legal obligations.

#### **Review**

We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or email.

The Policy will be reviewed annually.

#### **Contact**

iPET Network is responsible for ensuring compliance with the Data Protection Laws and with this policy.

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