

## GENERAL DATA PROTECTION REGULATION (GDPR) AND PRIVACY POLICY

### COVID-19 UPDATE

A new Tracking document will be in use to collate information about COVID cases, tests and symptoms of learners/staff/clients to enable EMD to maintain an overview of situation and identify instances where an 'outbreak' is confirmed. The following information will be gathered – Date / Learner Name / Class / Last Attendance / Learning Model Agreed / Situation / Agreed Action / Updates / Resolved Status.

The above information will be kept confidentially and only accessible by EMD staff.

A log in sheet will be in place alongside the QR Code. Every person attending an EMD site will be required to provide their name, contact details and complete a health questionnaire (COVID-specific).

The above information will be kept confidentially and only accessible by EMD staff.

The justification for the recording, monitoring and storing of the additional information is to enable EMD to meet its legislative and regulatory responsibilities in response to the COVID-19 pandemic.

### The Scope & Purpose

This privacy policy explains how we use any information we collect about you, how you can tell us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy. Effective from 25<sup>th</sup> May 2018, the GDPR regulation replaces the Data Protection Act 1998 to strengthen and unify data protection within the European Union.

The data controller is EMD UK CIC, 64 Daisy Hill, Dewsbury, WF13 1LJ.

### The Authority and Responsibility

This policy applies to all staff, customers and learners.

### Summary of our GDPR and Privacy Policy

Your privacy is extremely important to us so we only use the information you provide about yourself to provide our services or to help us to improve our service to you. We do not share this information with any third party except to the extent necessary to provide the services within the terms and conditions agreed.

### The information we collect

We may collect and process the following data about you:

- Your personal details as required by the Individual Learning Record, which enables EMD to provide funding for your course(s).
- Information that you provide by filling in forms or submitting your details on our site at [www.emduk.com](http://www.emduk.com) (our "Website"). This includes information provided when ordering from us or completing our enquiry form. This typically includes your name, your organisation's name, your position, email address, business address and contact

telephone number. We may also ask you for information when you report a problem with our website.

- If you contact us, we may keep a record of that correspondence.
- EMD UK CIC may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

### **Our use of IP addresses and cookies**

We may collect information about your computer for system administration and to analyse aggregate information. This is statistical data about the effectiveness of our online materials and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to user needs.
- To speed up your searches.
- To recognize you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

### **How we protect your information**

All information you provide to us is stored on our secure server. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

It is therefore at your own risk. Once we have received your information, we will use strict internal procedures and security features to try to prevent unauthorised access.

We also keep your information confidential. The internal procedures of EMD UK CIC cover the storage, access and disclosure of your information.

### **How we use your information**

We use information held about you in the following ways:

- To provide you with the education and training programmes you enrol on
- To provide you with information, advice and guidance that you request from us or which we feel may interest you
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to access secure areas of our Website when you choose to do so.
- To anonymously collate and analyse data such as ethnicity, age, disabilities and gender for the purposes of measuring EMD's compliance with equality and diversity legislation and local authority statistical monitoring activities.

We may also use your data to provide you with information about goods and services that may be of interest to you and we may contact you about these by email, SMS, post, via social media or by telephone.

If you do not want us to use your data in this way, please contact us.

### **When we might disclose your data to third parties**

We may disclose your personal information to third parties in a very limited number of circumstances:

- When accessing government funding on your behalf or on behalf of the company you represent
- When dealing with third parties essential for the provision of EMD services to you, such as the issuing of nationally recognised qualifications
- When representing you or the organisation you represent as part of on-going service provision, such as liaison with the Home Office or the Education and Skills Funding Agency
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If all of the assets of EMD UK CIC are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of EMD UK CIC, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.
- If safeguarding you or another person from harm requires disclosure of some or all of your data to relevant external services, e.g. social services or the police.

### **Your Rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us.

Our site may, from time to time, contain links to and from the websites of our clients and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You have the right to access information held about you by making a Data Subject Access Request. Any access request is free of charge.

### **Your consent**

By submitting your information you consent to the use of that information as set out in this policy. If we change our data protection and privacy policy we will post the changes on this page, provide information on the forms requesting your details and may place notices on pages of the Website, so that you may be aware of the information we collect and how we use it at all times. We will also e-mail you should we make any changes so that you may consent to our use of your information in that way. Continued use of the service will signify that you agree to any such changes.

**Policy Review**

This policy will be reviewed by the EMD management team annually, or more frequently as required, to ensure that it continues to be effective.