



Quality Management System  
IQV 016 – IQV Data Protection Policy

## **IQ Verify Ltd Data Protection Policy**

Also known as the Privacy Notice

### **Statement of purpose**

This policy sets out how we will look after your (data subject's) information. This includes what you tell us about yourself, what we learn about you, and the choices you give us about what marketing you want us to send to you. It also provides details of your privacy rights and how to exercise those rights with us.

We are committed to promote privacy and compliance by implementing a 'Privacy by Design' approach in our business activities. The policy can be found on the IQ Verify website; [www.iqverify.org.uk](http://www.iqverify.org.uk)

### **Related Policies, Procedures and Work Instructions**

- Data Retention Policy as part of the IQV QMS

### **Scope**

This policy applies to all data processed by IQV, and affects any person or company that may be considered a data subject that is processed by IQV. This includes employees, learners, subcontractors and company personnel.

### **Who we are**

IQ Verify Ltd (**Company number: 8406551**) is registered with the Information Commissioner's Office (ICO) - Registration number **ZA054651** (first registration 3 June 2014).

### **How we treat your information**

We aim to ensure that all personal data is:

- processed fairly and lawfully
- obtained and processed only for specified and lawful purposes
- adequate, relevant and not excessive
- accurate and kept up to date
- held securely and for no longer than is necessary.

We will process your data when we have a legal basis for processing it. In doing so, we will take appropriate technical and organisational measures to prevent your data from inappropriate disclosure. When a data breach occurs, we will take steps to inform you without unnecessary delay.

In processing your information we may provide it to relevant third parties such as our suppliers and enforcement agencies where we have a legal basis for doing so. We will never sell your personal information.

### **Where do we get your personal data at personal data do we collect?**

We may collect and process the following personal data:

### **Information which you freely provide to us**

For example when you:

- complete a survey or form,
- correspond with us by phone, e-mail, or in writing,
- sign up to receive notifications / messages from us,
- apply to work for us,
- enter into a contract with us to receive certification services.

We may need to collect personal information by law, or to enter into or fulfil a contract we have with you.



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If you choose not to give us this personal information, it may delay or prevent us from fulfilling our contract with you, or doing what we must do by law. It could mean that we cancel a certification service you have with us.

We sometimes ask for information that is useful, but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it won't affect the products or services you have with us.

#### **Information we collect about you on our website**

If you visit our websites, 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;
- 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.

We do this by using cookies, a small file that is sent by our web server to your computer, which we can access when you make return visits to our website.

#### **Information we receive from other sources / third parties**

As part of our role, we routinely collect and process personal data that is provided to us by our customers without direct access to data subjects.

If you are a customer or sub- contractor, we may receive information about you from your learning provider, or employer when they register to receive products and/or services from us. As an accredited certification body, we may also receive information about you from other statutory / governmental agencies, other or other certification bodies in order to protect the public confidence of our certification activities.

By providing personal information to us, you give consent to IQV to process the data as set out within this document, and you confirm that you have obtained the appropriate consent from the relevant individuals for the personal data to be processed accordingly by IQV. We reserve our right to refuse to process information received from you if we have reasonable suspicion that data subjects have not provided consent, or where we feel that there is no legitimate basis for processing.

#### **Information about other people**

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

We may refuse to process information about other people if we have reasonable suspicion that they have not provided their consent, or where we feel that there is no legitimate basis for processing.

#### **Sensitive personal data**

Sensitive personal information includes information about your:

- racial or ethnic origin,
- political opinions,
- religious or similar beliefs,
- trade union activities,
- physical or mental health condition ,
- sexual orientation
- details of any commission or alleged commission of offences
- genetic or biometric data



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In certain cases, we may need to process sensitive personal data from you. We aim to minimise collecting this information so far as possible, and will only collect and process this information if it is absolutely essential to do so, for example to confirm your qualification achievement or certification history. We aim to do so on the basis of your explicit consent unless there is a legal basis not to inform you, for example, where informing you would contravene money laundering legislation.

### **Personal data held for equal opportunities monitoring purposes**

Where personal data obtained is to be held for equal opportunities monitoring purposes, all such data will be made anonymous.

### **Why do we process your data?**

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**

To take steps to fulfil or linked to a contract:

- To provide products and/or services which we are contractually obliged to provide to you, your client or the organisation you work for in relation to the contract;
- To keep you updated with any information required in relation to contracted products and/or services between us;
- Discharge our duties as an employer.

### **Legal obligations / Public interest**

- To monitor certification achievement standards over time,
- To maintain records of achievement and confirm your or your business's achievements,
- To fulfil any regulatory or statutory obligations of the organisation, such as to provide information respond to any lawful or proportionate request by government authorities, law enforcement or statutory bodies,
- To promote public confidence in certification (for example to detect, deterring and preventing fraud or malpractice).

### **Vital interests of the data subject**

- To protect the safety and security of yourself or others as outlined within our QMS.

### **Overriding legitimate interests**

These interests may include our or a third party's interests, for example:

- For the purposes of good governance,
- To audit, analyse and protect systems and data from misuse,
- To maintain security, functionality and improve your experience on our website,
- To improve or develop our products and/or services,
- To monitor, analyse, and improve sales, organisational performance and business performance,
- To request for your consent to be contacted by us about relevant products / services,
- To conduct prospective research relevant to certification, standards that affect our organisation or our products / services,
- To collect outstanding debt owed to us,
- To resolve arising issues, complaints, claims, or disputes between us and you or your client.

### **Consent**

We will rely on your consent to:

- provide marketing or information which is not directly relevant to your contract with us,



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- process or transfer sensitive information where it is not required by a legal, public interest or overriding legitimate interest obligation.

### Marketing preferences

Each marketing email that is sent provides you with the ability to unsubscribe from receiving marketing emails at any time. Alternatively, you can change your preferences by sending a request to [info@iqverify.org.uk](mailto:info@iqverify.org.uk)

*(Please note that you cannot opt out of notifications / information related to a contract for products / services unless you terminate the contract itself).*

### Automated decision making

Although IQV uses automated means to process some information and assessments, no decision is currently taken entirely by means of 'automated decision making' as defined by the GDPR.

IQV may from time to time promote / provide information on social media websites such as LinkedIn, and Facebook that may conduct 'automated decision making' in relation to our communication notices we post on those sites. Your interactions with us on those platforms are subject to the terms and conditions of the respective sites, and you do so at your own risk.

IQV aims to track your engagement with us on the site in which it originates and limit the transference of information outside of those sites in accordance with best practice and the terms and conditions of those sites. We will not store or transfer your interaction within those sites outside of the relevant social media unless there is a proportionate and necessary legal basis for processing. If you have any concerns about how your information is used and the notifications you receive on those sites, you are advised to contact them directly.

### Sharing with third parties

We may disclose and share your personal information with:

- our service providers / contractors (for example, suppliers who develop or host our IT Services) to the extent where it is required to deliver certification services to you, or to uphold any overriding legitimate interest,
- external auditors, to the extent where it is necessary to assess our governance and compliance arrangements,
- law enforcement agencies, statutory organisations, governmental bodies or other relevant organisations where we have a legal or public interest obligation to do so,
- investigatory and fraud protection agencies, to verify your identity, prevent fraud and/or other criminal offences,
- to anyone we deem necessary to protect your vital interests, including the security / safety of yourself and / or other persons, as consistent with applicable law,
- debt collection agencies, to protect our legitimate business interests, for example to collect outstanding debt from your organisation),
- an acquiring entity, in connection with a sale, joint venture or other transfer of some or all of our company or assets (subject to the commitment of the acquiring entity to comply with this policy),
- in other situations with your consent.

Statutory bodies and government agencies we work with may include but is not limited to Her Majesty's Revenue and Customs (HMRC), Department for Work and Pensions, United Kingdom Accreditation Service (UKAS), ActionFraud, Serious Fraud Office (SFO), Health and Safety Executive (HSE), Information Commissioner's Office (ICO).

All of our service providers and contractors are contractually required to implement appropriate technical and organisational measures to meet the requirements of applicable law, and to process information only in compliance with it.

### International transfers



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IQV also operate a number of joint venture partnerships and customers outside the European Union. Data originating from these regions may be processed in the UK and transferred back to its origin country. Data originating from the European Union will not be processed outside the European Union unless it is essential, and even so, not without adequate technical and organisational safeguards.

### **Whistleblowing and malpractice**

In accordance with the conditions of accreditation, we may report to third parties such as other certification bodies and statutory bodies where we have reasonable grounds for suspecting that you have contravened IQV's Data Protection Policy or committed a relevant criminal offence.

We will only share your information with organisations so far as is reasonable to investigate any allegations that may affect the delivery of our products / services, or to fulfil our legal obligations under any conditions of recognition applied by a statutory body.

### **Your responsibility**

To protect personal information, you are urged to:

- notify us of any changes to your information / status to ensure your information is accurate and up to date,
- keep passwords safe,
- only access our services using secure networks,
- maintain updated internet security and virus protection software on your devices and computer systems,
- contact us immediately if you suspect a security or privacy concern or issue.

We may immediately suspend or terminate your access without notice if we become aware that you are in breach of our Terms and Conditions or of this Policy.

### **Providing validation of your achievements**

In order to provide a better service to our customers, your certification achievements can be independently validated by IQV through contact to IQV at [info@iqverify.org.uk](mailto:info@iqverify.org.uk).

Save for the provisions under this policy, we will not provide this information or confirm your achievements to third parties without your consent.

It is important that you keep your certificate safe, and that you do not disclose these details to third parties if you do not wish for them to verify your details. By providing this information to a third party, you are consenting for the person to verify your achievements through any verification service which we operate.

### **Purposes for which personal data may be held (employees)**

Personal data relating to employees may be collected primarily for the purposes of:

- recruitment, promotion, training, redeployment, and/or career development;
- administration and payment of wages and sick pay;
- calculation of certain benefits including pensions;
- disciplinary or performance management purposes;
- performance review;
- recording of communication with employees/students and their representatives;
- compliance with legislation;
- provision of references to financial institutions, to facilitate entry onto educational courses and/or to assist future potential employers; and
- Staff, volunteers and students, staffing levels and career planning.

### **Training**



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All IQV employees and relevant contractors are required to keep up to date with training and updates provided by the ICO regularly for advice and guidance on data protection issues and to aid CPD. Unauthorised access, amendment, deletion or transfer of records will be treated as gross misconduct / malpractice by IQV.

### Exercising your data rights

We aim to deal with any concerns which you may have about your information effectively and efficiently as part of our day to day operations with you.

If you have a concern about the way your data is used which cannot be addressed by the IQV representative you work with, write to [info@iqverify.org.uk](mailto:info@iqverify.org.uk), to formally exercise your legal rights, this will be taken up by the Managing Director for review and action where appropriate.

The form covers the following requests:

- subject access request (SAR)
- amendment / rectification request
- object processing
- restrict processing
- erasure
- data portability

We won't normally charge a fee unless it was reasonable and within the confines of the law.

For more information about how your rights apply, please see the ICO guidance at [ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/).

We aim to respect your request wherever possible however, please note that there are exception to when these rights may apply. If we are unable to comply with your request due to an exception, we will explain this to you in our response.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

We will usually respond to your request within 30 days of the receipt of your request, or at most, 60 days, if the information we hold about you is excessive.

### Event of a breach

In the event of a breach of your personal information, we will take reasonable steps to inform you wherever possible. We will also make best endeavours to inform the ICO within 72 hours of first finding the breach.

Our recovery time objective (RTO) is:

- 1 working day for minor breaches
- 5 working days for serious breaches

This may be longer in serious or complex cases.

### Retention of records

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any regulatory duty, public interest, or overriding legitimate interest.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for





which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For example:

- Credit card information is not stored, such information is processed directly on PCI DSS Compliant systems provided by payment / banking providers.
- Personal information relevant to staff at IQV approved learning providers is usually held for a minimum of 6 years after contract termination.
- Certification achievement information is normally held indefinitely as it is in both your and the public interest to be able to verify your certification achievements. Your assessment evidence and responses are retained so long as it is relevant to maintain the standards of assessment and achievement, up to a maximum of 6 years, as per the requirements of the IQV QMS.

For more information, please refer to IQV’s Data Retention Policy.

### How we process your information

Process	What data do we collect / process	Fields with Personal Data	Why do we collect / process the data?	Legal basis for processing
New Director	Personal	Name, Company, Address, Email, Telephone, CV, Companies worked for over last 2 years, signature	Register on Companies House, Evidence to UKAS	Contract, legitimate interest
New Impartiality Member	Personal	Name, Company, Address, Email, Telephone, CV, Companies worked for over last 2 years, signature	Evidence to UKAS the coverage of group	Contract, legitimate interest
New Auditor - given unique Auditor number and ID card	Personal	IQV number, Name, address, date of birth, telephone, Email address, Vehicle details, Next of kin, NOK telephone, competence, CPD, References contact details, Driving licence details, CV, qualifications, companies worked for over last 2 years, DBS check, photo, signature	Evidence to UKAS the competence of the auditor - ongoing	Contract, legitimate interest
Possible auditors	Personal	Varying amounts of Name, address, date of birth, telephone, Email address, Vehicle details, Next of kin, NOK telephone, competence, CPD, References contact details, Driving licence details, CV, qualifications, companies worked for over last 2 years, DBS check, photo, signature	Evidence to UKAS the competence of the auditor - ongoing	Contract, legitimate interest



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New Technical Expert - given unique number	Personal	IQV number, Name, address, date of birth, telephone, Email address, Next of kin, NOK telephone, competence / quals, CPD, References contact details, CV, qualifications, companies worked for over last 2 years, signature	Evidence to UKAS the competence of the tech exp- ongoing	Contract, legitimate interest
New Scheme developer	Personal	Name, address, email, telephone, competency, CV	Evidence to UKAS the competence of the scheme developer- ongoing	Contract, legitimate interest
New client / organisation - Given unique number	Personal and Company	Company name, company contact, address, phone number, email address, registered address, Owners - details - DOB - unspent convictions, signature, size of workforce, addresses	Evidence for audit duration and certification services we can provide.	Contract, legitimate interest
Quote for certification	Personal and Company	Company name, company contact, address, phone number, email address, registered address, Owners - details - DOB - unspent convictions, signature, size of workforce, addresses	To collect data to provide an accurate quote	Legitimate interest
New Learning Provider- Given unique number	Personal and Company	Learning provider name, address, company reg number, email address, website, Personal emails, competency, quals, credit check information, Personal details and role	Provide information for approval of Learning provider	Contract, legitimate interest
New Scheme development	Personal and Company	Learning provider name, address, company IQ number, contact name and email address, tel number	Needed to contact during development and annual update	Contract, legitimate interest
Audit - Organisation (Management, product, LP)	Personal and Company	Company number, address, contact at org, email and tel Insurance details, vetting and screening details, employee data	Collect evidence to make a certification decision	Contract, legitimate interest
Certification approval	Company information / comp Personal	Client ref, Client name, Address, tel number, client data	Provide record of decision to client	Contract, legitimate interest
Learning Provider approval	Learning Provider, LP Personal / Scheme	Director full name, director declarations, Staff full name, staff declarations, staff CVs, copies of certificates / CPD records, email address,	Collect evidence to make a certification decision	Contract, legitimate interest





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		phone number, address		
Certification - Organisations - Unique cert number provided	Company information	Client ref, Certification number, Client name, Address	Record certificates issued, dates for approval and dates for surveillance and date for re-cert	Contract, legitimate interest
Registration	Learner	Full name, DOB, Phone, Email, scheme registration, conflict of interest, pre-requisites, photo and signature, ID proof	Collect candidate data to record scheme obtained	Contract, legitimate interest,
Assessment booking	Learner	IQV LP number, Full name and DOB of candidates	Track assessments and papers sat	Contract, legitimate interest
Assessment booking confirmation	Learner	IQV LP number, Full name and DOB of candidates	Confirm assessment with LP	Contract, legitimate interest
Assessment booking (Invoicing)	Learning Provider / Learners	IQV LP number, Full name and DOB of candidates	Record of booking and number to invoice	Contract, legitimate interest
Assessment	Learners' assessments	IQV LP number, Full name, IQV reg number, DOB of candidates, answers, responses	to collect evidence to support certification decision	Contract, legitimate interest
Reasonable adjustments	Learner's personal data	IQV LP number, Full name, Reasonable adjustment, LP contact name, Signature	Collect evidence to support any adjustment	Contract, legitimate interest, legal
Marking assessments	Learner responses, learner performance	Full name, IQV Registration number (LP, Date, Responses)	to collect evidence to support certification decision	Contract, legitimate interest, public interest
Marking assessments (OMR)	Learner responses	IQV Registration number	to collect evidence to support certification decision	Contract, legitimate interest, public interest
Issuing Results	Learner, Qualification and Results data	IQV Registration number, Learner Full name	To conform results for certification of candidates	Contract, legitimate interest



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Standardisation	Learner, Scheme and Results data	IQV Registration number	To ensure any LP providing the same scheme are taking a consistent approach to delivery and results	Contract, legitimate interest, public interest
Special consideration	Learner's request for special consideration	IQV Registration number, Full name, LP staff name, Head of LP name, Personal impact / circumstances	To gather sufficient information to make a valid decision	Contract, legitimate interest
Enquiry about Results	Request for EAR / Review	IQV Registration number, Full name, LP staff name, Head of LP name, Personal impact / circumstances	To gather sufficient information to make a valid decision	Contract, legitimate interest, legal
Appeals	Request for an Appeal	IQV Registration number, Full name, Staff name, Head of LP name, (Result, Reasons)	To gather sufficient information to make a valid decision	Contract, legitimate interest, legal
Recognition of Prior Learning	Prior learning and skills - personal achievement	IQV Registration Number, Details of previous skills / employment / qualifications		Contract, legitimate interest, legal
Investigation	Details about malpractice / maladministration, including who may be involved / responsible	Details of staff, learners, other organisations, other people, employers involved, results, web registration info, potential address / contact details, details of malpractice allegations, details of corroborated / proven malpractice	To gather sufficient information to fully investigate and make a valid decision	Legitimate interest, legal, public
Investigation – Whistle blower	Whistle blower details and details of allegation	Name of whistle blower, contact details, IP address, details of whom the allegation is against including details against any staff / LPs/ learners	To gather sufficient information to fully investigate and make a valid decision	Legitimate interest, legal, public
Complaints	Complainant details and details of complaint	Name of complainant, complainant details, IP address, details of the complaint including any complaints against staff / LPs	To gather sufficient information to fully investigate and make a valid decision	Legitimate interest
Suppliers	Supplier information	Contact names, email address, phone numbers, address, signatures	Enable continued contact	Contract, legitimate interest



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Raise invoices	Company information and personnel at org	Company name, address, telephone number, contact. email address	To enable us to process through SAGE	Legal, contract, legitimate interest
UKAS update, scope extensions	Scheme	Company information	To ensure open communication and continued accreditation to standards	Legal, contract, legitimate interest
Issuing skills card	Skills card applicant	Full name, DOB, Phone, Email, (Address)	To provide a skills card with correct competence information	Contract
Due-diligence	Company name	Directors name, address, summary details, financial information	Due diligence of potential or actual customers	Legitimate interest

### Complaints

We take very seriously any improper collection or misuse of personal or business information. Please report it to us in accordance with IQV's QMS Policies at [info@iqverify.org.uk](mailto:info@iqverify.org.uk)

You can also complain to us in accordance with the IQV Complaints Policy.

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 the applicable supervisory authority or to seek a remedy through the courts. Please visit [ico.org.uk/concerns/](http://ico.org.uk/concerns/) for more information on how to report a concern to the UK Information Commissioner's Office.