

Privacy Policy of Traineasy Limited

1. Introduction

This privacy notice is a public declaration of how Traineasy Ltd applies the principles & rights afforded to individuals by the UK General Data Protection Regulation (UK GDPR), to the personal data that we store and process.

2. Who is collecting Data?

Data is being collected by Traineasy, whose registered address is Studio D2, Witan Studios, 334 Witan Gate West, Milton Keynes, MK9 1EJ. Traineasy is committed to complying with the 6 principles relating to the processing of personal data under the GDPR in all that we do. These principles are:

- Lawfulness, fairness & transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality

3. What data is collected and why?

We may collect, store and use personal information for the following uses:

a. Subscribing to website services and email notifications including:

- requesting a demonstration
- subscribing to either email notifications or newsletters

Once submitted via the Traineasy website, information that you provide for these purposes are stored within Traineasy's CRM HubSpot account, which is hosted in Europe. See <https://legal.hubspot.com/hubspot-regional-data-hosting-policy> for more information.

If consent has been given by you, we may use the information that you supply to tell you about new Traineasy products and services. You may unsubscribe from this service at any time.

Your information is retained for a period of no longer than 5 years, when it is automatically deleted.

b. Responding to voluntarily customer surveys, end of project reviews or providing other types of form-based feedback:

On submission, we store completed survey responses on Traineasy's secure internal network and disseminate them across related Traineasy business areas as part of continuous improvement activities. Where appropriate, and if used for ongoing reporting, the information is anonymised.

Personal data within such responses is stored for no longer than 3 years, when it is deleted.

If consent has been given, we may use the personal data that you supply to us to tell you about new Traineasy products and services.

c. On-boarding of new customers / suppliers:

A subset of personal data (name, address, key contact details), supplied during customer or supplier on-boarding activities is captured and used for legitimate business purposes only, to the extent of carrying out agreed contracted services.

These data are held on Traineasy's secure internal network.

Personal data of this kind is retained for no longer than 5 years or for up to 7 years when related to UK tax law requirements after which time, the data is deleted.

d. Customer-owned digital learning resources:

- Clients may upload documents, text, imagery, eLearning packages and videos (digital learning resources) to Traineasy's LMS platform.
- Traineasy holds such data for legitimate purposes only, as a service provider and sub-processor, on behalf of its customers.
- These assets are stored on AWS servers, and not used for any purpose other than allowing customers access to their learning materials and ensuring the continuity of the service.
- These data are backed up to encrypted media stored in the cloud (located within the UK).
- Uploaded content is never copied onto any form of removable media.
- Customers' content is not recreated or shown to anyone outside of the customer's organisation.
- Traineasy employees may view customers' uploaded content when providing technical support services only.

e. Information derived through using Traineasy LMS platforms:

Learners' access to digital training materials on the Traineasy LMS platform is tracked and can be seen in reports.

The collected data includes but is not limited to:

- Records or prior learning

- Quiz results
- eLearning completions including passes and fails
- Attendance and non-attendance on instructor-led courses.
- Learning plans and objectives
- Answers to pre-appraisal questionnaires
- Competency assessment results

Traineasy holds such data for legitimate purposes only, as a service provider and sub-processor, on behalf of its customers.

The Traineasy LMS platform user profile area allows learners to view and 'follow' their manager and other members of their team.

We do not use or access learner data, except to provide general usage statistics, and to allow customers to access and download their own data.

We never share these data, or use them for our own purposes, outside of what is detailed in this Privacy Policy.

f. Information derived from purchasing software on behalf of customer

Customer information required for the ordering of ELB Learning's software is shared with ELB Learning.

Customer information required for the ordering of Articulate software is shared with the UK distributor for these applications.

g. Information derived through the provision of services

Services include:

- the provision of technical support
- creation of e-learning
- management of LMS implementation projects.

Information derived through the provision of the services is never shared other than internally and for the purposes detailed above.

h. Information supplied by prospective job candidates

During periods of recruitment, we receive prospective candidates' CVs and contact details from the recruitment service Indeed.co.uk.

Details of unsuccessful applicants are deleted from Traineasy's files within 12 months of receipt.

4. **Lawful Basis for Processing**

We process your personal data for our legitimate business interests for operating our business and to fulfil contractual obligations with our clients. We may also process your data to comply with legal obligations we have with HMRC and other government bodies. For all other processing we will obtain your consent before using any of your personal data.

The information collected will be used for:

- Creating e-learning content on your behalf
- Orchestrating support services for our LMS software
- Purchasing software on your behalf
- Sending you general (non-marketing) commercial communications
- Administering the website including improve your browsing experience and enable your use of the services available on the website
- Sending you email notifications that you have specifically requested
- Sending to you our newsletter and other marketing communications relating to our business which we think may be of interest to you by email, or similar technology where you have specifically agreed to this (you can inform us at any time if you no longer require marketing communications)
- Dealing with enquiries and complaints made by or about you relating to the website, and services or other correspondence

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

5. **Sharing of your information**

We will not give, sell, rent or lease any personally identifiable information you choose to give us, to any other company. Unless we have your permission, or are required by law, we will only share data you provide, or in working with us, with employees and/or our suppliers, where appropriate.

Your information will not be shared outside of Traineasy or any specialist suppliers of content services, related to your specific project, unless required by law.

In addition, we may disclose your personal information:

- To the extent that we are required to do so by law
- In connection with any legal proceedings or prospective legal proceedings
- In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)
- To the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling; and
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion,

such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy statement, we will not provide your information to third parties.

6. International Transfers

Information that we collect may be stored, processed and transferred between any of the countries in which we operate in or supply from order to enable us to use the information in accordance with this privacy statement. International transfers outside of the EU, e.g. Capita India and the US will be managed under Privacy Shield agreed terms or via other adequate security assessments and data protection controls (including EU model clauses) to enable us to carry out our service obligations to our clients, suppliers and business partners.

All personal data stored and processed by us is securely stored within the European Union. There is no systematic transfer of data outside of the EU for any other purpose than outlined above.

7. Security of your personal information and retention

Traineasy takes information security extremely seriously.

We take all reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.

We will store all the personal information you provide on our secure (password- and firewall-protected) servers. All electronic transactions you make to or receive from us will be encrypted where possible.

Traineasy retains your personal information for as long as is necessary or as stipulated within client contracts and does not seek to retain data for any longer than necessary to carry out our service and fulfil our statutory and contractual obligations and comply with laws such as tax.

Once the data has reached the end of its retention period it is deleted. For further details on the Data Retention, please contact us using the details at the end of this document.

8. Statement Amendments

We may update this privacy statement from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

9. Your Rights

Traineasy recognises the further rights of data subjects under the GDPR which include

- The right to be informed
- The right to erasure
- The right to restrict processing
- The right to portability
- The right to object

- The right to withdraw consent
- The right to complain to the Supervisory Authority

You can read more about these rights here: <https://ico.org.uk/your-data-matters/>

10. **How to Contact Us**

You have the right to access the personal information we have registered about you and to request that this information is corrected or deleted if it is inaccurate, incomplete or irrelevant or to complain by contacting us using the details below:

Email enquiries@traineasy.com or send a communication by post to Studio D2, Witan Studios, 334 Witan Gate West, Milton Keynes, MK9 1EJ.

We can also be contacted via telephone on 01908 508777.

Should we receive an instruction from you about any personal information we hold about you, provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

If you are unhappy with our response, you have the right to complain to the Supervisory Authority, the details of which are below:

Supervisory Authority: Information Commissioner's Office (ICO)

Website: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk