
PRIVACY NOTICE

This Privacy Notice applies to Ecctis Limited and its operational entities: UK NARIC; Europass; the Centre for Professional Qualifications (CPQ); ECVET; and ReferNet.

Ecctis Ltd understands your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.naric.org.uk ('Our Site') and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law. This Privacy Notice states Our Privacy Policy.

Please read this Privacy Notice carefully and ensure you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site **OR** is requested at the time an individual service is ordered. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions

In this Policy, the following terms mean:

'personal data'	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 2018 and EU Regulation 2016/679 – the General Data Protection Regulation ('GDPR'); and
'We/Us/Our'	means Ecctis Ltd, a limited company registered in England, company number 2405026, whose registered address is Suffolk House, 68-70 Suffolk Road, Cheltenham, GL50 2ED, United Kingdom.

2. About Us

- 2.1 Our Site is owned and operated by Ecctis Ltd, a limited company registered in England, company number 2405026, registered address Suffolk House, 68-70 Suffolk Road, Cheltenham, GL50 2ED, United Kingdom and whose main trading address is the same.
- 2.2 Our VAT number is GB 535 71 04 56.
- 2.3 Our Data Protection Officer is Frazer Wallace. He can be contacted by email at dpo@ecctis.co.uk by telephone on +44 3003 038777, or by post at 68-70 Suffolk Road, Cheltenham, GL50 2ED, United Kingdom.
- 2.4 We are regulated by the UK Department for Education.

3. What does this policy cover?

This Privacy Policy applies to your use of Our Site. Our Site may contain links to other websites. Note that We have no control over how your data is collected, stored, or used by

other websites. We advise you to check the privacy policies of any other websites before providing any data to them.

4. Your rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy is designed to uphold:
 - 4.1.1 The **right to be informed** about Our collection and use of personal data;
 - 4.1.2 The **right of access** to the personal data We hold about you (see section 12);
 - 4.1.3 The **right to rectification** if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 13);
 - 4.1.4 The **right to be forgotten** – i.e. the right to ask Us to delete any personal data We hold about you (We hold your personal data for a specified time, as explained in section 6, but if you would like Us to delete it sooner, contact Us using the details in section 13);
 - 4.1.5 The **right to restrict** (i.e. prevent) the processing of your personal data;
 - 4.1.6 The **right to data portability** (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The **right to object** to Us using your personal data for particular purposes; and
 - 4.1.8 With respect to **rights concerned with automated decision making and profiling**, Ecctis Ltd does not perform automated decision making or profiling on personal data.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 13 and We will do Our best to help. If We are unable to assist, you have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens' Advice Bureau.

5. What data do We collect?

For Our qualification comparison and statement services for individuals, We may collect some or all of the following personal and non-personal data for the purpose of qualification and skills evaluation:

- 5.1 name;
- 5.2 contact information such as email addresses and telephone numbers;
- 5.3 information such as address and post code;
- 5.4 date of birth;
- 5.5 sex;
- 5.6 qualification details and attainment, including electronic copies of qualification certificates, transcripts, and related documents;
- 5.7 for services involving Primary Source Verification only, passport and/or National ID

card details and an electronic copy of the biographical data page from the applicant's passport or National ID card.

In using Our Site, We may collect some or all of the following data, to assist with fraud prevention and cybersecurity, and to enable Us to understand better the needs of Our users and so improve Our services for Our users and for Our customers:

- 5.8 your IP address;
- 5.9 web browser type and version;
- 5.10 operating system;
- 5.11 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

For Our organisational members and individual users of Our services for organisations, We may collect some or all of the following personal and non-personal data for the purposes of maintaining a list of registered users with logins, maintaining a record of training and development activities undertaken and events/conferences attended, and communicating relevant information to those users:

- 5.12 name;
- 5.13 contact information such as email addresses and telephone numbers;
- 5.14 information such as organisation's address and post code;
- 5.15 job title;
- 5.16 attendance at training/development sessions or events/conferences.

In using Our Site, We may collect some or all of the following data, to assist with fraud prevention and cybersecurity, and to enable Us to understand better the needs of Our users and so improve Our services for Our users and for Our customers:

- 5.17 your IP address;
- 5.18 web browser type and version;
- 5.19 operating system;
- 5.20 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

6. **How do We use your data?**

- 6.1 All personal data is processed and stored securely. We comply with Our obligations and safeguard your rights under the Data Protection Act 2018 or GDPR at all times. For more details on security see section 7 below.

As part of Our responsibilities as a Designated National Agency, performing services related to international qualifications and skills recognition on behalf of the UK Government, it is necessary for Us to maintain an archive of qualification certificates and transcripts for checking and training purposes, and as an important aid in the prevention of education fraud. Therefore We may choose to retain electronic copies of your qualifications and transcripts as part of this archive. If you do not wish your

qualification documents to be used in this way, please tell Us; by email at dpo@ecctis.co.uk; by telephone on +44 3003 038777; or by post at 68-70 Suffolk Road, Cheltenham, GL50 2ED, United Kingdom.

- 6.2 Our use of your personal data will always have a lawful basis; this may be contract, because it is necessary to process your data for Our performance of a contract with you; or consent, because you have consented to Our use of your personal data (e.g. by consenting to marketing emails); or legitimate interest, because processing your data is in the legitimate interests of Ecctis Ltd and/or its operational entities (e.g. by archiving international qualification certificates as a reference source for the purposes of checking, training, and fraud prevention).

Specifically, We may use your data for the following purposes:

- 6.2.1 supplying Our products and services to you (note that We require your personal data in order to enter into a contract with you, and We cannot supply Our services without processing your personal data);
- 6.2.2 personalising and tailoring Our products and services for you;
- 6.2.3 responding to emails/messages from you;
- 6.2.4 sending you emails from time to time, with relevant information, and feedback surveys about Our service to you, and research surveys finding out about your experiences of applying for study or work in the UK and your perceptions of the UK – you can opt out of receiving these emails by entering your email address [here](#) or by unsubscribing using the links provided in Our emails.
- 6.2.5 For Our organisational members and individual users of Our services for organisations, the above also applies.

- 6.3 The lawful bases that We use to process personal data are:

Contract – for performing qualification and skills evaluation and statement services for individuals; or for performing services for organisations or individual users of Our services for organisations;

Consent – for communications with you which have direct marketing purposes (this is for informing you about Our related services that may be of interest to you; We do not spam you and We do not sell your data to other organisations);

Legitimate interest – for retaining copies of qualification certificates and transcripts as a reference source for the purposes of checking and training and for prevention of education fraud; and for communicating with you to give you relevant information or to survey you – about your customer experience with Us or to research your experiences of applying for study or work in the UK and your perceptions of the UK.

- 6.4 Data will be retained for the following periods:

- 6.4.1 Personal data used for the provision of qualification and skills evaluation and statement services for individuals will be retained for a period of 25 years after the completion of the service to the individual. For the purposes of the prevention of fraud, UK NARIC is sometimes requested to verify statements

that it has issued. To enable cross-checking and verification to take place, it is necessary to retain personal data in Our systems for a period of time.

Many individuals using Our services do so to enter UK study or work and in order to find out more about your experiences of this as you go through courses of study or employment, We may from time to time send you research surveys during this period. Your personal data will be deleted after the period of time stated above. If you wish your personal data to be deleted before the expiry of this time period, you can request this by emailing dpo@ecctis.co.uk or using the contact details in Section 13. Note that if you do this, We will be unable to verify your UK NARIC statements if asked to do so by educational institutions, employers, government authorities or other agencies.

- 6.4.2 Electronic copies of qualification certificates, transcripts, and related qualification documents submitted with applications, will be deleted from Our application database 12 months after the completion of the service to the individual and Our last communication with you. Passport biographical data and/or National ID card data for services requiring Primary Source Verification will be deleted as soon as PSV processing has been completed.

However, We may choose to retain electronic copies of your qualification certificates and transcripts as part of an archive of qualification documents for checking and training purposes, and as an important aid in the prevention of education fraud. In these cases, the certificates will be retained in a secure section of Our server, for the duration for which the certificates are required. If you do not wish your qualification documents to be used in this way, please tell Us; by email at dpo@ecctis.co.uk; or by using the contact details in Section 13.

- 6.4.3 Personal data provided to Us by Our member organisations for evaluation purposes, e.g. qualification documents bearing names submitted as part of a member enquiry, will be retained for a period of 5 years. This will assist organisations in demonstrating compliance with Government, regulatory and best practice requirements.
- 6.4.4 Personal data which may be provided to Us by telephone may be recorded by Our system. This data will be retained for a period of 6 months.
- 6.4.5 For Our organisational member services, personal data relating to system users, maintained by members themselves, will be retained for a period of 6 months after the user is deactivated.
- 6.4.6 For Our organisational members, and individual users of Our services for organisations who are using Our training services or who are attending Our training/events/conferences, We will retain data relating to training and development activities undertaken and events/conferences attended for a period of 3 years. This will assist in maintaining Records of Personal Development.

- 6.5 You have the right at any time to request that We stop using your personal data, and to request that We delete it. Note that if you do this before We have completed a service to you, We will be unable to complete that service for you; and that We will be unable to communicate with you after your personal data is deleted.

- 6.6 If unsolicited personal or sensitive personal data is sent to Us, in any form, We will not retain the data and We will delete it.

7. **How and where do We store your data?**

- 7.1 For Our qualification comparison and statement services for individuals (excluding services involving Primary Source Verification) your data will be stored in the UK in Our secure internal IT systems, in Our secure on-site servers and in Our secure back-up servers and web servers.
- 7.2 For Our qualification comparison and statement services for individuals which require Primary Source Verification, and only for these individual services, We need to share your data with companies and organisations specialising in verification services. As qualification verification has to deal with different kinds of institutions worldwide, We use a range of selected companies and organisations in different parts of the world. Some of these companies and organisations will process your data outside of the European Economic Area (EEA) and therefore outside the usual jurisdiction of the General Data Protection Regulation (GDPR). You will be asked to give specific consent for this at the time of ordering services requiring Primary Source Verification, and provided with details of the specific companies and organisations. All such arrangements with verification companies and organisations are governed by appropriate agreements and contracts.
- 7.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure personal data collected through our site.
- 7.4 The measures We take to secure and protect your data include:
 - 7.4.1 Personal data is stored within a secure network, protected by the latest anti-virus, malware and intrusion prevention security software;
 - 7.4.2 Ecctis Ltd staff are trained in handling and processing personal data in a secure and sensitive manner.

8. **Do We share your data?**

- 8.1 We will not share your data with other companies/organisations unless you give Us explicit consent.
- 8.2 For Our qualification comparison and statement services for individuals which require Primary Source Verification, and only for these individual services, We need to share your data with companies and organisations specialising in verification services. As qualification verification has to deal with different kinds of institutions worldwide, We use a range of selected companies and organisations in different parts of the world. Some of these companies and organisations will process your data outside of the European Economic Area (EEA) and therefore outside the usual jurisdiction of the General Data Protection Regulation (GDPR). You will be asked to give specific consent for this at the time of ordering services requiring Primary Source Verification. All such arrangements with verification companies and organisations are governed by appropriate agreements and contracts.
- 8.3 When payments are made through Our Site, your payment details will be directly entered into Worldpay's secure payment portal. Your payment details are not stored in

Our systems. Worldpay is a UK-based company.

- 8.4 We may record and compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised when compiled and will not include any personally identifying data, or any anonymised data that can be combined with other data to identify you. We may from time to time share such anonymised statistical data with third parties, including HM Government for the purposes of Our reporting and accountability. Data will be shared and used in this way within the bounds of the law.
- 8.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, or where We are complying with legal requirements, a court order, or the orders of a governmental authority.

9. **What happens if Our business changes hands?**

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

10. **How can you control your data?**

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, we aim to give you control on Our use of your data for direct marketing purposes and there is a separate opt-in for these purposes. You also have the ability to opt-out of receiving informational, survey and other emails from Us, by unsubscribing using the links provided in Our emails.
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: the Telephone Preference Service (TPS), the Corporate Telephone Preference Service (CTPS), and the Mailing Preference Service (MPS). These may help to prevent you receiving unsolicited marketing. Note, however, that these services will not prevent you from receiving marketing communications you have consented to receiving.

11. **Your right to withhold information**

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

12. **How can you access your data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). No fee is payable. Contact Us for more details at dpo@ecctis.co.uk or use the contact details below in section 13.

13. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at dpo@ecctis.co.uk, by telephone on +44 3003 038777, or by post at Suffolk House, 68-70 Suffolk Road, Cheltenham, GL50 2ED, United Kingdom. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12 above).

14. **Changes to our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

10th September 2018

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