



DATA PROTECTION & INFORMATION ASSURANCE POLICY

Introduction

Cordie Ltd is fully committed to our compliance with the requirements of the Data Protection Act 2018. We will therefore follow procedures that aim to ensure that all employees, Associates, suppliers and business partners who have access to any personal data held by or on behalf of Cordie Ltd, are fully aware of and abide by their duties and responsibilities under the Act.

Overview

In order for Cordie Ltd to operate efficiently, we must collect information about the people with whom we serve, work and liaise. These may include customers, students, members of the public, current, past and prospective employees, Associates, suppliers and business partners.

Cordie Ltd recognises that this personal information must be handled properly under the provisions of the Data Protection Act 2018. The Act regulates the way that we handle the personal data that we collect in the course of carrying out our operations and gives certain rights to people whose personal data we may hold. This personal information must be handled and dealt with properly, howsoever it is collected, recorded and used, and whether it be on paper within structured filing systems, in computer records or recorded by any other means; and there are safeguards within the Act to ensure this.

We consider that the correct treatment of personal data is integral to our successful operations and to maintaining trust of the persons we deal with and as such Cordie Ltd is a registered 'data processor' with the UK's Information Commissioner under the Data Protection Act 2018 for the processing and storage of personal data (registration number Z9821275).

We are also fully committed to retaining our Cyber Essentials certification and require all of our employees and anyone who has permanent or temporary access to Cordie's digital data and IT infrastructure to adhere to our Staff Cyber Security Policy in conjunction with the requirements of this Data Protection & Information Assurance Policy.



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Information Covered by the Act

For information held by Cordie Ltd, personal data essentially means any recorded information held by us and from which a living individual can be identified. It will include a variety of information including names, addresses, telephone numbers, photographs of people and other personal details. It may include any expression of opinion about a living individual or any indication of our intentions about that individual.

Data Protection Principles

We will comply with the eight enforceable data protection principles by making sure that personal data is:

1. Fairly and lawfully processed and shall not be processed unless specific conditions are met
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate and where necessary, kept up to date
5. Not kept longer than necessary
6. Processed in accordance with the individual's rights
7. Secure
8. Not transferred to countries outside the UK.

Conditions

We will ensure that at least one of the following conditions is met before we process any personal data:

- The individual has consented to the processing
- The processing is necessary for the performance of a contract with the individual
- The processing is required under a legal obligation (other than one imposed by a contract)
- The processing is necessary to protect vital interests of the individual
- The processing is necessary to carry out public functions e.g. administration of justice
- The processing is necessary in order to pursue our legitimate interests or those of third parties (unless it could unjustifiably prejudice the interests of the individual).



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Under the Act, one of a set of additional conditions must be met for 'sensitive personal data'. This includes information about racial or ethnic origin, political opinions, religious and other beliefs, trade union membership, physical or mental health condition, criminal proceedings or convictions.

We will ensure that one of the following additional conditions is met before we process any sensitive personal data:

- The individual has explicitly consented to the processing
- We are required by law to process the information for employment purposes
- We need to process the information in order to protect the vital interests of the individual or another person
- The processing is necessary to deal with the administration of justice or legal proceedings.

Individuals' Rights

We will ensure that individuals are given their rights under the Act including:

- The right to obtain their personal information from us except in limited circumstances
- The right to ask us not to process personal data where it causes substantial unwarranted damage to them or anyone else
- The right to claim compensation from us for damage and distress caused by any breach of the Act.

Handling of Personal/Sensitive Information

All individuals acting on behalf of Cordie Ltd will be made fully aware of this policy and of their duties and responsibilities under the Act.

All Cordie Ltd employees will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure and in particular will ensure that:

- Paper files and other records or documents containing personal/sensitive data are kept in a secure environment
- Personal data held on computers and computer systems is protected by the use of secure passwords in accordance with Cordie's Staff Cyber Security Policy.



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All Cordie Ltd Associates, suppliers and business partners must:

- Ensure that they and all of their staff who have access to personal data held or processed for or on behalf of Cordie Ltd, are aware of this policy and are fully trained in and are aware of their duties and responsibilities under the Act. Any breach of any provision of the Act will be deemed as being a breach of any contract between Cordie Ltd and that individual, company, partner or firm
- Allow data protection audits by Cordie Ltd of data held on its behalf (if requested).

Legal Requirements

While it is unlikely, Cordie Ltd may be required to disclose personal data by a court order or to comply with other legal requirements. We will use all reasonable endeavours to notify the relevant individual(s) before we do so, unless we are legally restricted from doing so.

Our Commitment to Data Protection

We will ensure that:

- Everyone managing and handling personal information on behalf of Cordie Ltd understands that they are responsible for following good data protection practice
- There is someone with specific overall responsibility for data protection in the organisation
- Staff who handle personal information are appropriately supervised and trained
- Queries about handling personal information are promptly and courteously dealt with
- People know how to access their own personal information
- Methods of handling personal information are regularly assessed and evaluated
- Any disclosure of personal data will be in compliance with approved procedures
- We take all necessary steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure
- All Associates, suppliers and business partners who are users of personal information supplied by Cordie Ltd will be required to confirm that they will abide by the requirements of the Act with regard to information supplied by us.



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Implementation and Procedures

We have appointed a **Head of Information Compliance** to take the lead on data protection for Cordie Ltd. This person carries overall responsibility for ensuring that the policy is effectively implemented and monitored. All Cordie Ltd employees are contractually bound to comply with the Data Protection Act 2018 in principle. Other key employee roles are detailed below:

Data Protection Role	Name	Cordie Ltd Job Title
Head of Information Compliance (HIC)	Ian Thompson	Director
Key Responsibilities: <ul style="list-style-type: none">• Overall responsibility for Cordie Ltd's data protection activities and compliance• Advising and training staff on all aspects of data protection compliance, information security and assurance matters• Overseeing all information security incidents ensuring satisfactory resolution and future application of lessons learned• Development, review and application of this policy.		

Data Protection Role	Name	Cordie Ltd Job Title
Deputy Head of Information Compliance	Andrea Reynolds	Managing Director
Key Responsibilities: <ul style="list-style-type: none">• As per the Head of Information Compliance.		





Data Protection Role	Name	Cordie Ltd Job Title
Study Centre Data Controller	Al O'Reilly	CIPS Qualifications Programme Coordinator
Key Responsibilities: Supporting and implementing the data protection policy within those specific areas of the business responsible for by: <ul style="list-style-type: none">• Ensuring personal data is processed in accordance with the policy• Undertaking risk management of personal data• Ensuring appropriate retention and disposal of personal data held• Managing and reporting any security incidents• Responding to any personal data requests and cease data requests in accordance with the policy• Escalating any concerns or issues to the HIC.		

Data Protection Role	Name	Cordie Ltd Job Title
Apprenticeship Data Controller	Sarah Wallace	Apprenticeship Programme Coordinator
Key Responsibilities: Supporting and implementing the data protection policy within those specific areas of the business responsible for by: <ul style="list-style-type: none">• Ensuring personal data is processed in accordance with the policy• Undertaking risk management of personal data• Ensuring appropriate retention and disposal of personal data held• Managing and reporting any security incidents• Responding to any personal data requests and cease data requests in accordance with the policy• Escalating any concerns or issues to the HIC.		





Data Protection Role	Name	Cordie Ltd Job Title
Data Quality & Monitoring	Matthew McIntosh	Learning Administrator
Key Responsibilities: <ul style="list-style-type: none">• Undertaking regular auditing of data processing procedures• Reporting findings to the HIC• Advising on potential opportunities for improvement• Supporting with Cyber Essentials requirements.		

All personal information submitted to and held by Cordie Ltd will be treated as confidential and will not be shared or distributed with a third party, unless necessary for completing and/or protecting the vital interests of the individual.

Employees, Associates, suppliers and business partners should report any actual, near miss, or suspected data breaches to the Head of Information Compliance for investigation. Lessons learnt during the investigation of breaches will be relayed to all those processing information on behalf of Cordie Ltd to enable necessary improvements to be made.

Requests by a data subject for release of personal data must be received in writing and proof of identity will be sought prior to any release of personal data. No charge is made for this service, but Cordie Ltd reserve the right to charge should compliance with the request result in excessive time or cost to the business. Prior notice of any charge would be given to the data subject.

This policy and the appended Privacy Statement apply to all the operating divisions of Cordie Ltd. We reserve the right to amend the Data Protection & Information Assurance Policy and Privacy Statement from time to time. Thank you for your commitment to this policy and Privacy Statement.

Andrea Reynolds
Managing Director, Cordie Ltd



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APPENDIX – Privacy Statement

Introduction

At Cordie Ltd we do all we can to respect your right to privacy and the protection of your personal information. This is a detailed statement of what we do with your information in order to run our business and provide our customers with products and services.

Summary

This Privacy Statement sets out how we use and protect any information that you give us. It applies to data provided over the phone, by post, shared digitally including by e-mail or via online platforms such as our website, stored in our computer systems or in hard copy.

The personal data, in any format, that we collect and hold is important to us and is handled in accordance with this Privacy Statement. We are committed to ensuring that your privacy is protected. Where we ask you to provide information by which you can be identified when using our website, or any of our services, you can be assured that it will only be used in accordance with this Privacy Statement. We will always explain clearly what data we are collecting about you and why. We will only collect data we need to give you a better experience; to improve and deliver our services to you; and to meet our responsibilities to you.

The Basis For Processing Your Information And How We Use It

We will only use your personal information where one of the following applies:

- You have given us your **consent to contact you**, such as sending you marketing communications or information about third parties which we think you may find interesting. You can withdraw your consent any time by contacting us directly;
- To **interact with you** before you are enrolled as a student, as part of the admissions process (e.g. to send you a prospectus or answer queries about our courses);
- Once you have enrolled, to **provide you with the services** as set out in our Student Handbook;
- It is necessary for **performing a contract** that we have with you or your employer organisation;



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- To deal with **any concerns or feedback** you may have;
- For our own (or a third party's) **legitimate interests** provided your rights do not override these interests; such as
 - Fraud prevention
 - Sending suitable communications to you
 - Monitoring and improving our products and services
 - Enhancing the learning experience
 - Managing the data that we hold
- To comply with a **legal obligation**;
- For **any other purpose** for which you provide us with your personal data.

Your personal information will only be used for the purpose or purposes for which it was collected. It will not be sold, shared, or distributed to third parties unless we have your permission or where it is necessary for one of the reasons listed above.

The Information We Use

We collect and process various types of information. Most of the information will have been provided by you, or created through your use of our products and services. We also collect information from the technology you use when liaising with us.

In particular, we may collect the following information from you when you enrol as a student, book courses/exams, complete feedback or booking forms, provide services to us, or purchase goods or services from us:

- Your name, gender and date of birth
- Addresses (home & work), contact telephone numbers and e-mail addresses (home, work & mobile)
- Credit/debit card and/or bank details
- Employment status
- Career details – current role, job description, salary and any previous employment(s)
- Company name, address and contact information



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- Current qualifications and education history details
- Assessment information (e.g. exam results)
- Training undertaken as part of CPD
- Progress/scoring of online self-assessment tools
- Progress/scoring of online competency tools
- CIPS membership details.

Sensitive data that we may collect (including Special Category data as defined by the Data Protection Act 2018):

- Medical history/evidence (special requirements) where this is required for reasonable adjustments, special consideration, exam deferrals, or accommodating your attendance at study centre courses;
- Information about disabilities where this is required for reasonable adjustments;
- Information that you provide us when applying for special consideration or to defer an exam booking.

Where We Get This Information

We collect information from you, for example, when you:

- Make an enquiry with us
- Submit an enrolment or booking form, or to sit an exam
- Book onto a study centre/training course or an exam
- Purchase course books and/or other learning materials
- Choose to upload your information on to our Virtual Purchasing Academy (VPA) portal
- Use our website www.cordie.co.uk

We may also collect information about you from third parties, such as:

- Your employer or sponsor (e.g. where you have enrolled as one of our students on a professional qualification)
- Partners that we work with such as the Chartered Institute of Procurement and Supply (CIPS).



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What We Do With This Information

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- To respond to enquiries and provide customer service
- To enable your access to the Virtual Purchasing Academy (VPA) portal
- To fulfil our obligations arising from any contracts entered into between you (or your employer) and Cordie Ltd and for the general management of the same – including the products and services we offer
- To administer and manage the examination booking and assessment processes
- To organise and deliver training courses
- To process payments from or to you/your employer or sponsor
- To maintain CPD or Off-The-Job training records (where appropriate)
- To provide you with student updates (e.g. availability of revision webinars)
- To invite you to complete a feedback form for one of our courses/products/services
- To allow us to monitor progress statistics as a basis for continuous improvement of our website and Virtual Purchasing Academy (VPA) portal
- To monitor and improve our products and services
- To meet health and safety and security requirements where you attend a training course or examination
- To verify your identity
- To enable us to track system use by user (i.e. use of our learning materials on the VPA)
- Internal record keeping and compliance audits
- To periodically conduct quality checks on the data we hold on you.

Your Rights

You have a number of legal rights to control what we do with your information. You can ask us to make changes in how your data is handled and we will respond promptly should a request be made. Please note that in some cases, asking us to do this may mean that we are no longer able to provide you with our products or services.



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For clarity, you have the following rights to control what we do when holding and processing your personal data:

- **Right to be informed:** this Privacy Statement provides you with information in relation to how your data is processed. This ensures that we are transparent about what we will do with the information you supply to us.
- **Right of access.** You may request details of personal information which we hold about you under the Data Protection Act 2018. This is called a Subject Access Request. Further information on this process and how to apply may be obtained by contacting us directly.
- **Right to request information held is accurate and how to update it.** If you believe that any information we are holding on you is incorrect or incomplete, please e-mail us at info@cordie.co.uk and we will respond as quickly as possible.
- **Right to erasure.** In certain circumstances, you may ask us to delete information about you and stop processing or publishing it (often called the Right to be Forgotten).
- **Right to object to the processing that is likely to cause you damage or distress.** Where you challenge the accuracy or lawful processing of your information, we will consider this.
- **Right to receive an electronic copy of any information you have consented to us holding known as data portability.** You can ask us to provide the personal data about you we hold, securely and in a machine-readable format, so it can be moved, copied or transferred to be used across different services or for you to give to another organisation.
- **Right to object.** We will ensure that we have the right consents in place for sending you information. You can unsubscribe from our mailings and remove your details at any time. If you wish to stop receiving communications from us, you can do so by contacting us directly by telephone or by e-mailing info@cordie.co.uk.
- **Rights related to automated decision-making.** If there is additional profiling based on the information we hold, then you can object to us making decisions about you based on such processing.



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Recipients With Whom We May Share Your Data

We keep your information confidential and will only share your information outside of Cordie Ltd for the purposes mentioned in our Privacy Statement. This may involve sharing with third parties such as:

- Agents and organisations contracted to perform business functions on our behalf for the purposes of delivering products/services to you
- Regulatory bodies (where necessary for regulatory/audit requirements)
- Law enforcement agencies
- Third party IT and payment processing providers
- Third party analytical services
- Your employer or sponsor – we will only share information about you with your consent.

We may publish or share anonymised statistics under the condition that no personally identifiable information can be derived from such statistics by third parties.

Marketing

Unless you have told us not to, we may send you marketing information relating to products and services that we think will be of interest and relevant to you. If you change your mind and no longer want to receive these communications, you can tell us at any time by contacting us directly. Cordie Ltd will not share your information with third parties for their own marketing purposes without your permission.

Communications From Us

We use the contact details you provide to us to send you information relevant to the pursuance of your professional development, including e-mail, text, phone and post.

How Long We Keep Your Information

Cordie Ltd has a variety of obligations to keep the data that you provide. These include ensuring that transactions are processed correctly, identifying fraud, and complying with any laws and rules that apply to us and to our service providers.



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We will not hold your data for longer than is necessary. We hold the information that you provide to us while you are an active, registered student and when you register for our services. Even when the services have been delivered to you or you have completed your studies with us, we may keep certain data (such as student information required of us by professional bodies) to meet our obligations, but for no longer than required or permitted by law. Some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes.

Security

We are committed to ensuring that your information is secure with us and with third parties who act on our behalf. We use many tools to make sure that your information remains confidential and accurate. We have a comprehensive Staff Cyber Security Policy detailing our management approach to e-mail security in order to prevent unauthorised access or disclosure.

All incoming and outgoing e-mail is also scanned by multiple security systems before being accepted or sent out. These security systems will block and hold messages that contain viruses or malware, spam messages, or any other inappropriate content. Where appropriate, senders will be informed that their message has been held by our systems and if held in error, the message can be released and sent successfully.

Unfortunately, no data transmission or storage system is completely secure. If you feel that the security of your account or interaction with us has been compromised, please contact us immediately. If such a disclosure does occur, we will contact you as soon as possible to explain what has happened and take all steps required of us to meet our obligations under the Data Protection Act 2018.

A Note On Links To Other Sites

Our website may contain links to other websites or social media platforms of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that destination site. Therefore, we cannot be responsible for the protection and privacy of any information you provide while visiting such sites and such sites are not governed by this Privacy



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Statement. You should exercise caution and look at the privacy statement applicable to each site in question.

Complaints Process

If you wish to make a complaint about how we have processed your personal information then please contact us directly for a copy of our formal Complaints Policy. This details the process we will take to investigate and address any complaint received. If we cannot resolve your complaint, then you have the right to escalate your complaint to the Information Commissioner's Office:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

www.ico.gov.uk

This Privacy Statement applies to all the operating divisions of Cordie Ltd. We reserve the right to amend the Privacy Statement from time to time.

Andrea Reynolds
Managing Director, Cordie Ltd



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