

## **GENERAL DATA PROTECTION REGULATIONS POLICY (GDPR)**

### **Policy Statement & Introduction**

Proskills Global Limited is committed to ensuring that it remains compliant at all times with its legal obligations and responsibilities under the Data Protection Act (DPA) 1998 and the General Data Protection Regulations (GDPR). Data protection concerns personal data, i.e. information from which an individual can be identified. This includes data held on electronic systems and hard copies. Proskills Global Limited is registered with the Information Commissioner: ZA359287.

Proskills Global Limited is a professional independent expert that provides robust, comprehensive, quality assured certification and licencing for a wide variety of industries. All training we certificate is delivered by our approved training partners who undertake diligent and thorough audits annually.

In order to carry out its duties effectively and efficiently, Proskills Global has to collect and make use of personal information about individuals, employers, customers/clients, suppliers, consultants, employees, applicants for posts. Proskills Global is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal data.

### **Scope**

This policy is applicable to all personal data/information processed by Proskills Global or for Proskills Global purposes. It will apply to all staff, partner organisations, consultants or agents, assessors, Internal Verifiers and External Verifiers and third parties performing work for or on behalf of the business.

### **Responsibility**

Proskills Global Limited's Managing Director has overall responsibility for ensuring that this policy is implemented. These responsibilities are shown at Annex 1.

### **Updates**

From time to time we will make changes to this Privacy Policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy. This Privacy Policy was last updated on 14 May 2018.

## **WHAT THIS POLICY COVERS AND HOW IT WILL BE IMPLEMENTED**

### **Compliance with the Principles of the GDPR**

Proskills Global Limited collects the minimum amount of data and processes this fairly and lawfully.

The following candidate data is collected via the database for the purposes of registration, certification and reporting:

- Candidate ID
- Candidate surname
- Candidate forename
- Candidate ethnicity
- Candidate date of birth
- Candidate gender
- Special need requirements
- Date registered for the training
- Centre/venue where training was undertaken
- Issue date of Certificate
- Training /test results

Other personal data held, include contact details for External Verifiers, staff and Board members and consultants.

1. Obtains data only for specified and lawful purposes, and processes this for the purposes for which it was obtained, and for which the individual has agreed.
  - Data is used to enable the company to manage the operations of Proskills Global including training delivery and quality assurance of these through approved centres. Data is also used to enable the registration and certification of candidates, including the production of replacement certificates where required.
2. Collects data that it is relevant, adequate, and of proportionate.
  - The minimum amount of data is collected to enable Proskills Global to operate and to register and certificate candidates and to produce reports for management and the regulatory bodies.
  - Contacts details include name, address, telephone number(s) and email address.
3. Makes every effort to ensure that data held is kept up-to-date with regularly reviews of data held and cleansing of databases.
  - Contacts details will be reviewed periodically and all contacts required to verify that the information held is accurate. This excludes candidates as the data obtained is not ordinarily subject to change (address is not collected).
4. Keeps under review the length of time data is kept for, storing data for specific purposes only and not keeping for longer than deemed necessary
  - Data is retained as long as it serves the function for which it was obtained.
  - Candidate data is retained indefinitely for the purposes of replacement certificates, or verification of achievement
  - Data that is no longer required is shredded confidentially/deleted from the database.
5. Ensures that individuals are aware of the purposes of processing data supplied by them.
  - Centres collecting for the purposes of registration and certification are required to inform candidates of how the data supplied will be used.
6. Ensures that electronic systems that store data are secure and restricting access to these.
  - Data is stored securely.
7. Does not to transfer data to any country or territory outside of the European Economic Area.
  - Transfer of data is restricted.

### **Training**

Training on data protection aspects will be provided as necessary and as appropriate either using internal or external facilitation.

### **Related Information**

Within this policy statement there are references to other related policies and procedures which include:

- Employee Handbook
- Internet and Email Use Policy
- The Information Commissioner's Website <http://www.ico.gov.uk>
- All individuals that work for or with Proskills Global Limited have a responsibility to abide by this policy and associated procedures.
- Disciplinary action may be taken against staff in breach of data protection policy in line with HR Policy.
- If staff have queries on obligations under the Data Protection Act please direct them to the Managing Director in the first instance for advice.

### 4.2 Privacy Notices

1. The GDPR includes rules on giving privacy information to data subjects. These are more detailed and specific than in the Data Protection Act (DPA) and place an emphasis on making privacy notices understandable and accessible. The information that Proskills Global Limited provides about processing data is therefore:

- Concise, transparent, intelligible and easily accessible
- Written in clear and plain language, particularly if addressed to a child
- Free of charge.

Proskills Global Limited complies with the GDPR requirements by ensuring our privacy statement includes:

- Identity and contact details of Proskills Global Limited and the Data Protection Officer (MD)
- Purpose of the processing and the lawful basis for the processing
- The legitimate interests of Proskills Global Limited or third party, where applicable
- Categories of personal data/ any recipient or categories of recipients of the personal data
- Details of transfers to third country and safeguards
- Retention period or criteria used to determine the retention period
- The existence of each of data subject's rights
- The right to withdraw consent at any time, where relevant
- The right to lodge a complaint with a supervisory authority
- The source the personal data originates from and whether it came from publicly accessible sources
- Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data
- The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences

See Annex 2. Proskills Global Limited identify the legal basis for processing personal data before any processing operations take place by clearly establishing, defining and documenting the specific purpose of processing the personal data and the legal basis to process the data under:

- consent obtained from the data subject;
- performance of a contract where the data subject is a party;
- legal obligation that Proskills Global Limited is required to meet;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- official authority of Proskills Global Limited or to carry out the processing that is in the public interest;
- necessary for the legitimate interests of the data controller or third party, unless the processing is overridden by the vital interests, including rights and freedoms;
- national law.

Any special categories of personal data processed and the legal basis to process the data under:

- explicit consent obtained from the data subject;
- necessary for employment rights or obligations;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- necessary for the legitimate activities with appropriate safeguards;
- personal data made public by the data subject;
- legal claims;
- substantial public interest;
- preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, provision of health or social care treatment, or management of health and social care systems and services, under the basis that appropriate contracts with health professionals and safeguards are in place;
- public health, ensuring appropriate safeguards are in place for the protection of rights and freedoms of the data subject, or professional secrecy;
- national laws in terms of processing genetic, biometric or health data.

Proskills Global Limited record this information in line with its data protection impact assessment.

When personal data is collected from data subjects with consent Proskills Global Limited is transparent in its processing of personal data and provides the data subject with the following:

- Proskills Global Limited identity, and contact details of the (MD)

- The purpose(s), including legal basis, for the intended processing of personal data
- Potential recipients of personal data;
- Any information regarding the intention to disclose personal data to third parties. In such circumstances, Proskills Global Limited will provide information on the safeguards in place
- Any information on website technologies used to collect personal data about the data subject;
- Any other information required to demonstrate that the processing is fair and transparent.

When personal data has been obtained from a source other than the data subject Proskills Global Limited makes clear the types of information collected as well as the source of the personal data and provides the data subject with:

- The purpose(s), including legal basis, for the intended processing of personal data;
- Categories of personal data;
- Potential recipients of personal data;
- Any information regarding disclosing personal data to third parties – Proskills Global Limited will provide information on the safeguards in place;
- Any other information required to demonstrate that the processing is fair and transparent.

Privacy notice for this personal data processing is recorded.

**4.2 Data security breach**

Every care is taken to protect personal data from incidents (either accidentally or deliberately) to avoid a data protection breach that could compromise security. Notification of a personal data breach will be made by the (MD).

Data security breaches include both confirmed and suspected incidents. An incident is an event or action which may compromise the confidentiality, integrity or availability of systems or data, either accidentally or deliberately and has caused or has the potential to cause damage to Proskills Global's information assets and/or reputation. An incident includes but is not restricted to, the following:

Technical	Data Corruption; Malware; Corrupt Code; Hacking
Physical	Loss or theft of confidential or sensitive data or equipment on which such data is stored (e.g. loss of laptop, USB stick, iPad/tablet device, or paper record); Equipment theft or failure; Unescorted visitors in secure areas; Break-ins to sites; Thefts from secure sites; Loss in transit/post; Website defacement; Unforeseen circumstances such as a fire or flood.
Human Resources	Data Input errors; Non-secure disposal of hardware or paperwork; Inappropriate sharing; Attempts (failed or successful) to gain unauthorised access to information or IT system(s); Unauthorised disclosure of sensitive / confidential data; 'Blagging' offences where information is obtained by deceiving the organisation who holds it.

Proskills Global Limited will notify data subjects of any breach that may affect them. Notification will include a description of how and when the breach occurred, and the data involved. Clear advice will be given on what they can do to protect themselves and include what action has already been taken to mitigate the risks.

**4.3 Data Portability**

Proskills Global Limited informs data subjects of the existence of the new right to portability at the time where personal data is obtained. Data subjects may exercise their right to data portability and apply to Proskills Global Limited to receive their data in order to reuse or transfer it to other data controllers. Data subjects are entitled to ask:

- For a copy of the personal data they have provided to Proskills Global Limited
- For Proskills Global Limited to transmit the data to another data controller

Within this scope is any personal data concerning the data subject that:

- he/she has provided to the data controller knowingly and actively, or through observations of his/her activities by virtue of the service of Proskills Global Limited; and
- has been processed through automated means; and

- has been processed on the basis of the data subject's consent or a contract to which the data subject is a party.

This procedure will most commonly be used when transmitting data directly to another data controller. This procedure also applies to circumstances when Proskills Global Limited is the "receiving data controller".

Proskills Global Limited (as data controller/data processor) is responsible for transmitting the data without hindrance and ensure that it is transmitted with the appropriate level of security with encryption.

Any request is forwarded to the Managing Director to ensure that the requested data is provided/transmitted within the timeframe.

Where the data requested concerns a third party(ies), the Managing Director reviews whether or not transmitting data to another data controller would cause harm to the rights and freedoms of other data subjects. The data subject identifies the personal data that is to be transmitted or provided for their own use. The Managing Director maintains a record of requests for data and of its receipt. Proskills Global has set safeguards that ensure the personal data transmitted are only those that the data subject has requested to be transmitted.

Proskills Global Limited seek to provide the requested information within **one month** from the request date. If the request is complex, Proskills Global can extend this time frame to (maximum) three months. Proskills Global inform the data subject of any reasons for the delay.

Proskills Global Limited do not by default accept and process personal data received from another data controller following a personal data request nor does it retain all the data received. Proskills Global Limited only accept and retains data that is necessary and relevant to the service being provided.

### 4.3 Requests for information

Individuals are entitled to make requests to Proskills Global for copies of any information held about them. This is called a 'subject access request'. Proskills Global Limited will consider the request in accordance with the ICO publication 'Subject Access Code of Practice' (2014).

Information will be supplied where:

- a request in writing has been made
- the data can be located
- the identity of the applicant can be validated

Proskills Global will respond within **40 calendar days**.

If Proskills Global fails to act on a data subject's access request within the appropriate timeframe, or refuses the request, it sets out the reasons it took no action/refusal.

### 4.4 Monitoring

The implementation of this policy is monitored through internal audits as described in Proskills Global's Audit Policy and Audit Procedure. This includes the development of an Audit Plan to include Privacy Audits with the objective to ensure compliance with the General Data Protection Regulations (GPDR).

### 4.4 Complaints

Data subjects have the right to make a complaint to PGL relating to the processing of their personal data, Proskills Global's handling of requests from data subjects. Complaints should be directed to Proskills Global's Managing Director whose contact details are published on its website [[www.proskillsglobal.co.uk](http://www.proskillsglobal.co.uk)].

The Managing Director logs all complaints relating to data protection matters and is responsible for their resolution.

Data subjects have the right to complain direct to the Information Commissioners Office (ICO).

### 4.6 Requirements of approved centres

Approved centres must have their own data protection policy, the implementation of which may be audited at centre monitoring visits. Guidance for centre policies is included in the Centre Handbook.

## ANNEX 1: GDPR JOB PROFILE

### MAIN PURPOSE

To drive compliance with the EU General Data Protection Regulation (GDPR) and ensure ongoing compliance of all core activities for Proskills Global may form part of other roles.

### POSITION

The Managing Director also conforms as the Data Protection Officer, note that Article 24(1) states that data protection compliance is a corporate responsibility of the data controller, not of the Data Protection Officer / Managing Director.

### RESPONSIBILITIES

The Managing Director will maintain expert knowledge of data protection law and practices to ensure that Proskills Global Limited comply with the requirements of the GDPR.

The Managing Director (MD):

- must inform and advise on the protection of personal data in relation to the GDPR and law(s) and regulations
- will ensure that documentation to demonstrate compliance with the GDPR such as policies and procedures are kept up to date
- will plan and schedule data processing audits regularly, monitoring core activities to ensure they comply with the GDPR
- is the main contact point for employees and will liaise with all members of staff on matters of data protection

Key tasks of the Managing Director:

- a) To inform and advise all members of staff on their obligation to adhere to the GDPR and law(s) when dealing with personal data.
- b) To monitor compliance with the GDPR and law(s).
- c) Advise and inform on the data protection impact assessment (DPIA)
- d) Liaise and cooperate with the supervisory authority
- e) To contribute to the development and maintenance of all PGL data protection policies, procedures and processes
- f) Ensure training is available and delivered to staff
- g) Regularly monitor compliance with the GDPR and data protection law(s) by ensuring audits of processes relating to personal data
- h) To be the point of contact for data subjects with regard to the processing of their personal data
- i) To develop/advise on formal procedures for reporting incidents and investigations
- j) To contribute to the business continuity and disaster recovery planning process.
- k) Work with information asset owners to ascertain the extent to which personal data is collected, held and/or used in Proskills Global Limited and that it is properly controlled and safeguarded from loss of confidentiality, integrity or availability from any cause.
- l) To ensure that records of the processing are kept by Proskills Global Limited
- m) To advise the controller of its obligation to issue privacy notices to data subjects at the point of collection of their personal data
- n) To identify and test the controls and, where appropriate, to suggest additional controls, which may be established to maintain the confidentiality, integrity and availability of personal data.

The Managing Director is authorised to have access to all Proskills Global systems relating to the collection, processing and storage of personal data for the purpose of assessing the use and security of personal data.

DPO RATIONALE

Mandatory requirements for a DPO	Y/N	Comments
Is processing carried out by a public authority or body, (not courts)?  Is processing carried out by a court, but not in relation to the court's judicial capacity (e.g. courts processing personal data in their capacity as an employer)?	NO  NO	If yes, a DPO is required
Are you a national, regional or local authority?		
Do you carry out tasks on behalf of the public that are governed by public or private law in sectors such as: - public transport services - water and energy supply - road infrastructure - public service broadcasting - public housing - disciplinary bodies for regulated professions	NO	
Do the core activities of organisation name (controller or processor) consist of data processing operations? Do these activities require regular and systematic monitoring of data subjects on a large scale?	NO	If yes, a DPO is required
Are these activities performed at particular intervals for a particular period?		
Do they recur or are they repeated at fixed times?		
Do they constantly or periodically take place?		
Do they occur according to a systematic approach?		
Are they pre-arranged, organised or methodological?		
Are they part of a general plan for data collection?		
Are they carried out as part of a strategy?		
Do you conduct large-scale processing operations of special categories of data, or of personal data relating to criminal convictions and offences or related security measures?	NO	If yes, a DPO is required
How many data subjects are concerned?		
What is the volume of data being processed?		
What is the range of different data being processed?		
How long is the data processing activity?		
What is the permanence of the data processing activity?		
Does the data processed contain special categories such as: - Racial or ethnic origin - Political opinions - Religious or philosophical beliefs - Trade-union memberships		

<ul style="list-style-type: none"> <li>- Genetic data</li> <li>- Biometric data</li> <li>- Health</li> <li>- Sexual orientation</li> <li>- Criminal convictions and offences</li> <li>- Security measures related to criminal convictions</li> </ul>		
<b>Voluntary designation of a DPO * in addition to the above requirements</b>	<b>Y/N</b>	<b>Comments</b>
Have you considered the nature and scope of the processing?		
Have you considered the context and purposes of the processing?		
Have you considered the size, complexity and diversity of the processing against the business operations?		
Have these been reviewed and considered in conjunction with the acceptable level of risk to business as to whether appoint a DPO or not?		
<b>Business justification for not designating a (DPO):</b>		
Proskills Global are not a public authority, our core activities are not large scale and do not consist of large scale processing of special categories of data or data relating to criminal convictions and offences. Therefore, we are not required to appoint a Data Protection Officer. However, we do take compliance very seriously and conform with the GDPR.		

**ANNEX 2: PRIVACY NOTICE**

**Identity and contact details**

If you would like to discuss anything in this privacy notice, please contact: The Managing Director: [support@proskillsglobal.co.uk](mailto:support@proskillsglobal.co.uk)

**Purpose of the processing**

Proskills Global take your privacy seriously and will only use your personal information to administer your account, personalise your use of the website, and to provide the products and services you have requested from us. In order for 'users' to use some of our online services and to respond to enquiries we need to collect and process various personal data. The personal data we collect is used to process your request for our services. All information provided will be treated as confidential and will only be used for the purpose intended. Anyone can contact PGL to correct or update personal information in our records.

**What information do we collect?**

The sort of information we hold includes application forms; references; contact details; learner/candidate details; information needed for equal opportunities monitoring. If you contact us, we may keep a record of that correspondence.

**What do we use personal information for?**

We may use the information we hold about you to provide you with products and services requested by you. We use candidate data to issue certificates.

**Corrections/Accuracy**

We will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify Proskills Global of any changes to information held about them.

## The lawful basis

Proskills Global will process data for the specific and lawful purpose for which it is collected and not further process the data in a manner incompatible with this purpose.

We collect and use information for general purposes where:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- the data subject has given explicit consent to the processing of those personal data for one or more specified purposes

## Categories of personal data

We will ensure that the reason for which it collected the data originally is the only reason for which it processes those data. We will ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed

## Personal data

We may collect 'personal data' relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This may include the data subjects name, identification number, location data or online identifier.

## Sensitive Personal Data

We may, from time to time, be required to process sensitive personal data. Sensitive personal data include data relating to gender, race, and disability.

## Disclosure to third parties

We will not sell or license your personal information to any third party. However, we may disclose your personal information:

- to any member of Proskills Global
- contractors engaged by us to provide services on our behalf
- in order to provide you with any products or services you have purchased or requested
- the regulatory authorities.

## Details of transfers to third country

We will not transfer your personal information to countries outside of the European Economic Area that do not have adequate data security law.

## Retention period

Proskills Global may retain data for differing periods of time for different purposes.

## Data subject's rights

You have the right to request access to information about you that we hold. You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

Any data subject wishing to access their personal data should put their request in writing to the Managing Director at [support@proskillsglobal.co.uk](mailto:support@proskillsglobal.co.uk) who will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, within 40 days.

## The right to withdraw consent

Withdrawal of consent shall be without effect to the lawfulness of processing based on consent before its withdrawal.

- We make it easy for individuals to withdraw their consent at any time.
- We act on withdrawals of consent as soon as we can.

- We don't penalise individuals who wish to withdraw consent.

You may withdraw consent at any time by putting your request in writing to the Managing Director who will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, within 40 days.

**The right to lodge a complaint**

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance by contacting the Managing Director.

**The source the personal data**

All personal information provided to us is either stored on our secure servers located in the UK, or on the secure servers of sub-contractors that we have engaged to provide services on our behalf.

**Statutory or contractual requirements**

We will make you aware if we need to collect data for the purpose of statutory or contractual requirements. We will keep this data and use it to enable us to run our business and manage our relationship with you effectively, lawfully and appropriately.

**Websites and cookies**

This section applies to anyone accessing Proskills Global website. A cookie is a small file downloaded on to your device when you access Proskills Global website. Cookies allow the website to recognise your device. Session cookies will remember your selections as you browse the site. These cookies are for the browsing session and not stored long term. No personal information is collected by these cookies.

Google Analytics cookies help us to make the website better for you by providing us with user statistics, for example: which pages are the most visited; how a user navigates the site. No personal information is collected by these cookies.

You may delete or control the use of cookies through your browser settings, but this may limit the functionality of the website. The site and our computer systems have security measures in place with the aim of protecting the loss, misuse or alteration of the information 'users' provide to us. To find out more about cookies and what cookies might be stored on your device, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

**Consent**

Consent is required for Proskills Global to process both types of personal data, but it must be explicitly given.

I, [data subject name], hereby grant Proskills Global Limited and [third-party processor] authority to process my personal data for the purpose of purchasing Proskills Global's products and services.

Proskills Global will process data for the specific and lawful purpose for which it is collected and not further process the data in a manner incompatible with this purpose. We will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place. We will ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed

We collect information that you provide to us via our website, for example, the information you provide if you subscribe to our membership services, newsletters, request information, or purchase goods or services via our website. if you contact us, we may keep a record of that correspondence.

All information provided will be treated as confidential and will only be used for the purpose intended.

I am aware that I may withdraw my consent at any time.

Signed by data subject..... Date.....

**SUBJECT ACCESS REQUEST PROCEDURE**

**PURPOSE AND SCOPE**

Data subjects are entitled to obtain:

- Confirmation as to whether Proskills Global Limited is processing any personal data about that individual
- Access to their personal data
- Any related information
- The logic involved in any automated decisions relating to him or her.

**RESPONSIBILITIES**

The Managing Director is responsible for the application and effective working of this procedure, and for reporting on Subject Access Requests (SARs).

**PROCEDURE**

SARs are made using a Subject Access Request Form. The data subject provides Proskills Global Limited with evidence of their identity, in the form of a current passport/driving licence, and the signature on the identity must be cross-checked to that on the application form. The data subject specifies to Proskills Global Limited specific set of data held by Proskills Global Limited on their subject access request (SAR).

The data subject can request all data held on them. Proskills Global Limited provide the requested information to the data subject within one month from this recorded date.

Once received the SAR application is forwarded to the Managing Director who will ensure that the requested data is collected within the specified time frame.

Collection entails:

- Collecting the data specified by the data subject, or
  - Searching all databases and all relevant filing systems (manual files) in Proskills Global Limited, including all back up and archived files (computerised or manual) and all email folders and archives.
  - The Managing Director maintains a data map that identifies where all data in Proskills Global Limited is stored.
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|---|---|---|
| <ul style="list-style-type: none"> <li>• The Managing Director reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed. If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:</li> <li>• National security</li> <li>• Crime and taxation</li> <li>• Health</li> <li>• Education</li> <li>• Social Work</li> <li>• Regulatory activity</li> </ul> | <ul style="list-style-type: none"> <li>• Publicly available information</li> <li>• Corporate finance</li> <li>• Examination marks</li> <li>• Examinations scripts</li> <li>• Domestic processing</li> <li>• Confidential references</li> <li>• Judicial appointments, honours and dignities</li> <li>• Crown of ministerial appointments</li> </ul> | <ul style="list-style-type: none"> <li>• Management forecasts</li> <li>• Negotiations</li> <li>• Legal advice and proceedings</li> <li>• Self-incrimination</li> <li>• Human fertilization and embryology</li> <li>• Adoption records</li> <li>• Special educational needs</li> <li>• Parental records and reports</li> </ul> |
|---|---|---|

- Journalism, literature and art
- Research history, and statistics

In the event that a data subject requests Proskills Global Limited to provide them with the personal data stored by the controller/processor, then Proskills Global Limited will provide the data subject with the requested information in electronic format, unless otherwise specified. In the event that a data subject requests what personal data is being processed then Proskills Global Limited provides the data subject with the following information:

- Purpose of the processing
- Categories of personal data
- Recipient(s) of the information, including recipients in third countries or international organisations
- How long the personal data will be stored
- The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.

Proskills Global Limited remove personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject. Proskills Global Limited contacts and communicates with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.

Proskills Global Limited take appropriate measures without undue delay in the event that the data subject has: withdrawn consent; objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.

**SUBJECT ACCESS REQUEST FORM**

The Data Protection Act 1998 and the General Data Protection Regulations provides you ('the Data Subject') with the right to receive a copy of the personal data we hold about you. This form is used to confirm your identity and to assist us in locating your personal data. This form can also be used to confirm the identity and authority of someone making the request on behalf of the Data Subject.

Your request will be processed within 40 days of receipt by us of such information we may reasonably require satisfying ourselves as to your identity and to locate the information sought. A Subject Access Request is free of charge. All information disclosed under a Subject Access Request is a copy; originals are not provided. A Subject Access Request cannot be processed without the subject's (person whose details are being requested) signature. If you need any help completing this form, please contact Proskills Global Limited.

Section 1: Personal Details of the Data Subject							
Title	Mr		Mrs		Miss		Other
Full Name							
Date of Birth							
Address							
Previous Address is less than 2 years							
Telephone Number							
Email Address							
Section 2: Are you the Data Subject?							
Yes – if yes go straight to section 3	<input type="checkbox"/>						
No	<input type="checkbox"/>						
<p>If you are NOT the Data Subject, you must supply documentary evidence to confirm the Data Subject's authority which supports this request. We must see certified copies - one on which a person able to sign (e.g. Justice of the Peace, solicitor, medical doctor, professional person) has certified that it is a true copy of the original document.</p> <p>A representative is usually a legal company or anyone helping a friend or relative because the data subject is unable to take care of their own matters. Please note the date the authority is signed must be no more than six months older than the date the Subject Access Request is submitted.</p>							
Full name of the person representing the data subject							
Address							
Telephone Number							

Email Address	
<b>Section 3: What documents you must send or produce to confirm the identity and address of the data subject</b>	
<p>You must confirm the identity of the Data Subject by sending us a copy* of one of the documents listed below. Please tick the appropriate box to indicate which document you have enclosed. This must be certified by a solicitor; barrister; legal executive; professional person. This should be certified with the words: <b>"I certify that this is a true likeness of Mr/Mrs/Miss/Ms (full name)"</b> and <b>include the name, date and signature of the person certifying the document.</b></p> <p>If the Data Subject's name is now different from that shown on the document, you submit to confirm his/her identity, you must also supply documentary evidence* to confirm the Data Subject's change of name e.g. marriage certificate, change of name deed or statutory declaration.</p>	
a) Full valid driving licence	<input type="checkbox"/>
b) Birth certificate or adoption certificate	<input type="checkbox"/>
c) Full valid current passport	<input type="checkbox"/>
<p>You must also confirm the address of the Data Subject by sending us a copy of one of the documents listed below. Please tick the appropriate box to indicate which document you have enclosed.</p>	
a) Gas, electricity, water or telephone bill in the Data Subject's name for the last quarter	<input type="checkbox"/>
b) Council tax demand in the Data Subject's name for the current financial year	<input type="checkbox"/>
c) Bank, building society or credit card statement in the Data Subject's name for the last quarter	<input type="checkbox"/>
<p>We must see certified copies - one on which a person able to sign (e.g. Justice of the Peace, solicitor, medical doctor, professional person) has certified that it is a true copy of the original document.</p>	
<b>Section 4: How do you believe we process the personal data of the Data Subject?</b>	
<p>Our search for information relating to the Data Subject will be based on the information provided below. PGL processes personal data for the following purposes. Please tick the boxes next to the purposes that you would like us to search.</p>	
Accounts and records (for example purchases, sales or other transactions)	<input type="checkbox"/>
Advertising, marketing and promoting	<input type="checkbox"/>
Complaints and appeals handling	<input type="checkbox"/>
Information and database administration	<input type="checkbox"/>
Membership and registration	<input type="checkbox"/>
HR and employment records	<input type="checkbox"/>
Any other purposes not listed above?	<input type="checkbox"/>
<b>Additional Information:</b>	

Section 5: Formal declaration			
<p>In exercise of the right granted to me under the terms of the Data Protection Act 1998 and the General Data Protection Regulations I request that you provide me with a copy of the personal data about the Data Subject which you process for the purposes I have indicated. I confirm this is all of the personal data to which I am requesting access. I also confirm that I am either the Data Subject or am acting on their behalf. I am aware that it is an offence to unlawfully obtain such personal data, e.g. by impersonating the Data Subject. I certify that the information given in this form is true. I understand that it is necessary for Proskills Global Limited to confirm my/the Data Subject's identity and it may be necessary to obtain more detailed information in order to confirm my identity and/or locate the correct information.</p>			
Signed:		Date:	
Please make sure you have:			
Completed this form in full			<input type="checkbox"/>
Signed the declaration above			<input type="checkbox"/>
Enclosed the relevant documents of identity and authority			<input type="checkbox"/>
Enclosed the relevant documents of identity and address			<input type="checkbox"/>

Please send this form to: Proskills Global Limited, 35, Loyd Road, Didcot, Oxfordshire, OX11 8JZ.

**What happens next?** If your request is valid we will acknowledge your request in writing and provide you with a reference number relating to your SAR. If your request is valid but we are unable to identify you, we will advise you of this and close your request. We will also return your request along with any enclosures. If you have sent us an invalid request, then we will return your request along with any enclosures and advise you why your application has been rejected.