

Privacy Policy

- 1. Introduction
 - 1.1 Who we are and what this document is for

JP International Examinations (JPIE) is committed to data security and the fair and transparent processing of personal data. This privacy policy (the Policy) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular, the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights about your personal data, how to contact us and supervisory authorities if you would like to report a concern about how we process your data.

JPIE is a registered company with registered UK company number 07324751. Our registered address is 5 Imperial Court, Laporte Way, Luton, LU4 8FE.

For the purposes of the GDPR, JPIE is the 'controller' of the personal data you provide to us.

The prime contact for privacy and data protection matters at JPIE is James Pike, Managing Director. You may contact him by sending an email to <u>exams@ip-internationaltraining.co.uk</u>. Alternatively, please get in touch with any member of the JPIE team.

JPIE owns and operates <u>www.jp-international-examinations.co.uk</u> (the Website). This Policy, together with our Website terms of use and any other documents referred to, sets out the basis on which JPIE processes personal data.

2. What personal data do we collect?

We may collect and process the following personal data:

2.1 Information we collect about you

If you are a student, tutor/lecturer or administrator at a JPIE Approved Teaching Centre; we may receive information about you from the Centre when they register or liaise with us to receive products and/or services from us.

2.2 Information you provide to us:

If you:

- complete a form on our Website;
- complete a survey;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- register as a student directly with us;
- enter into a contract with us to receive products and/or services,



we may collect your name, date of birth, e-mail address, postal address, telephone number and other data that you supply at that time.

16 or under? If you are 16 or under, you must get your parent/guardian's permission before providing us with your personal information. Unless you have this consent, you cannot give us your information. We will not gather, hold or process any information without such consent.

2.3 Information about other people

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

2.4 Sensitive personal data

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so based on your explicit consent.

2.5 Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis, and the data is then removed from the system.

Overall, cookies help us provide a better website by monitoring which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you other than the data you choose to share with us. You can choose to accept or decline cookies. Some web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

3. How do we use your data?

When we ask you to supply us with personal data, we will make it clear whether the personal data we are asking for must be given so that we can provide the products and services to you or whether the supply of any personal data we ask for is optional.



3.1 Contract performance:

We may use your data to fulfil a contract or take steps linked to a contract:

- to provide the products and/or services to you;
- to communicate with you about the provision of the contracted products and services;
- to provide you with administrative support such as account creation, security, and responding to issues; and
- provide you with industry information, surveys, information about our awards and events, offers and promotions related to the products and/or services.

3.2 Legitimate interests:

Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by JPIE which may be of interest to you;
- communicating with you about any issues, complaints, or disputes;
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website;
- performing analytics on sales/marketing data, determining the effectiveness of promotional
- campaigns.

Note: you have the right to object to processing your personal data based on legitimate interests as set out below, under the heading Your rights.

3.3 Consent:

Where you have given your express consent to receive marketing communications, we may use your data to:

- send you newsletters, surveys, and information about our awards and events, offers, and promotions related to products and services offered by JPIE which may be of interest to you;
- developing, improving, and delivering marketing and advertising for products and services provided by a JPIE.

3.4 Where required by law:

We may also process your personal data if the law requires it, including responding to government or law enforcement requests or preventing crime or fraud.

3.5 Who do we share your personal data with?

We take all reasonable steps to ensure that our staff protect your personal data and know their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties, including:



- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with the provision of the products and services, such as providers of IT services and customer relationship management services; and
- analytics and search engine providers that assist us in improving and optimising our Website.

We will ensure there is a contract in place with the recipients listed above, which includes obligations concerning the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third-party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if applicable law requires it.

3.6 How long will we keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract and for an indefinite period following its termination or expiry to ensure we can comply with any contractual, legal, audit and other regulatory requirements or any orders from competent courts or authorities. Specifically, student registration and results data will be kept in perpetuity to enable us to confirm the validity of awards on request.

Where you have consented to receive marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us. Consent for marketing communications will be deemed to expire after three years unless renewed.

3.7 Where do we store your personal data, and how is it protected?

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures to deal with suspected data security breaches. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security



of your personal data transmitted to our Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

4. Your Rights

Under the GDPR, you have various rights concerning the use of your personal data:

4.1 Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address provided below. Please include with your request information that will enable us to verify your identity. We will respond within 30 days of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available would reveal personal data about another person if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

4.2 Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is inaccurate or changes so that we can keep your personal data up-to-date.

4.3 Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purposes for which they were collected, where you withdraw your consent to the processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data be erased, please get in touch with us using the contact details provided below.

4.4 Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed based on legitimate interests, and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you want to object to processing your personal data, please contact us using the contact details provided below.

4.5 Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example,

- you have contested the accuracy of the personal data we hold about you, and we are verifying the information,
- you have objected to processing based on legitimate interests, and we are considering whether there are any overriding legitimate interests, or
- the processing is unlawful, and you elect that processing is restricted rather than deleted.

Please get in touch with us using the contact details provided below.



4.6 Right to data portability

In certain circumstances, you have the right to request that some of your personal data be provided to you or another data controller in a commonly used, machine-readable format. This right arises when you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. Please get in touch with us using the contact details provided below if you would like to request that your personal data be ported to you.

Please note that the GDPR sets out exceptions to these rights. If we cannot comply with your request due to an exception, we will explain this to you in our response.

5. Miscellaneous

5.1 Contact

If you would like to contact us about this Policy, our use of your personal data, or exercise any of your rights, please get in touch with us. For further information or guidance, please contact: JP International Examinations

JP International Examinations 5 Imperial Court, Laporte Way, Luton, LU4 United Kingdom Tel: +44 (0)1582 594084 Email: info@JP-international-examinations.co.uk

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5.2 Complaints

If you believe that your data protection rights may have been breached, and we cannot resolve your concern, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts. Please visit https://ico.org.uk/concerns/ for more information on reporting a concern to the UK Information Commissioner's Office.

5.3 Changes to our Policy

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified by e-mail. Please check back frequently to see any updates or changes to our Policy.