

Privacy Policy



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Approved by: Roberta King

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Recent Amendment History:

Version	Date adopted	Nature of change	Summary of key changes	Approved by
1.0	1 June 2021	Initial version		Roberta King
2.0	15 January 2021	Yearly review		Roberta King
3.0	18 January 2022	Yearly review		Roberta King

1. Our contact details

Name: SQEPtech Ltd

Address: Heybury House
2 Heybridge Lane
Prestbury
Cheshire
SK10 4HD

Phone No: +44(0)7734 112102

E-mail: contact@sqeptech.com

Website: www.sqeptech.com

2. Purpose

This Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. It is important that you read this Policy so that you are aware of how and why we are using your personal information. Please contact us with any specific questions (contact details are given below).

3. The type of personal information we collect:

The information we collect about you may depend upon which of our products and services you use.

It may come from your employer as part of their using of our products and/or services. It may be collected from interacting with our products, or as part of any documents or forms you complete or from communications between us.

3.1 We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details, including email address and mobile phone number), postcode, and other data.
- details of your visits to our website, for example, traffic data, location data (including the country and telephone area code where your computer or access device is located) and the resources that you access (including the pages/areas of our website that you view); and
- information concerning your marketing preferences
- Information required for our services and products will be provided by your employer where they use our products or services:
 - For the eSQEP application in order to manage assurance of competences such as employment dates, company team/department/location, skills, behavioural competencies as well as certification documentation, dates, times of assessments including comments added by verifiers. We can also store extended HR information such

as Job title, organisation, location, manager, your photo and work contact details. All the data stored within the eSQEP application can be securely accessed from within the application by yourself and your system administrators with the required permission to do so.

- For SQEPpay, to facilitate the processing of your pay we hold your date of birth, personal email address, name, home address, national insurance number, tax code, gender, marital status, phone numbers, passport number (if you have let your employer know this), job title, the start and end date of your employment, salary details, hourly rate, hours worked, whether you have a student or post-graduate loan, attachment orders, your bank account number and sort code, bank name and branch, pension provider, details of benefits in kind (as part of your P11D).
- Users of vILT: Email addresses (sourced from Cornerstone so typically a work email although external training instructors could be using personal email address); User identifiers (CSOD User ID, CSOD Username, CSOD GUID, Teams/AD Username, Teams/AD GUID, Teams Membership Id).

If you provide us with personal information about another person, you must ensure that before you provide us with their personal information, you have their agreement to do so and that they are aware of the ways in which we use personal information as set out in this Policy.

4. How we get the personal information and why we have it:

Most of the personal information we process is provided to us directly by you or by your employer if they are using one of our services or products, for one of the following reasons:

- To use the products and/or services that we are providing your employer.

We use the information that you have given us in order to:

- carry out our obligations arising from any contracts entered into between you, or your employer and us;
- manage and administer the relationships between you, or your employer and us;
- comply with our legal obligations;
- notify you about changes to our services and to otherwise communicate with you or your employer; for example, we will use your contact details in order to respond to any queries that you submit to us;
- train our staff to continuously improve our services; and
- to analyse the efficacy of our services and marketing activity and to carry out market research relating to the application.

eSQEP:

The eSQEP application uses your data in order to allow you and your employer to manage your employees' competencies and the assurance evaluation process. The data used comes from your use of your employers HR systems (which may include the Learning Management Systems that are in use, for example, Cornerstone) and the data you enter directly into eSQEP

The application uses notification tools such as email in order to communicate status of the verification process as well as information between the employees of your organisation and to facilitate functionality such as action reminders and password resetting

SQEPpay:

The data that SQEPpay uses comes from your employer. It includes data you have given your employer (for example, whether you have a student loan) and from HMRC who will provide SQEPpay with your tax code.

The SQEPpay application uses your data to calculate your pay, national insurance, tax and other payslip deductions; and to provide you with your payslips and other pay related forms such as your P11D, your P60 and where appropriate your P45. It is used to ensure that you are paid, that you pay appropriate tax, national insurance, pension contributions and any payments required from attachment orders.

vILT:

The data that the vILT uses comes from your employer. This data is needed to add/remove people from teams and channels within Teams, add/remove people from Teams/Exchange calendar events, and feedback training attendance information to your employer's Cornerstone system. This data enables you to join vILT sessions that your employer invites you to join.

5. Who we share your data with:

We may disclose your personal information to third parties in connection with our operations and service. For example, we may pass your personal information to:

- third-party organisations that provide services to us (including assisting us with carrying out marketing and PR activities);
- external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity;
- third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us); or to protect our rights, property or safety or those of our customers, employees or other third parties.

For SQEPpay we share this information with HMRC as part of providing PAYE; and with your pension provider for your and your employer's pension contributions.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies and in line with current laws on data protection. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of the possible sale or reconstruction of the business. We may also need to share your personal information with a regulator or otherwise to comply with the law.

We will never sell or rent your personal information to any third party.

6. Lawful basis for processing this information:

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are:

(a) Your consent.

You are able to remove your consent at any time.

For eSQEP, vILT and SQEPpay: You can do this by contacting the appropriate person within your employer's organisation (this may be HR, the DPO or Payroll, for example)

For data we may have collected in relation to our website and our sales and marketing activities, you can do this by contacting contact@sqeptech.com

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task.

(f) We have a legitimate interest.

7. How we protect and store your personal information:

Keeping the data stored by SQEPtech Ltd safe is our highest priority and we work hard to ensure we do. We have put in place extensive security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, or third parties who have a business need to know. They will only use your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

The transmission of information via the internet is not completely secure; this risk is not specific to our platform and is common across the internet. We use secure connections and encrypt your data.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

Your information is securely stored in either UK or EU-based locations, depending on your employer's requirements.

We keep your personal information for time required by for the services provided and as per the contract we have with your employers; and to meet our legal obligations.

We will then dispose your information by secure methods.

8. Your data protection rights:

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at if you wish to make a request:

Address: Heybury House
2 Heybridge Lane
Prestbury
Cheshire
SK10 4HD

Phone Number: +44(0)7734 112102

E-mail: contact@sqeptech.com

9. Cookies:

Sqeptech.com site uses cookies. These are small text files that are placed on your machine to help the site provide a better user experience.

In general, cookies are used to retain user preferences, store information for things like shopping baskets, and provide anonymised tracking data to third party applications like Google Analytics.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

10. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Address: Heybury House
2 Heybridge Lane
Prestbury
Cheshire
SK10 4HD

Phone Number: +44(0)7734 112102

E-mail: DPO@sqeptech.com

You can also complain to the ICO if you are unhappy with how we have used your data:

The ICO's address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Policy approval

This policy has been approved & authorised by:

Name: Roberta King

Position: CEO

Date: 18 January 2022



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