



Data Protection Policy

Future Learning Systems Ltd

Last updated	1 st October 2019
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Definitions

Future Learning Systems	means Future Learning Systems Ltd whose principal place of business is at Missenden Abbey, Great Missenden, Buckinghamshire, England HP16 0BD with company number 3069648
GDPR	means the General Data Protection Regulation.
Responsible Person	means Paul Beckwith, Development Director.
The Customer	means corporate customers of Future Learning Systems.
Data Framework	means a register of all systems or contexts in which personal data is processed by Future Learning Systems.

1. Data protection principles

Future Learning Systems is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

- a) This policy applies to all personal data processed by Future Learning Systems.
- b) The Responsible Person shall take responsibility for Future Learning Systems's ongoing compliance with this policy.
- c) This policy shall be reviewed at least annually.
- d) Future Learning Systems shall register each year with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a) To ensure its processing of data is lawful, fair and transparent, Future Learning Systems shall maintain a Data Framework.
- b) The Data Framework shall be reviewed at least annually.
- c) Individuals have the right to access their personal data and any such requests made to Future Learning Systems shall be dealt with in a timely manner, typically within 10 days from request.

4. Lawful purposes

- a) All data processed by Future Learning Systems shall be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b) Future Learning Systems shall note the appropriate lawful basis in the Data Framework.
- c) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data. This consent may also be kept by The Customer for employees.
- d) Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately within Future Learning Systems' framework documentation.

5. Data minimisation

- a) Future Learning Systems shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b) Future Learning Systems shall only hold personal data in-line with the requests from The Customer and this data will not be used for any other purpose outside of that specified by The Customer, or required in order that Future Learning Systems may communicate with The Customer.

6. Accuracy

- a) Future Learning Systems shall take reasonable steps to ensure personal data is accurate.
- b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date and in the majority of situations Future Learning Systems will be reliant on The Customer providing personal data, that this is up to date and accurate.

7. Archiving / removal / sharing

- a) To ensure that personal data is kept for no longer than necessary, Future Learning Systems shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b) The archiving policy shall consider what data should/must be retained, for how long, and why. This is usually specified by The Customer and agreed between The Customer and Future Learning Systems.
- c) Future Learning Systems shall not share personal data with any other third party organisation.

8. Security

- a) Future Learning Systems shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b) Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted this will be done safely such that the data is irrecoverable.
- d) Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

- a) In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Future Learning Systems shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO. Individuals also affected by such a breach that may cause distress or damage will also be notified.