

## **Instinct Training LLP** **GDPR Compliance Document**

Instinct Training provides a system enabling the delivery of online training products, some generic and some bespoke, to groups of students registered to an individual company. This system also tracks the progress of each student through each training course and records this progress in terms of modules completed and the results of a self test if one exists (which it does for most Instinct titles).

In order to make use of this system a student is provided with a company ID and Password generated by Instinct Training. On entering this ID and PW the student is invited to register themselves onto the system unless their account has already been created by their employer or Instinct Training.

This registration process requires the student to enter as a minimum their first name, last name, a user ID and a password of their choice. Additional optional data which they may also provide at this point include an email address, work department, job title, job group and ID of their supervisor.

At this stage a unique System ID is generated which is used to identify all the data belonging to that student in the various tables of data. This System ID is used to easily find all the data belonging to an individual student if that student's data is required to be deleted.

On selecting a training course, a student record is created containing the identity information (System ID and Student ID) plus the time, date and course code. As the student progresses through the course this student record is continuously updated. Test results together with a total score and a pass/fail indicator are added to this record when the test is completed.

Details of courses completed are sent by email to the site administrator/s if required.

Registered students whose status on the system is set to either 'manager' or 'supervisor' will have access to all the above data relating to students registered to that account except for student passwords which will be hidden.

Different training accounts which all belong to the same company can be grouped together using a 'supermanager' code. In this case, registered students whose status is set to 'supermanager' can access the student details within all the accounts so grouped (apart from passwords).

The data described above is stored in a secure data centre controlled and administered by Positive Internet.

Instinct Training does not share any of the data described above with any other company (apart from Positive Internet who host the server).

Instinct Training does not use cookies except session cookies which are essential for the operation of the website.

Instinct Training takes the privacy and security of a student's personal details very seriously.

If a student forgets their password there are 2 options:

(1) If the student has an email address stored, then selecting a 'Forgotten Password' option sends a 7 character random code to the student's registered email address, that when entered back into the system permits him to create a new password.

(2) If the student does not have an email address he must request his manager/supervisor to reset the password and inform the student of the temporary password.

Students who forget their personal ID are encouraged to consult their manager/supervisor, who will personally know their students and be best placed to detect any attempt at fraud. If they contact Instinct Training in this regard they will be referred to their company manager/supervisor - Instinct Training will not divulge this information by email or by phone.

If the student has an email address stored then selecting a 'Forgotten ID' option sends an email containing the ID.

Passwords must conform to a minimum standard of at least 8 characters with at least one capital letter, one lower case letter and one digit. Passwords are encrypted to AES256 standard.

There are 2 ways in which a student's training record can be 'removed' from the system.

(1) Manager/supervisors and Instinct staff have the facility to make a student 'dormant' - this means that the student's personal details and training record remain available to view but the student is unable to login and use the training - the student's training records are easily re-instated by managers/supervisors.

(2) Manager/supervisors and Instinct staff have the facility to 'delete' a student - this means that the student's personal details and training record are not available to view and the student is unable to login and use the training - the student's training records can be re-instated only by Instinct staff and only at the request of the student's employer in writing, accompanied by the reason for the re-instatement.

Data is retained for 3 years after the cancellation of a contract. Shortly thereafter it will be permanently deleted unless retention obligations apply.

At the request of an authorised and recognised account administrator submitted in writing, data belonging to a specified student or group of students will be permanently deleted.