

# **IPMA-SA Certification Body**

## **DATA POLICY**

***February 2023***

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## Revision History

This document has been revised as follows:

Document Draft	Summary of Changes	Created / Changed By	Date
V1.0	First Draft	Mark Cawood	29 December 2022
V1.1	Final	Mark Cawood	20 February 2023

## Signoff

Date	Name	Designation	Signature
20 Feb 2023	M Cawood	Head CB	<i>Mark Cawood</i>

## 1 Introduction

### 1.1 Background

This Privacy Statement applies to all personal data that IPMA-SA CB processes from its clients, candidates, trainers and other interested parties. With personal data we mean information that can be traced back directly or indirectly to an individual, without the name of that individual having to be known. Think of a customer number, address, place of residence, e-mail address, telephone number and financial data.

### 1.2 Goals and Foundations

IPMA-SA CB processes personal data based on the following legal foundations:

- Executing an agreement like delivering products, services and customer service.
- To comply with a statutory obligation – e.g. financial report requirements.
- A legitimate interest, namely a commercial interest. Like offering services and products.
- Permission to process the data. For example for sending our newsletters.

The goals of processing personal data are:

- To deliver goods and/or services to you.
- Handling your payment.
- To be able to call, email or write you if this is necessary to carry out our services.
- Inform you about changes to our services and products.
- To send our newsletter or personalized offers regarding exams and other products.
- Assess and develop examinations.
- Comply with our obligations relating to assessments or examinations.
- Verify that an exam has not been fraudulently created.
- Issuing certificates and examination results by name.
- Verify the validity of certificates and provide information to the applicant.
- To inform you and respond to your questions.
- To provide a customer service.
- Analyses in order to improve our services.
- Accreditations to register and assess.

## 2 Records and Information Management

### 2.1 Records and information requirements

IPMA-SA CB shall ensure the following key records are maintained in Dropbox for at least 6 years:

- copies of all certificate data;
- contact details for all certificate holders; and
- copies of the final evaluation sheet and CB decision for all Candidates processed.

IPMA-SA CB shall ensure that it has gathered sufficient evidence in auditable form for the Candidate to be assessed and a decision on certification to be made. This information shall be held by the CB for auditing and, should it be necessary, appeals or complaints.

IPMA-SA CB certification records shall be identified, managed and disposed of in such a way as to ensure the integrity of the CB's certification information management process and the confidentiality of the information it contains.

## 3 Personal Data

### 3.1 Obtaining personal data

IPMA-SA CB obtains your personal data by various means. For example when you sign up for an IPMA course or exam or when visiting a session of IPMA-SA. If you apply through your employer or a training institution, we receive your information through these parties.

Data that IPMA-SA CB collects through its website can also be combined with data you provide us with at other moments. Like completing attendance forms for exams.

### 3.2 Personal data we process

We use the following information for the purposes stated in this privacy statement:

- Name and surname
- Date of birth
- Birthplace
- Phone number(s)
- E-mail address
- Postal address
- Bank account
- IPMA-SA Membership
- IPMA-SA Membership number
- Certificate number
- Certification level
- Company name of contact person
- Company phone number of contact person
- Company e-mail address of contact person
- IP Address

### 3.3 Recipients

#### 3.3.1 General

We will share your personal data with different third parties if this is necessary for the execution of the agreement and to comply with any legal obligation. With companies who process your data on our behalf, we arrange a processing agreement to ensure the same level of security and confidentiality of your data. We remain responsible for this processing.

#### 3.3.2 IPMA

Your personal data can be transferred to IPMA-SA or IPMA (international) on the basis of the goals and foundations as stated above. For instance if this is necessary for data operation and storage, to provide you

with access to our services, for customer support, to make decisions about the improvement of the service, for content developments and other purposes as described.

### **3.3.3 External service Providers**

We work with a limited number of external parties who have access to your personal data. All these parties IPMA-SA CB found to be reliable and they have signed agreements with us. In our agreements is stated what these parties have to comply with.

### **3.3.4 Public authorities**

We will only share your personal information with public authorities if required by law. For example, requests from courts, law enforcement agencies, regulators and other government and government bodies. Should we be required to do this the CB will inform the relevant candidate or certification holder.

## **3.4 Security**

IPMA-SA CB ensures that your personal information is provided with an adequate level of security in order to protect your personal information and to protect it from unauthorized use, unauthorized access, alteration, and wrongful destruction. We do this by means of two-step authorization procedures, applying passwords and encrypting data, among other things.

## **3.5 Retention period**

Your data will be kept by us for an extended period of time, but never longer than necessary to carry out activities or based on a legal arrangement where we keep your data longer. A per the ICR certification records shall be kept for a minimum of 6 years.

## **3.6 Invoice data**

We keep invoice data, on the basis of legal obligations, for 7 years.

## **3.7 Cookies**

We use cookies on our website to keep track of our site's visitor data, for research into possibilities for further optimization and for security of the website. Your information made available to us in this way is processed anonymously and only used in accordance with the law in a proper and careful manner. You can change the settings of your browser in such a way that you no longer receive cookies. In that case it is possible that not all services and functionalities of the website work properly.

## 4 Your rights

### 4.1 Introduction

As the person involved you have specific legal rights regarding the personal data we collect from you. This applies to all processing activities listed in this privacy statement. Below you find the information about your rights.

### 4.2 Right to withdraw consent

If the processing of personal data is based on your consent, you may withdraw this consent at any time. We guarantee that the permission can be withdrawn in the same way as it was given, such as electronic.

### 4.3 Right to rectification

You can ask us to correct your personal details. We make reasonable efforts to keep personal data in our possession or management that is used on a continuous basis, accurate, complete, current and relevant on the basis of the latest information available to us. In appropriate cases we offer portals where users can check and correct their personal data.

### 4.4 Right to restriction

You may, where appropriate, obtain restrictions from us on the processing of your personal data; such as:

If you dispute the accuracy of your personal data for the period necessary for us to verify its accuracy;

- the processing is unlawful and you request that the processing of your personal data be restricted instead of deleted;
- we no longer need your personal data but require it from you in order to establish, exercise or defend legal claims; or
- you object to the processing while we verify that our legitimate reasons take precedence over yours.

### 4.5 Right to inspect

You may ask us for information about your personal data, including information about the categories of personal data we hold or control, for which it will be used, where we collected it if not directly from you, and to whom it has been disclosed, if any. You may ask us to provide you with a free copy of any personal data we hold about you. We reserve the right to charge a reasonable fee for any other copy you request.

In certain situations, we may not be able to give you access to all or some of your personal data due to legal requirements. If we reject your request, we will inform you of the reason for this refusal.

### 4.6 Right to Transfer

Upon your request, we will pass on your personal data to another processing manager, if technically feasible, provided that it is based on your consent or if it is necessary for the execution of an agreement. Instead of receiving a copy of your personal data, you may request that we pass the data directly to another processing manager appointed by you.

## 4.7 Right to have data erased

We may erase your personal data on your request. For instance:

- When the personal data processing is no longer necessary in connection with the purposes for which they were collected or processed;
- You have the right to raise an objection (see below) to further processing of your personal data and you exercise this right to the processing;
- The processing is based on your consent, you withdraw your consent and there is no other legal reason for the processing;
- The personal data have been obtained illegally;

Unless the processing is necessary:

- To comply with a legal obligation for which we need to process data;
- In particular for legal retaining duties for data;
- For the determination, exercise or defence of a right in law.

## 4.8 Right to raise objections

You may object at any time to the processing of your personal data as a result of your specific situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this case, we will no longer process your personal data, unless we can demonstrate compelling legitimate reasons and an overriding interest in the processing or in the establishment, exercise or defense of a legal claim. If you object to the processing, state whether you want your personal data to be deleted or whether you want us to restrict the processing of your personal data.

## 4.9 Right to file a complaint

You have the right to lodge a complaint with the Personal data Authority if you feel that IPMA-SA CB does not correctly deal with your personal data.