

Data Protection Policy for REC ACADEMY

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1. Introduction

This Data Protection Policy outlines how personal data is collected, stored, processed, and protected within REC ACADEMY (the Learning Management System, or LMS). As part of REC, REC ACADEMY is committed to ensuring that personal data is handled in accordance with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

2. Purpose of the Policy

The purpose of this policy is to ensure that Personal Data is:

- Processed fairly, lawfully, and transparently.
- Collected and used for specified, explicit purposes.
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage
- Verified and accountable in its use

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

3. Scope of the Policy

This policy applies to all personal data collected and processed within the REC ACADEMY. It covers all users of the REC ACADEMY, including individuals, trainers, administrators, and any other individuals who provide personal data as part of the learning process.

4. Key Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person, such as name, contact details, academic records, or other identifiers.
- **Processing:** Any operation or set of operations performed on personal data, including collection, storage, use, and sharing.
- **Data Subject:** An individual whose personal data is being processed.
- **Data Controller:** The entity that determines the purposes and means of processing personal data. For REC ACADEMY, this is **[Institution/Organisation Name]**.

- **Data Processor:** A third-party entity that processes personal data on behalf of the data controller. This includes any third-party service providers supporting REC ACADEMY.

5. Data Collection and Use

Personal Data Collected: The following types of personal data may be collected and processed by REC ACADEMY:

- **User Information:** Name, email address, and contact details for account creation and communication.
- **Academic Information:** Enrolment details, course progress, and feedback.
- **Technical Data:** IP addresses, browser type, login times, and device information related to REC ACADEMY usage for system performance and security.

Purpose of Data Collection: Personal data will be used for the following purposes:

- Facilitating the learning experience (e.g., course registration, tracking progress).
- Communicating with users about course updates, events, and support.
- Assessing and reporting on performance.
- Ensuring the security and proper functioning of the REC ACADEMY.

Legal Basis for Processing: Personal data will be processed based on the following lawful bases under the GDPR:

- **Consent:** Where users provide explicit consent to process their data for specific purposes (e.g., receiving newsletters or promotional content).
- **Contractual Necessity:** Processing required to fulfil a contract with users, such as course enrolment and assessments.
- **Legal Obligation:** Processing required to comply with legal obligations (e.g., maintaining academic records).

6. Data Retention

Personal data will be retained for as long as it is necessary to fulfil the purposes outlined in this policy, or as required by law. Once the data is no longer required for these purposes, it will be securely deleted.

Retention Periods:

- **User Account Data:** Retained for as long as the user maintains an active account. Inactive accounts will be archived or deleted after a one-month period.

Further information can be found within the REC ACADEMY - Retention Policy.

7. Data Protection Rights

Users have the following rights in relation to their personal data:

- **Right to Access:** Users can request access to the personal data held about them.
- **Right to Rectification:** Users can request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** Users can request the deletion of their personal data when it is no longer necessary for the purposes it was collected.

- **Right to Restrict Processing:** Users can request to restrict the processing of their data under certain circumstances.
- **Right to Data Portability:** Users can request a copy of their personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Users can object to the processing of their personal data under certain circumstances.

Requests to exercise these rights should be made to training@rec.uk.com.

8. Data Security and Protection

REC ACADEMY will implement appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, alteration, and destruction. This includes:

- Use of encryption for sensitive data.
- Regular security assessments and audits.
- Secure login systems (e.g., two-factor authentication, Single Sign On (SSO)).
- Data backup and disaster recovery plans.
- Regular staff training on data protection best practices.

Third-Party Processors: Where third parties are used to process personal data on behalf of REC ACADEMY, such as cloud services or support providers, these third parties must comply with strict data protection requirements, including the use of data processing agreements.

9. Data Breaches

In the event of a data breach that compromises the confidentiality, integrity, or availability of personal data, REC ACADEMY will notify affected individuals without undue delay, as required by the UK GDPR. The institution will also report the breach to the Information Commissioner's Office (ICO) within 72 hours, where necessary.

10. Responsibilities

- **Data Controller:** REC, REC ACADEMY, and SuperBiller are responsible for ensuring compliance with this policy and data protection laws.
- **Users:** All users of REC ACADEMY are responsible for ensuring that the personal data they provide is accurate and up to date.

11. Contact Information.

For any questions regarding data protection or to exercise data protection rights, these should be made to training@rec.uk.com

12. Review and Amendments

This policy will be reviewed regularly and updated as necessary to ensure compliance with data protection laws and to reflect changes in the way REC ACADEMY processes personal data. Users will be notified of any significant changes to this policy.

13. Acknowledgement

By using the REC ACADEMY, users acknowledge and agree to the terms outlined in this Data Protection Policy and consent to the collection and processing of their personal data in accordance with this policy.