

**Vital Life Solutions Ltd will process your personal data, and special category data (for the purpose of reasonable adjustments), in accordance with the General Data Protection Regulation (GDPR) and any regulatory requirements as specified by Vital Life Solution's Regulatory and Awarding Bodies.**

Vital Life Solutions Ltd will only process and store your data for the purposes of the delivery, assessment, and award of the qualification/ course you have chosen to undertake and for no other purpose.

We may share personal data with third parties where necessary for the provision of regulated qualifications. This includes sharing data with Nuco Training Ltd and the First Aid Awards Ltd (FAA) to comply with regulatory requirements. Vital Life Solutions Ltd will not sell, pass on or make available your personal, or special category data, to any other person or body outside of the administration and award of the qualification/course you have chosen to undertake.

Vital Life Solutions Ltd will undertake the following administrative activities in relation to the processing and transfer of your personal and special category data:

1. Vital Life Solutions Ltd collect your personal and contact details for the purposes of administering and awarding/ certifying the qualification/course you have chosen to undertake.
2. Vital Life Solutions Ltd offers you the ability to apply for a reasonable adjustment should you have a disability, learning need or medical condition that may affect your ability to undertake the qualification's assessment. The data collected for this purpose is called special category data. Vital Life Solutions Ltd will only collect and process this special category data when it is provided by you and for the purposes of recording and awarding reasonable adjustments for the qualification/course you are undertaking at the time of providing the data.
3. Such personal data and special category data will not be used by Vital Life Solutions Ltd for any purpose other than the delivery, assessment, administration and quality assurance of the qualification/course undertaken and for maintaining appropriate records in line with Regulatory Body requirements.
4. Personal data and special category data is collected within course paperwork/documentation during course delivery. For regulated qualifications, the data will be transferred to NucoPlus' online administration system. The transfer of learner data to NucoPlus is required as part of the process of administering and awarding qualifications and all records will be maintained/disposed of in line with the Vital Life Solutions Ltd and Nucoplus' Data Protection Policy.
5. Where a certificate is issued by an awarding body, normally in the case of a regulated qualification, we will be required to securely transfer your personal data to the awarding body for them to issue your certificate. The data will only be used for this purpose and for anonymised statistics requested by the Regulatory Bodies.
6. Vital Life Solutions Ltd is required to respond to information requests from Regulatory Bodies. Should your data be required to be transferred to the Regulatory Body, Vital Life Solutions Ltd will do so in line with its Data Protection Policy. The same process will be used if Vital Life Solutions Ltd is legally required to transfer data as part of a legal investigation to a legal authority.
7. If you have not reached the age of 16, you may first wish to discuss this Privacy Notice with your parent, guardian or carer.
8. Vital Life Solutions Ltd will retain your personal and special category data for up to 6 years to provide confirmation of your achievement at any point in the future, should it be required. An individual can request that their data is deleted at any stage.
9. Under the GDPR you have certain rights in respect of your personal and special category data. Not all GDPR rights are applicable due to the limited way in which Vital Life Solutions Ltd holds and processes your data, but the following rights are appropriate:

- Right to access to the information we hold on you. This will be provided to you free of charge within one calendar month of your request.
- Right to rectification. Should any of the data Vital Life Solutions Ltd hold on you be incorrect you have the right for this to be rectified. Vital Life Solutions Ltd will always strive to enter data accurately, but should you notice an error please contact Vital Life Solutions Ltd and we will rectify any inaccuracies.
- Right to erasure. Vital Life Solutions Ltd are required to process your personal data (name, email address and date of birth and gender and postcode if given), and special category data (in the case of a reasonable adjustment being awarded due to a medical condition, disability or learning need), to administrate the award of your qualification/training. Vital Life Solutions Ltd are also required to maintain the records of your training. Should you wish for your data to be deleted Vital Life Solutions Ltd will do so upon reasonable request providing it is no longer required to maintain a record of your training.

### **What data do we keep?**

All data is generated through the completion of official course paperwork/documentation. Full course paperwork packs must be retained for three years and six months from the final date of the course to provide evidence of a learner's achievement.

### **How do we securely hold course paperwork/documentation?**

Course paperwork/documentation can be stored in either hard copy 'paper' format or in an electronic document such as Word or PDF.

#### **Hard copy 'paper' format**

When data is stored in hard copy format Vital Life Solutions Ltd ensure that this is kept securely and take appropriate action to prevent unauthorised access.

Paperwork/documentation will be:

- securely transported from the course venue to their premises by an authorised person, or through a secure carrier, such as Royal Mail Special Delivery service.
- Not left unattended
- Securely protected
- Promptly transferred to a secure storage area accessed by authorised person's only
- Securely disposed of should it be electronically scanned

#### **Electronic format**

When data is stored in electronic format, appropriate security measures are taken to protect learner's data.

- Electronic records and documents are stored on a computer/server/cloud system that is protected by suitable security software and that physical computers are in secure locations with access only available to authorised persons.
- Security software is maintained and important security updates are quickly installed.

- Appropriate measures must be in place to cover staff working from home or accessing systems, containing learner data, from remote locations.
- All systems must be protected and only accessed through a secure log in system with users having unique username and passwords.

### **Loss of data**

- Trainer/Assessors must take all possible actions to prevent the accidental or deliberate loss of data.
- Course paperwork/documentation in electronic format must be appropriately backed up either internally or remotely through the internet.
- Course paperwork/documentation in hard copy format must be securely stored and a back up copy generated if being sent through a secure courier.

Vital Life Solutions Ltd's policies are kept under constant review and updated as and when required. Last updated: May 2024