



Privacy Policy

Introduction and purpose of this Privacy Policy

We at Rail Professional Development, are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your personal data when you use or access Assure ICMS, www.rpd.co.uk and www.assure-managementsystems.com

By accessing or using Assure ICMS, www.rpd.co.uk and www.assure-managementsystems.com, you consent to the practices described in this Privacy Policy.

This privacy policy aims to give you information on how Rail Professional Development collects and processes your personal data through your use of these websites, including any data you may provide through this website when you add in any personal data.

These websites are not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Information We Collect

User Account Information: To provide you with access to our Integrated Competence Management System, we may collect personal information such as your name, email address, username, and password.

Learning Data: We may collect data related to your learning progress, including course enrolments, assignments completed, quizzes taken, and grades achieved.

Communication Data: When you contact us or interact with our support team, we may collect information related to those communications, such as email exchanges or chat transcripts.

Technical Information: We may automatically collect technical data, including your IP address, browser type, device type, and operating system.

Marketing and Communications Data

We also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data



with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Cookies

Certain information about the user, such as IP addresses, navigation through site, software used, time spent and other similar information, may be stored on our servers in small data pieces known as “cookies,” which may also be written to a user’s computer system. These cookies will not specifically identify the User. The information will be used internally only for web site traffic analysis. In addition, we also record your IP address, which is the Internet address of your computer, and information such as your browser type and operating system. This information helps us learn about the geographical distribution of our website visitors and the technology they use to access our site. This information is never connected with the personal information you supply to us if you register on our website.

How We Use Your Information

We use the information we collect for various purposes, including:

Providing Services: To create and manage user accounts, enrol you in courses, and facilitate your learning experience as well as data on your progress through assessments.

Communications: To respond to your enquiries, provide customer support, and send you important updates related to our services.

Legal Compliance: To comply with applicable laws and regulations, including responding to legal requests and enforcing our terms and policies.

Data Sharing and Disclosure

We may share your personal information with third parties in the following circumstances:

Service Providers: We may share your data with third-party service providers who help us with tasks such as hosting, data analytics, and customer support.

Legal Obligations: We may disclose your information when required by law or to protect our rights, privacy, safety, or property, or those of others.

Business Transfers: In the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity.



Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **your legal rights below** for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully



exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

GDPR

Rail Professional Development are the 'Controller' responsible for hosting and processing your data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Rail Professional Development info@rpd.co.uk

Your Choices

You have certain rights concerning your personal information:

Access and Correction: Your company can access and update your personal information within account settings for your site.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal reasons. We will notify you of any significant changes through email or by posting a notice on our website.



Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or the use of your personal information, please contact us at 01268 822842 or info@rpd.co.uk.

Thank you for using Assure ICMS, www.rpd.co.uk and www.assure-managementsystems.com for your learning and competence needs. We are committed to providing you with a safe and secure online environment.