

Privacy Policy and Cookie Policy for our Websites

17/05/18



1. Introduction

This is our privacy policy. It tells you how we collect, and process data received from you on our sites (staylegal.net, pyramid-online.net, fmsystem.co.uk, elearningzone.net). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

If you have any comments on this privacy policy, please email them to team@dds.international.

2. Who We Are

Here are the details that the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, known as General Data Protection Regulation (**GDPR**) says we have to give you as a 'data controller':

- Our site addresses are staylegal.net, pyramid-online.net, fmsystem.co.uk, and elearningzone.net
- Our company name is DDS International Limited
- Our registered address is Luffield House, Stadium Way, Sittingbourne, Kent, ME10 3SD, England.
- Our Data Protection Officer is Chris Blandford-Thompson and he can be contacted at team@dds.international.

3. What we may collect

We may collect and process the following data about you:

- Information you put into forms or surveys on our sites at any time
- A record of any correspondence between us
- Details of transactions you carry out through our site
- Details of your visits to our site and the resources you use
- Information about your computer (e.g. your IP address, browser, operating system, etc.) for system administration.

Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

- a) you have given consent to the processing of your personal data for one or more specific purposes;

- b) processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which we are subject, for example, accident reporting;
- d) processing is necessary to protect the vital interests of you or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- f) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our credit card payment processing, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

4. Cookies

All Cookies used by and on our website are used in accordance with current English and EU Cookie Law.

The site uses cookies or similar technology to collect information about your access to the site. Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you.

A few of the cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the site and will last for longer.

All cookies used on our site are set by us.

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can prevent the setting of cookies by adjusting the settings on your browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the sites.

Our cookies will be used for:

Essential session management

- creating a specific log-in session for a user of the site in order that the site remembers that a user is logged in and that their page requests are delivered in an effective, secure and consistent manner;
- recognising when a user of the site has visited before allowing us to identify the number of unique users we receive to the site and make sure we have enough capacity for the number of users that we get;
- recognising if a visitor to the site is registered with us in any way;
- we may also log information from your computer including the existence of cookies, your IP address and information about your browser program in order to allow us to diagnose problems, administer and track your usage of our site.

Functionality

- customising elements of the content of the pages of the site.

Performance and measurement

- collecting statistical information about how our users use the site so that we can improve the site and learn which parts are most popular to users.

5. How we use what we collect

We use information about you to:

- Present site content effectively to you.
- Carry out our contracts with you.
- Allow you to use our interactive services if you want to.
- Tell you our charges.

In addition, if you don't want us to use your personal data for any of the other reasons set out in this section in 5, you can let us know at any time by contacting us at team@dds.international, and we will delete your data from our systems. However, you acknowledge this will limit our ability to provide the best possible products and services to you.

In some cases, the collection of personal data may be a statutory or contractual requirement, and we will be limited in the products and services we can provide you if you don't provide your personal data in these cases.

6. Where we store your data

We may transfer your collected data to storage outside the European Economic Area (EEA). It may be processed outside the EEA to fulfil your order and deal with payment.

By giving us your personal data, you agree to this arrangement. We will do what we reasonably can to keep your data secure.

Payment will be encrypted. If we give you a password, you must keep it confidential. Please don't share it. Although we try to provide protection, we cannot guarantee complete security for your data, and you take the risk that any sending of that data turns out to be not secure despite our efforts.

We only keep your personal data for as long as we need to in order to use it as described above in section 5, and/or for as long as we have your permission to keep it. In any event, we will conduct an [annual] review to ascertain whether we need to keep your personal data. Your personal data will be deleted if we no longer need it.

7. Disclosing your information

We are allowed to disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer.
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights.
- We can exchange information with others to protect against fraud or credit risks.

We may contract with third parties to supply services to you on our behalf. These may include payment processing, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. These are the third parties that have access to your information:

- Google
- Eazipay (direct debit processing)
- Paypal
- The Health & Safety Executive
- Local Authority Enforcement Agencies
- Highfield Awarding Body
- Insurers

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

8. Your rights

We do not and will not use your data for marketing.

Under the GDPR, you have the right to:

- request access to, deletion of or correction of, your personal data held by us at no cost to you;
- request that your personal data be transferred to another person (data portability);
- be informed of what data processing is taking place;
- restrict processing;
- to object to processing of your personal data; and
- complain to a supervisory authority.

To enforce any of the foregoing rights or if you have any other questions about our site or this Privacy Policy, please contact us at team@dds.international.

9. Links to other sites

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our site. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

10. Changes

If we change our Privacy Policy, we will post the changes on this page. If we decide to, we may also email you.

11. Dispute Resolution

11.1 Introduction

The purpose of this procedure is to set out our complaints procedure for all customers, which is set out in line with our quality management system ISO9001:2008.

DDS promise is to deliver customer excellence, and so we aim to exceed the expectations at all times.

Therefore, it is important should you feel you have encountered a level of service that is below expectations that you raise concerns you may have with us as soon as possible.

11.2 Scope

This procedure covers complaints that our customers may make in relation to the products and services provided by DDS.

It is not to be used to cover appeals in relation to decisions made by any of the qualification awarding bodies used by DDS for courses delivered. These areas are covered by the DDS appeals procedure. Should a complaint be submitted which is in fact an enquiry or an appeal we will respond to inform the relevant party that the issue is being considered, where appropriate, in accordance our appeals procedure.

If you are unhappy about the way an examination or assessment was delivered and conducted and you suspect malpractice or maladministration may have occurred, you should send your concern to DDS in accordance with the arrangements in the maladministration and malpractice policy.

11.3 Complaints Procedure

All DDS employees have been trained to help and support any customer enquiry and therefore in the first instance please contact your main DDS contact, or our operations team try to sort out any problem at the earliest opportunity.

If you are not satisfied with the response, or feel that they have been unhelpful, or you wish to speak to someone else, you can ask to speak to the Operations Director or Director of Business Development.

If you are not satisfied with the help provided by either of our directors then please send an email detailing your complaint, normally within one month of the event you are complaining about and address it to the Managing Director at the contact details outlined at the end of this procedure.

When you contact us, please give us your full name, contact details including a daytime telephone number along with as much information as possible including:

- ✓ a full description of your complaint (including the subject matter and dates and times if known);
- ✓ any names of the people you have dealt with so far;
- ✓ copies of any correspondence relevant to the complaint.

Sometimes a complainant will wish to remain anonymous. However, it is always preferable to reveal your identity and contact details to us. If you are concerned about possible adverse consequences, please inform us that you do not wish for us to divulge your identity. If it helps to reassure you on this point, we can confirm that we are not obliged to disclose information if to do so would be a breach of confidentiality and/or any other legal duty.

While we are prepared to investigate issues, which are reported to us anonymously and/or by whistleblowers we shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those the complaint/allegation relates.

What will happen to my complaint?

✓ We will acknowledge receipt of your complaint within 2 working days.

✓ We aim to investigate the complaint within 10 working days. If your complaint is more complex or involves people who are not available at the time, we may extend this time. We may contact you within this period to seek further information or clarification (in some instances we may recommend a meeting).

✓ At the end of the investigation we shall write/email to inform you of our decision.

DDS may not be able to consider a complaint that has not been made within a reasonable timeframe of the event that is being complained about, to be determined at DDS absolute discretion.

Whilst we would like to think that we have taken every reasonable step along the way to properly and impartially investigate your complaint, the decision of our Managing Director is final.

If you are still unhappy with the outcome of a complaint specifically regarding an accredited course, then you may still, if you wish, contact the awarding body; details of which will be provided on request.

Contact Details for All Complaints

1. Initial complaint/query

Please contact your DDS main point of contact

You main DDS contact or

The DDS operations team on teamdds@dds.international Tel: 01795 471142

2. If you are still not satisfied with the response or wish to speak to a director

Please contact either of the following directors:

chris.blandford-thompson@dds.international or paul.smith@dds.international
Tel: 01795 471142

3. If you are not satisfied with the director's response

Please formally detail your complaint in writing to the Managing Director:

sue.smith@dds.international

11.4 Appeals Procedure

This procedure is designed for a complainant who is not happy with the outcome of a decision made by DDS in relation to a Highfield approved qualification or unit. The document sets out the process you should follow when submitting appeals to DDS and the process we will follow when responding to enquiries and appeals.

Process for Raising an Appeal

In the first instance learners have a maximum of 5 working days from the date we notified you of the decision you are appealing against in which to lodge an appeal - this includes assessment results; hence please advise your learners/staff to retain any assessment documentation until they receive their results.

When submitting an appeal please provide in writing relevant supporting information such as the following where relevant:

- learner's full name and Highfield registration number;
- learner's date of birth;
- Centre name/number;
- Name of nominated tutor/assessor;
- date(s) your centre or the learner received notification of Highfields's decision;
- title of the HABC qualification taken or nature of service affected (if appropriate);
- full grounds of the appeal;

Initial Review of the Appeal Details

Upon receipt of any appeal a DDS director will usually acknowledge receipt of the appeal within 1 working day.

The initial stage will be for DDS to undertake an informal assessment to ascertain if the issue can be resolved before it goes to a formal appeal. In all instances, DDS will ensure that the person carrying out this initial check will not have a personal interest in the decision being appealed.

DDS will aim to respond formally after the review of the potential appeal within 20 working days. Please note that in some cases the review processes may take longer, for example, if a site visit is required. In such instances,

DDS will contact all parties concerned to inform them of the likely revised timescale.

DDS may reject the appeal application if there is insufficient detail and/or evidence to take forward or the learner has not provided any additional evidence/detail that was requested during an internal investigation.

Following the initial review of the appeal DDS will write to the appellant with details of the decision to either:

- amend the original decision in light of the new rationale/evidence being put forward; or
- confirm DDS stand by the original decision, in doing so the rationale for this decision and request that you confirm, within ten working days, whether you now accept this decision or if you wish to proceed to an appeal to the awarding body i.e. HABC.

Further Appeal to the Awarding Body

If you are not satisfied with the appeal outcome you may appeal to the awarding body directly. Details of this process will be provided by DDS when confirming the initial appeal outcome.