



## Hub-4 Ltd. Privacy Policy

The privacy of your data is very important to us.  
Your data needs to be and is safe with us.

Let us explain our Policy:

### **Who is collecting the data?**

We are Hub-4 Limited registered in England at Moorgate House, King St, Newton Abbot TQ12 2LG

We are registered **ZA204812** under GDPR with the Information Commissioners Office to process data.

We are the data processors.  
Our clients are the data controllers.

### **What data is being collected?**

To enable you to complete our online courses we collect your email address, first name and last name.

We might also collect your location, department, telephone number or other data provided by you or your employer, if the course you are completing is through them.

If you provide additional information to us whilst completing the course, that is also collected.

All data collected can only be accessed by authorised people for the appropriate purposes for which they have access.

### **What is the legal basis for processing the data?**

**Contract** - The processing is necessary for us to meet contractual obligations with your employer or yourself



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### **Will the data be shared with any third parties?**

No. Except under legal circumstances when required by Law

### **How will the information be used?**

The data will only be used for the intention it was collected for. This is to enable you to login and complete one or more of our online courses

### **Data retention: How long will the data be stored for?**

We retain data in accordance with the GDPR whereby data is held for no longer than is necessary.

Data that has a legal implication is kept for eight years unless otherwise instructed by you or your employer.

### **What rights does the data subject have?**

Under GDPR legislation you have the following:

#### **the right to be informed.**

You have the right to be informed about the collection and use of your personal data. Under the GDPR, we must give data subjects **specific privacy information** about:

- your business
- the data processing activities you carry out
- the length of time you will keep the data
- the rights available to them in respect of processing
- the right to lodge a complaint



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See the full list of privacy information you should give individuals.

### **the right of access.**

Under the GDPR, data subjects have the right of access to personal data. If they ask you, you must give data subjects:

- confirmation of whether you are processing their data
- other supplementary information (including mandatory privacy information)
- a copy of the personal data being processed

We must comply with a subject access request within one month of receipt, unless in specific circumstances.

### **the right to rectification.**

Data subjects can ask data controllers to erase or rectify inaccurate or incomplete data. The law gives us one month to comply with such requests. Find out more about the right to rectification.

the right to erasure.

### **the right to restrict processing.**

You can ask us to restrict processing their personal data if, for example:

- you believe your data is not accurate (we will stop processing until you verify the accuracy of the data)
- the processing is unlawful but the you don't want the data erased
- we no longer need the data but you need it to exercise a legal claim
- we are taking steps to verify overriding grounds in the context of an erasure request



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If someone asks us to restrict processing, we are allowed to store the data, but won't be able to carry out any processing. Find out more about the [right to restrict processing](#).

### **the right to data portability.**

You have the right to ask for your personal data from us so you can use elsewhere

### **the right to object to processing.**

Your objection has to be justified and can be made verbally or in writing. We may have to cease processing unless we can demonstrate that:

- we have compelling legitimate grounds for processing which override your interests, rights and freedoms
- the processing is necessary in connection with legal rights

### **the rights in relation to automated decision making and profiling.**

Under the GDPR, individuals have the right not to be subject to a decision that is based solely on automated processing and which significantly affects them (eg profiling for jobs, insurance premiums etc).

We consider asking data subjects to consent if we need to process their data automatically for evaluation purposes.

Read more about [rights related to profiling and automated decision-making](#).



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## How can the data subject raise a complaint?

You can register a complaint about our handling of your personal data with the ICO, who are the UK's supervisory authority for GDPR. [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## Breaches

Any breaches will be reported to our I.T. Department for immediate action to prevent future breaches.

Breaches will be reported to the customer

Breaches will be reported to The ICO

## Changes to Privacy Policy

We reserve the right to update by amending our Privacy Policy at any time

## Any questions?

Please address any questions to Hub-4 by email to [gdpr@hub-4.co.uk](mailto:gdpr@hub-4.co.uk) or by writing to: Hub-4 Ltd, Moorgate House, King St, Newton Abbot TQ12 2LG

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