

# ASDAN platform privacy policy

## Introduction

Welcome to ASDAN's ("we", "us", "our") platform privacy policy.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information about who we are and how and why we collect, store, use and share your personal data when you access our platform as a representative of an Educator, or as a Learner. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

## Controller

ASDAN is the data controller and is responsible for certain personal data about you that we collect and use to supply you with our services via our platform as a representative of an Educator or in certain situations as a Learner.

If you have any questions about this policy or about how we handle your data, please contact our data privacy team/manager as follows:

Email: [info@asdan.org.uk](mailto:info@asdan.org.uk)

## Learner information

We understand that in some cases Learners under the age of 18 may access our resources. Parents and guardians also have an important role in helping their child understand their data rights. We take our responsibilities very seriously and are a responsible handler of the personal data of children and young people under 18.

## Processor

We may also act as **processor** of some Learner personal data that we receive from or collect on behalf of one of our Educators, acting as a controller. This is so that we can provide our services and our legal obligations as a processor are instead set out in the contract between us and the relevant controller/Educator and the relevant privacy obligations applied.

## Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We keep our privacy policy under regular review. This version was last updated in **October 2025**.

## 1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

### Learners

- **Identity data:** includes name, gender, date of birth, ethnicity, disability, ULN.
- **Contact data:** includes email address.
- **Educational data:** includes your affiliated Educator/school, assessment results and exam data, course attendance/progress.
- **Technical data:** includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.
- **Usage data:** information about how you use our platform, IT, communication and other systems

### Representatives and staff of Educators

- **Identity data:** includes name, title, job title and Educator affiliation.
- **Contact data:** includes business address, email address and telephone numbers.
- **Profile data:** includes feedback, your contact history, your login information.
- **Usage data** includes information about how you use our platform.
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences
- **Technical data:** includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.
- **Usage data:** information about how you use our platform, IT, communication and other systems

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 platform 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.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have purchased from us but we will notify you if this is the case at the time.

## **2. How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by phone, email, [via our website](#) or otherwise. This includes personal data you provide when you:

- apply for our services;
- create an account on our platform;
- subscribe to our publications;
- request marketing to be sent to you; or
- give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our platform, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.

**Third parties.** We will receive personal data about you from various third parties such as:

- analytics providers such as Google;
- in the case of representatives of Educators, we may receive personal data from your organisation directly (the Educator);
- in the case of Learners we may receive personal data from the relevant Educator.

## **3. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where the processing is necessary for the performance of a task carried out in the public interest (awarding qualifications).
- Where we need to comply with a legal obligation.
- In limited circumstances where you have given your consent.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a representative of an Educator or a Learner	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to manage our contract with your organisation)
To process and deliver your organisation (Educator) request for our Services: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Managing our relationship with your organisation	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Consent
Managing and verifying assessment entries and submissions of Learners,	(a) Identity (b) Contact (c) Educational	Necessary for the performance of a task carried out in the public interest (awarding qualifications).
Conducting moderation, standardisation, and awarding of results, issuing certificates and verifying qualifications	(a) Identity (b) Contact (c) Educational	Necessary for the performance of a task carried out in the public interest (awarding qualifications).

Maintaining records for regulatory and quality assurance purposes	(a) Identity (b) Contact (c) Educational	Necessary for the performance of a task carried out in the public interest (awarding qualifications).
To administer and protect our business and this platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To use data analytics to improve our platform, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our platform updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our services and grow our business)  (b) Consent

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will only send direct marketing to representatives of Educators, not directly to Learners or parents of Learners.

## Opting out

You can ask us to stop sending you marketing messages at any time by unsubscribing.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service/ purchase, service experience or other transactions.

## Cookies

You can set your browser to refuse all or some browser cookies. If you disable or refuse cookies, please note that some parts of this platform may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY].]

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us: [info@asdan.org.uk](mailto:info@asdan.org.uk)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 4. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Third party service providers who help us deliver our services such as IT and system administration services, Cloud service providers.
- Educators with whom we have a contract may receive information about certifications and qualifications awarded to Learners.
- Regulatory bodies such as Ofqual for compliance and quality assurance
- Marketing companies and online advertising agencies, helping us to manage our electronic communications to the Educators.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **5. International transfers**

It is sometimes necessary for us to transfer your personal data to countries outside the UK. In those cases we will comply with applicable UK laws designed to ensure the privacy of your personal data.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us: [info@asdan.org.uk](mailto:info@asdan.org.uk) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **6. Data 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.

## **7. Data retention**

### **How long will you use my personal data for?**

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.

Details of retention periods for different aspects of your personal data are available from us by contacting us: [info@asdan.org.uk](mailto:info@asdan.org.uk)

## **8. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below (Your Legal Rights) to find out more about these rights.

If you wish to exercise any of these rights please contact us: [info@asdan.org.uk](mailto:info@asdan.org.uk)

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **YOUR LEGAL RIGHTS**

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.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

**Last updated: October 2025**