



ProofPositive and GDPR Compliance

The **General Data Protection Regulation (GDPR)** comes into force on the 25th May 2018. This legislation introduces more stringent rules for the processing of personal data which strengthen privacy rights.

Keeping your data safe and increasing transparency are important to MediaCorp Online (the owners of ProofPositive), and we're committed to these changes. Accordingly, we are now putting policies and measures in place to achieve GDPR compliance with regard to the ProofPositive system. These are laid out below.

Data Privacy, Profiling and Data Minimisation

MediaCorp Online will never pass any of your training centre data, including any candidate data, to any 3rd-party for any purpose, other than those required by law, at any time.

MediaCorp do not perform any user profiling on the ProofPositive system. The processing performed by the system is strictly limited to that which is required for the candidate to work towards certification, and for you to manage that process.

Data Retention

We will be introducing a data retention policy whereby all data relating to a candidate's portfolio will be automatically erased **12 months after the IV marks the portfolio as complete**. You will have the ability to extend or shorten this retention period in line with your own retention requirements. You will also be able to flag any portfolio as being 'Under Appeal'. Such portfolios will never be fully erased until you remove the 'Under Appeal' flag.

Please note that it is your responsibility as a training provider to ensure that IVs mark portfolios as complete when they are satisfied that this is the case. This will ensure that no personal data is being held longer than is required - one of the GDPR prescriptions.

The right to be forgotten

We will be introducing a new feature, whereby you will be able to completely erase all of a candidate's data at any point. This will be necessary if your candidate withdraws from their contract with you and decides not to complete their portfolio before the IV has marked the portfolio as complete.

Subject Access Rights

Under GDPR, candidates have the right to access any of their personal data which is being held and processed. Candidates already have the ability to access this information in ProofPositive, so there will be no change to ProofPositive in this regard.

Data Portability

In time, we will be introducing an Export feature which will enable candidates to download a copy of their portfolio. This will have to be done in line with the data retention window you set in ProofPositive - in other words, candidates will not be able to export their portfolio if all its data has been fully erased.

Basis for Processing

The advice from our experts is that your basis for processing candidate data is contractual in nature - in other words, the candidates enter into a contract with you as their training provider to work towards certification.

This means that the ProofPositive system does not need to obtain the candidates' consent to have their personal data processed, so there will be no change to ProofPositive in this regard.

Data Accuracy

Candidates are currently able to edit their own personal details - e.g. First Name, Second Name and Email Address. This will continue to be the case, ensuring the candidates' right to accuracy of their data.

Data Breach Procedure

In the event of a data breach or suspected data breach, Mediacorp will investigate the incident in line with our Personal Data Breach Management Procedure.

If a breach is confirmed, we will, in short:

- immediately take any action required to limit and/or contain the breach
- notify all relevant parties within the time periods specified by GDPR
- take any necessary remedial action to prevent a repeat of the breach

If you suspect a data breach, please contact MediaCorp Online immediately, on 01698 338652.

Data Protection and Security

The ProofPositive site is now protected by an SSL certificate. This means that all data passed to and from the system is encrypted, so that it cannot be intercepted by any unauthorised party.

Role-based access prevents users who are logged in from accessing any user account information, portfolio, assessment or IV data which they are not authorised to see.

MediaCorp are constantly striving to keep your data safe and secure, and are continually revising and upgrading our practices and technology to maximise that safety and security.



If you have any concerns about ProofPositive and GDPR which we haven't addressed in this document, please don't hesitate to get in touch.

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