

Statement of Data Protection/GDPR Policy

COMPLETE EDUCATION SOLUTIONS LTD will use personal data legally and securely regardless of the method by which it is collected, recorded and used and whether we hold it within our products, on a group network or device, in filing systems, on paper, or recorded on other material such as audio or visual media.

COMPLETE EDUCATION SOLUTIONS LTD regards the proper and good management of personal data as crucial to the success of us business. Observing good data protection practice plays a huge role in maintaining customer confidence. We ensure that COMPLETE EDUCATION SOLUTIONS LTD respects privacy and treats personal data lawfully and correctly.

We will ensure that:

- there is someone acting in the statutory role of Data Protection Officer on behalf of the COMPLETE EDUCATION SOLUTIONS LTD group of companies. This person is COMPLETE EDUCATION SOLUTIONS LTD Software Group Ltd.'s Data Protection Officer;
- responsibility for each system or product's data protection compliance is assigned to one or more individuals;
- our collection and use of personal data comply with the data protection principles, data subject rights, relevant codes of practice, wherever we are acting as a controller;
- we provide appropriate privacy notices and explanations through whatever means we collect personal data, such as on application forms, products, webpages and via telephone wherever we are acting as controller;
- appropriate technical and organizational measures for all our products and IT systems are implemented to ensure a level of security appropriate to the risks;
- everyone managing and handling personal data understands that they are contractually responsible for following the good Data Protection practice set out in this policy and the supporting guidance and standards;
- everyone managing and handling personal data is appropriately trained, supervised and audited;
- our privacy notices make clear to anyone that wants to make enquiries about our personal data processing, can do so through the Data Protection Officer or the products designated data protection representative;

- our handling and processing of personal information are regularly risk-assessed and evaluated;
- a corporate procedure is in place to report and investigate personal data breaches without delay;
- we keep the statutory records required under GDPR as well as any further records required to demonstrate compliance, such as risk assessments, policies, working procedures, records of consent and so on.

In addition, where COMPLETE EDUCATION SOLUTIONS LTD is acting in the capacity of data processor we will:

- provide our customers with appropriate guarantees in respect of the technical and organizational measures we have in place to protect personal data and to and to protect the rights of data subjects;
- process the personal data only on documented instructions from the customer, including transfers to a third country or an international organization;
- ensure that persons authorised to process the personal data entrusted to us are under an appropriate statutory obligation of confidentiality;
- assist the customer, as far as is possible, by appropriate technical and organizational measures, to fulfil the customers' obligation to respond to data subjects exercising their rights as set out in the data protection legislation;
- at the choice of the customer, delete or return all the personal data at the end of the processing contract, and delete copies, unless the law requires us to store personal data for longer;
- make available all information necessary to demonstrate compliance with our data protection obligations and allow for and contribute to audits, including inspections conducted by the customer's auditor;
- not engage another processor except as authorised by the customer under the processing agreement;
- notify the customer of any intended changes concerning the addition or replacement of other processors, to give the customer the opportunity to object to such changes;
- ensure that any other processors we engage to process the customers data adhere to the same standards imposed on COMPLETE EDUCATION SOLUTIONS LTD in respect of data protection and security;