

PeopleCert Privacy Policy

This Policy describes how companies in the PeopleCert group with offices including in London, UK (at 121/122 Sloane Street, SW1X 9BW), Nicosia, Cyprus (at 40 Themistokli Dervi Street, 1066) and Athens, Greece (at 3 Korai Street, 10564) (together "PeopleCert" or "we") collect and process data which identify individuals ("Personal Data") who are customers and other users of our services ("Users", "you"), and your associated rights. This Policy applies to PeopleCert products and services, including websites operated by PeopleCert. Your privacy is extremely important to us and we are committed to offering you a safe and hassle-free experience while visiting our websites and using our services.

1. How We Collect and Use Personal Data

We may collect and/or process your Personal Data only as stated in this Policy, for the purposes described below. We process Personal Data as necessary for our legitimate interests in providing certification and related services, to fulfil our contracts with you, and in certain cases based upon your explicit consent.

a. Certification Services

PeopleCert provides examination and certification services ("Certification Services") as a Personnel Certification Body and Accredited Examination Institute. We may collect your Personal Data (including name, address, email address, phone number, date of birth, photo ID, video and audio recordings of examination sessions, and other information) to confirm your identity, deliver examinations, and ensure the validity of the certification process. Certain Personal Data is required to be collected under our procedures to provide you Certification Services and other Personal Data is collected to provide you with a good experience.

PeopleCert uses your Personal Data to provide Certification Services. We may also use your Personal Data for internal research and development or quality control purposes, and extracts from examination work in anonymised form may be reproduced in published exam preparation material. In the process of providing Certification Services, we create additional Personal Data, including examination results. Recordings of examination sessions are retained for one (1) year to provide a record of examination integrity.

Some of our Certification Services are offered in cooperation with (i) organisations (including public authorities) that provide examination content or otherwise authorise examinations ("Test Owners") and/or (ii) organisations who are authorised and approved by PeopleCert for delivery of Certification Services ("Partners"). Some authorised Partners may also provide training services related to PeopleCert certifications. We may share your Personal Data with those Test Owners, and Partners to the extent necessary to provide you Certification Services. We require Test Owners and Partners to comply with data protection law, but we are not directly responsible for their privacy practices. For information on those practices, please refer to the privacy policies of the Test Owner associated with your examination (our websites contain information about Test Owners) and Partner(s) whose services you use.

PeopleCert maintains a registry containing details of all certified persons. As a Personnel Certification Body and Accredited Examination Institute we operate publicly available Certificate Verification Service ("CVS") accessible via our websites www.peoplecert.org, www.languagecert.org and www.languagecert.gr. The CVS allows Users and third parties (e.g. employers) to confirm the authenticity and accuracy of any PeopleCert certificate by entering the serial number of the relevant certificate.

b. Certification Services – Support

PeopleCert delivers Certification Services in cooperation with an extensive network of Partners and other supporting organisations and individuals, including trainers; examination invigilators, interlocutors, supervisors, markers and assessors; Advanced Test Center Managers (ATCMs); auditors; and others. We collect Personal Data of individuals providing such supporting services ("Certification Personnel") in order to ensure examination quality and security, including name, address, email address, phone number, date of birth, gender, employment information (e.g. PeopleCert role and experience), nationality, native language, photo ID, video and audio recordings of examination

sessions, and other information. When recruiting new Certification Personnel, we collect this information in part via the Workable online recruitment platform. Records are retained for five (5) years from the end of our relationship with Certification Personnel (or an unsuccessful application of Certification Personnel).

We use Personal Data of Certification Personnel to provide Certification Services and to manage our relationships with Certification Personnel and the entities that employ them. We may disclose Personal Data of Certification Personnel to Test Owners whose examinations the Certification Personnel are involved in delivering.

c. Online Proctoring

PeopleCert optionally offers examinations through the PeopleCert Online Proctoring (OLP) services, for Users who wish to take an online exam at their preferred time and location (i.e. almost anywhere they have internet access). PeopleCert Online Proctoring connects Users via webcam directly to an authorised PeopleCert proctor (invigilator), who guides them throughout the exam and monitors the exam session.

The OLP service includes the following photographic records of examination sessions and examination candidates ("Candidates"):

- We record the exam session (video, sound and User's computer desktop), ensuring its security and integrity. Recordings are retained for one (1) year to provide a record of examination integrity.
- For certain OLP examinations, we may with notice to the Candidate also take a photograph of the Candidate for ongoing identification purposes and inclusion in the examination statement of results (which may be shared with third parties as explained in paragraph 3 below). The photographs are retained according to our retention policy as part of the PeopleCert's records of the examination results.

d. Online Account

All PeopleCert examination Candidates (and in certain circumstances other Users) must have an online account ("PeopleCert Account"), which is created and accessible via the PeopleCert website. Users also may voluntarily create an Account. Your Account contains some or all of the Personal Data that we hold about you, and makes it easier for you to use our services. You may request deletion of your Account at any time by emailing dataprotection@peoplecert.org although this may reduce our ability to provide you services. We may be required to retain certain Personal Data after account deletion to ensure the functioning of Certification Services.

e. Customer Support Services

PeopleCert offers 24/7 customer support to Users (both organisations and individual Candidates), through email, telephone and online chat. Telephone calls and online chats may be recorded for monitoring and training purposes, and to improve our services. Telephone recordings are retained for up to fifteen (15) days, and online chat recordings and emails are retained for up to one (1) year.

f. Marketing Communications

If you have opted in to receiving marketing communications from PeopleCert, we may occasionally contact you via various means (e.g. email, SMS, telephone) to inform you of new PeopleCert products and services, and other PeopleCert developments. Partners and Test Owners are not permitted to use your Personal Data for marketing or similar purposes, unless specific consent has been given by you. You have the option of opting out of such communications at any time, by using the "unsubscribe" links in the communications or by contacting us at dataprotection@peoplecert.org.

g. Surveys

From time to time PeopleCert may run surveys, polls and similar initiatives ("Surveys"), to request information from Users to assist us to improve our products, services and operating practices. Participation in Surveys is always voluntary, and Personal Data provided in Survey responses will always remain strictly confidential. The results of Surveys may be aggregated and anonymised, and such anonymised information may be shared with third parties.

k. Cookies, Analytics and Customised Advertising

PeopleCert uses cookies on its websites to optimise user experience, enhance security and combat fraudulent and/or malicious web activity. These cookies contain information about your login status. You can adjust your browser settings to refuse or limit cookies. However, if you do not accept cookies, you may not be able to use parts of our websites.

We also use Google Analytics to improve the content and functions of our websites and online proctoring services (by collecting information about how visitors use these services), and the Google AdWords service to provide you with customised advertisements that suit your interests and preferences. Google anonymously collects information such as age, gender, geographical location, webpage views and visits to other websites, including using cookies. You can manage cookie preferences through your Google account, by going to Google Account Settings and editing your preferences. To opt out of being tracked by Google Analytics, you can install the relevant browser add-on available at <https://tools.google.com/dlpage/qaoptout>.

2. Services to Children

Where the User of our services is a child below the age of 16 years, we will request consent for the collection and processing of Personal Data from a holder of parental responsibility over the child.

3. Disclosure of Personal Data to Third Parties

We never sell your Personal Data or disclose it to third parties for marketing purposes (if Test Owners whose examinations you take market other services to you, it is their responsibility to comply with applicable data protection law – see paragraph 9 below).

We may disclose Personal Data to third parties in the following circumstances:

- if we have obtained your consent to do so
- as part of the Certification Services, including:
 - sharing with Test Owners as described in paragraphs 1.a and 1.b
 - during examination sessions, through contact among Certification Personnel and candidates
- by disclosing your examination results:
 - as part of the CVS described in paragraph 1.a
 - to the Partner where you took your examination, for sharing with you
 - as requested by your employer or other person or entity who booked an examination on your behalf (directly or via a Partner)
- to providers who support PeopleCert's services, with appropriate agreements to ensure the Personal Data is used only for these supporting services and in accordance with this Privacy Policy
- when we are required by law or court order, or requested by a regulatory or governmental authority legally authorised to request such disclosure
- if you are suspected and/or investigated for examination malpractice
- if required to protect the rights, property or safety of PeopleCert, its business partners or Test Owners.

4. Retention of Personal Data

Where retention of Personal Data is required by law, PeopleCert complies with required retention periods. In other circumstances, PeopleCert retains Personal Data for as long as necessary for the business purposes set out above. For certain specific circumstances, shorter retention periods are specified in this Policy.

5. Cross-Border Transfer

We aim to comply with the data protection law in all countries where we do business, including the laws of the European Union. We transfer Personal Data across borders in accordance with applicable law. When we transfer or store Personal Data of EU residents outside the European Economic Area,

we do so in compliance with the applicable EU laws on data protection (including by working with US partners who comply with the EU-US Privacy Shield).

6. Rights Regarding Your Personal Data

You have the right to access, correct or delete your Personal Data. However, you acknowledge and accept that upon deletion of specific Personal Data, certificate validation and other services provided by PeopleCert may not be available. Under EU law, you have certain rights to restrict or processing of your Personal Data, to withdraw consent to processing that is based upon consent, and of portability of your Personal Data to other service providers. To exercise these rights, please email dataprotection@peoplecert.org.

7. Data Security and Integrity

We use appropriate technical and organisational measures to protect Personal Data from unauthorised use, access, disclosure, alteration or destruction. These precautions include physical, electronic and managerial procedures in compliance with the ISO 27001 international information security and Cyber Essentials standards.

8. Online Purchases

PeopleCert offers products, exams and services for purchase remotely and electronically. Payments are processed securely by our selected payment processors. PeopleCert does not store any credit or debit card information. This information is securely provided by Users directly to our payment processors at the time of purchase. To ensure the safety of electronic purchases, PeopleCert complies with PCI-DSS (Payment Card Industry – Data Security Standard).

9. Third-Party Services and Sites

PeopleCert provides Certification Services in cooperation with Test Owners and Partners (see section 1.a above), and PeopleCert websites contain links to third party websites. PeopleCert is not responsible for the privacy practices or the content of any third-party services and websites. For information on other organisations' privacy practices, you should refer to the privacy policies of those organisations.

10. Amendments to Policy

We may revise this Policy to reflect changes in PeopleCert products or the law, or for other reasons. If we make any material change to this Policy, we will notify you by email. You will be bound by any changes to this Policy when you use PeopleCert services after we have provided notice of such changes.

11. Questions and Complaints

If you have any questions or complaints relating to this Policy, or your Personal Data that PeopleCert holds, please email dataprotection@peoplecert.org. You also have the right to complain to the data protection authorities in your country regarding the processing of your Personal Data, to the extent provided by applicable law (e.g. the EU General Data Protection Regulation or relevant privacy laws of other countries).