



imagitech[®]

Fair Processing & Data Protection Statement

September 2021



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This document outlines Imagitech Limited's (Imagitech) data policy and is to be read in conjunction with Imagitech's Privacy Policy. We hope that by reading it, you will feel comfortable with us temporarily storing some information about you when you use our products, services and systems, and about your driving licence when you use our product Roadmarque®.

Imagitech are the owners of several systems underlying customer facing offerings, including online training systems DTS Anytime and The Official Driving Theory Test, apps intended for training purposes such as "The Complete" range of apps as well as CITB training apps, applications for Windows PCs and Macs, and the driver risk assessment system Roadmarque®. In addition, Imagitech own a secure multi-platform document publishing system intended to give controlled access to reference documents.

Imagitech are registered with the UK Information Commissioner's Office (ICO) under the entry number Z744679X (see also www.ico.org.uk/ESDWebPages/search.asp). The company has been registered with the ICO for a considerable length of time (more than 10 years) and we take the security of user data very seriously, always acting in accordance with the relevant data protection legislation, namely UK GDPR (EU GDPR as amended and incorporated into UK law under the UK European Union (Withdrawal) Act 2018, and applicable secondary legislation made under that Act), EU GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC), and POPIA (Protection of Personal Information Act, 2013 (Act 4 of 2013) in the Republic of South Africa) (hereafter collectively labelled "GDPR").

All personal information that is collected in accordance with our Privacy Policy is dealt with in a professional and confidential manner. We act either as data processors on instructions of data controllers (our customers and partners) or as data controllers.

We strive to reduce the amount of personal data that we request from users to the absolute minimum level required to allow the user to use our products as outlined in our Privacy Policy.

Data collected within Roadmarque®

Imagitech always acts as data processor in relation to Roadmarque®. We collect and use certain types of information about our customers and especially our customer's employees – as directed by our customers. Our customers use Roadmarque® to perform their duties in compliance with duty of care legislation.

The data that we collect and hold within Roadmarque® is composed of three types:

1. Driving Licence Check Fair Processing Declarations or details about e-approval, documenting that you have approved us to carry out electronic licence checks, on behalf of your employer. The fair processing declarations and data associated with e-approval contain the bare minimum of required personal information. This information is received in digital format and occasionally as hard copy.
2. DVLA Records comprising licence information received in response to us providing evidence of approval for an electronic check to be conducted. This information is currently received in digital format and very occasionally on paper.
3. Driver related information – i.e. responses to digital questionnaires or information uploaded by our customers (usually received digitally, and very occasionally, on paper).

Fair Processing Declaration (Roadmarque® only)

We are legally bound to store all fair processing declarations for periodic inspection by DVLA officers. For auditing purposes, the fair processing declarations may be stored for up to 7 years.

Fair processing declarations are stored in digital format (even when provided as hard copy) and any hard copy fair processing declaration forms are destroyed as soon as they are digitised. All fair processing declarations that are no longer required for auditing purposes are deleted.

Licence Information (Roadmarque® only)

The licence check results that we receive from DVLA are received in digital format. Any paper documents containing details of licence checks or licence inspections are destroyed as soon as the information is digitised, in compliance with the safeguards outlined in GDPR.

Once a check has been completed and the data is no longer required, any records are destroyed. We neither request nor receive medical information from the DVLA.

Personal Information

Any personal data that Imagitech receives is stored directly to one of our databases. It is transmitted in an encrypted format using an SSL certificate with a 2048 bit RSA public key.

The data collected will be stored for the shortest period amongst the following: for as long as it is necessary in relation to carrying out any necessary tasks (e.g. with Roadmarque® this means ongoing assessments), until we need to delete records for legal reasons or on request from the data controller, or until an individual user requests its destruction.

Any data held with Roadmarque® will only be used for the assessment itself or in a completely anonymised form for academic research (i.e. survey response data will be used, but name, driver number and any other identifying information will be discarded).

Every individual user is free to contact Imagitech and request that data pertaining to them as collected through Roadmarque® is not used in any research (even anonymised).

Imagitech regards the lawful and correct treatment of personal information as critical to the successful continuation of its operations and to maintaining customer confidence in its services. We therefore ensure that our organisation treats personal information lawfully and correctly. To this end, we fully endorse and adhere to the following eight principles of data protection:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
4. Personal data shall be accurate and, where necessary, kept up to date
5. Personal data shall not be kept for longer than is necessary for that purpose or those purposes
6. Personal data shall be processed in accordance with the rights of data subjects under the relevant data protection legislation
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

8. Personal data as collected by our online systems The Official Driving Theory Test and Roadmarque® shall not be transferred to a country or territory outside the UK or the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.

Therefore, Imagitech undertakes the following:

1. To fully observe conditions regarding the fair collection and use of information
2. To meet its legal obligations to specify the purposes for which information is used
3. To collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
4. To destroy personal data when it is no longer required for the purpose it was originally provided
5. To ensure the quality of information used
6. To apply strict checks to determine the length of time personal data is held
7. To ensure that the rights of people about whom we hold information can be fully exercised under the relevant data protection legislation (these include: the right to be informed that processing is being undertaken; the right of access to one's personal information; and the right to correct, rectify, block or erase information which is regarded as wrong.)
8. To take appropriate technical and organisational security measures to safeguard personal information
9. To ensure that personal information is not transferred abroad without authority or suitable safeguards
10. To ensure that where personal data is stored digitally on web servers, it is transmitted using HTTPS and protected on the remote server using industry standard encryption technologies
11. To ensure that its web servers are subject to regular security checks to ensure that all data is protected using current best practice, at all times

In summary, when asking you for information we will:

1. Ensure you know why we need it
2. Protect it and make sure nobody has access to it that shouldn't have
3. Make sure we keep it no longer than necessary
4. Only use it for marketing if you have given your explicit agreement for us to do so, and otherwise only use it for the purposes described here

In return, we ask you to:

5. Give us accurate information
6. Tell us as soon as possible of any changes
7. Tell us as soon as possible if you notice mistakes in the information we hold about you as this helps us to keep our information reliable and up-to-date

For queries relating to this Data Protection Statement, please email: info@imagitech.co.uk.

For queries relating specifically to Roadmarque, please email: admin@roadmarque.com.

Alternatively, you can write to us at: Imagitech Ltd. Ethos, King's Road, Swansea SA1 8AS, UK