Instinct Training LLP
GDPR Compliance Document

Instinct Training provides a system enabling the delivery of online training products, some generic and some bespoke, to groups of students registered to an individual company. This system also tracks the progress of each student through each training course and records this progress in terms of modules completed and the results of a self test if one exists (which it does for most Instinct titles).

In order to make use of this system a student is provided with a URL supplied by Instinct Training and an ID and Password supplied by a GE or Contractor Supervisor.

The registration process requires the supervisor to enter as a minimum the student's first name, last name. a user ID and a password. Additional optional data which they may also provide at this point include an email address, work department, job title, and ID of their supervisor.

At this stage a unique System ID is generated which is used to identify all the data belonging to that student in the various tables of data. This System ID is used to easily find all the data belonging to an individual student if that student's data is required to be deleted.

On selecting a training course, a student record is created containing the identity information (System ID and Student ID) plus the time, date and course code. As the student progresses through the course this student record is continuously updated. Test results together with a total score and a pass/fail indicator are added to this record when the test is completed.

Details of courses completed are sent by email to the site administrator/s if required.

Registered students whose status on the system is set to either 'manager' or 'supervisor' will have access to all the above data relating to students registered to that account except for student passwords which will be hidden.

Different training accounts which all belong to the same company can be grouped together using a 'supermanager' code. In this case, registered students whose status is set to 'supermanager' can access the student details within all the accounts so grouped (apart from passwords).

The data described above is stored in a secure data centre controlled and administered by Positive Internet.

In addition a Google database has been created containing the name and email address of account administrators. This is used solely by Instinct Training for the purpose of sending occasional newsletters by email which inform customers about new and updated courses. When emailing a newsletter customers email addresses are always blind copied within the email.

Instinct Training does not share any of the data described above with any other company (apart from SGS, Positive Internet who host the server, and Google who host account administrators email addresses).

Instinct Training does not use cookies except session cookies which are essential for the operation of the website.

Instinct Training takes the privacy and security of a student's personal details very seriously.

If a students forgets their password there are 2 options:
(1) If the student has an email address stored then selecting a 'Forgotten Password' option resets the password to the company default and sends an email explaining this. On logging in using this default password the student is then forced to change it.
(2) If the student does not have an email address he must request his manager/supervisor to reset the password and inform the student of the temporary password.

Students who forget their personal ID are encouraged to consult their manager/supervisor, who will personally know their students and be best placed to detect any attempt at fraud. If they contact Instinct Training in this regard they will be referred to their company manager/supervisor - Instinct Training will not divulge this information by email or by phone.
If the student has an email address stored then selecting a 'Forgotten ID' option sends an email containing the ID.

Passwords must conform to a minimum standard of at least 8 characters with at least one capital letter, one lower case letter and one digit. Passwords are encrypted to AES256 standard.

There are 2 ways in which a student's training record can be 'removed' from the system.
(1) Manager/supervisors and Instinct staff have the facility to make a student 'dormant' - this means that the student's personal details and training record remain available to view but the student is unable to login and use the training - the student's training records are easily re-instated by managers/supervisors.
(2) Manager/supervisors and Instinct staff have the facility to 'delete' a student - this means that the student's personal details and training record are not available to view and the student is unable to login and use the training - the student's training records can be re-instated only by Instinct staff and only at the request of the student's employer in writing, accompanied by the reason for the re-instatement.

Data is retained for 3 years after the cancellation of a contract. Shortly thereafter it will be permanently deleted unless retention obligations apply.
At the request of an authorised and recognised account administrator submitted in writing, data belonging to a specified student or group of students will be permanently deleted.

Instinct Training
17th January 2020