

# Aptem GDPR Compliance Document

February 2019

Aptem is a fully GDPR compliant platform. The system is UK hosted at Microsoft Azure and all data remains in the UK. MWS has ISO 27001:2013 data security certification (<https://www.aptem.co.uk/wp-content/uploads/2018/08/mws-technology-iso-27001.pdf>) and is registered with the Information Commissioners Office under the Data Protection Act 1988 (registration number Z1900970).

Our contracts with our customers sets out our GDPR relationship with them. Our customer is the Data Controller and MWS is the Data Processor.

- A Data Controller determines the purposes and means of processing personal data.
- A Data Processor is responsible for processing personal data on behalf of a controller.

This means that MWS processes data under instruction from our customer (the Data Controller). Our standard processing of data comprises:

## Subject Matter

Provision to the Customer's staff and individuals the Customer works with of vocational training and/or employability services and programme management functionality.

## Nature

All Processing of data is automated. The system stores information input by individuals and this can include biographical and contact information, CVs, job applications, career goals, details of current and prior learning, goals and activities. All activities on the site are logged and can be reported on.

## Purpose

Personal and other Data input by the individual is processed in order to facilitate learning and/or employability.

## Categories of Personal Data

To have an account an individual must input a name and email address. According to the type of programme the person is undertaking either the individual or the Customer may enter further information, such as biographical and contact information, CVs, job applications, career goals, details of current and prior learning, goals and activities.

## Sensitive Personal Data

Sensitive Personal Data may occasionally be entered as part of general user profiling or for safeguarding support.

## Categories of Data Subjects

Data Subjects are Customer staff and individuals being supported by the Customer on various programmes such as for employability or vocational learning.

## Recipients of the Personal Data

Outside of court orders or similar UK government regulatory requirement, the only third party able to access the Personal Data is the Customer or those authorised by the Customer.

**Data Transfers**

All Data is stored in the UK and there are no data transfers to other countries.

**Retention**

Upon expiration of Customer agreements Data is archived for six years and then deleted.

**Further Queries**

All data queries should be addressed to:

Data Protection Officer  
MWS Technology Ltd  
3 Harmood Grove  
London  
NW1 8DH

Email: [privacy@mwstechnology.com](mailto:privacy@mwstechnology.com)