

# SCORM Dispatch Privacy Policy

Aptitec Ltd ("we," "us," "our") is committed to protecting and respecting your privacy. This policy outlines how we collect, use, store, and disclose your personal information when you use SCORM Dispatch and your rights in relation to that data. It complies with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

### 1. Who Are "You"?

"You" refers to any person whose personal data we process. Depending on your relationship with SCORM Dispatch, you may fall into one of the following categories:

- **Customer**: An entity, or a person representing an entity, that has an agreement with Aptitec Ltd to provide SCORM Dispatch services.
- **End-User**: A person with a user account in one of our customer's instances of SCORM Dispatch, such as an employee or student using a learning management system that we host or support.
- **Visitor**: A person visiting our website or expressing interest in our services through contact forms, event sign-ups, or interactions with our team.

## 2. The Information We Collect

## **Customer Information:**

If you are a customer, we collect personal data as part of our contractual relationship. This includes:

- Contact Information: Name, email, and company details.
- **Billing Information**: Payment details (excluding card data handled securely by third-party providers).
- Account Details: Usernames, passwords, and other login information.
- Transaction Information: Records of payments and service usage.

## End-User Information:

We act as a "data processor" for the personal data of our customers' end-users. The data we handle may include:

- Account Data: Student ID, Student Name, Course enrolment, Completion, and Progress.
- Course Data: Course performance, quiz scores, feedback, and certification records.

The customer (your employer, institution, or service provider) acts as the "data controller" and determines the data we process. For any questions or to exercise your rights regarding personal data, please contact the relevant customer.

# Visitor Information:

When you visit our website or express interest in our services, we may collect:

- Contact Information: Name, email address, phone number.
- **Browser Information**: IP address, browser type, cookies.
- Event Data: Information from webinars, newsletters, and online forms.

## 3. How We Use Your Information

We process your personal data for the following purposes:

- **To Fulfill Our Contractual Obligations**: We use your data to provide SCORM Dispatch services, support, and maintenance.
- To Manage Payments, we use third-party payment gateways to process payments. As required by UK law, we retain transaction records for up to 7 years but do not store card details.
- **For Communication and Marketing**: If you consent, we may use your information to send updates, offers, or information about SCORM Dispatch.

• For Security and Fraud Prevention: We may use your data to monitor for unauthorised access, misuse, or fraud.

# 4. Legal Basis for Processing

We process personal data based on the following lawful bases:

- **Contractual Obligation**: When processing is necessary to fulfil the contract between our customers and us.
- **Legitimate Interest**: When we process data to pursue legitimate business interests, such as improving services, while ensuring it does not infringe on your rights.
- **Consent**: For activities such as sending marketing information, where you have provided explicit consent.

## 5. How We Store and Protect Your Information

We store your data on secure servers with multiple layers of protection, including firewalls, encryption, and access controls. Data is stored in London, UK, and is protected under the GDPR.

We retain your personal information for as long as necessary to fulfil the purposes outlined in this policy or as required by law.

## 6. Data Sharing and Third Parties

We may share your information with the following third parties:

- **Service Providers**: Third-party providers like payment processors and hosting services. We ensure they comply with strict privacy and security standards.
- **Legal Obligations**: We may disclose data to comply with legal obligations, such as court orders, or to protect our legal rights.

We do not sell, rent, or trade your data to third parties for marketing purposes.

## 7. Your Rights Under UK Law

As a data subject, you have the following rights under the UK Data Protection Act 2018 and GDPR:

- Right to Access: You can request a copy of the personal data we hold about you.
- Right to Rectification: You can ask us to correct inaccuracies in your data.
- **Right to Erasure**: You can request the deletion of your data, subject to certain conditions.
- **Right to Restrict Processing**: You can ask us to restrict the processing of your data in certain circumstances.
- **Right to Object**: You can object to the processing of your data, especially for direct marketing purposes.
- **Right to Data Portability**: You can request the transfer of your data to another organisation.

To exercise your rights, please get in touch with us at support@aptitec.co.uk.

## 8. Cookies and Tracking Technologies

We use cookies to enhance the user experience on our website. You can manage your cookie preferences through your browser settings. For more information on how we use cookies, please refer to our Cookie Policy.

## 9. Changes to This Privacy Policy

We may update this policy from time to time. Any changes will be posted on this page, and, where appropriate, we will notify you via email or other communications.

### 10. Contact Us

For any questions or concerns regarding this privacy policy or to exercise your rights, please get in touch with us at:

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