

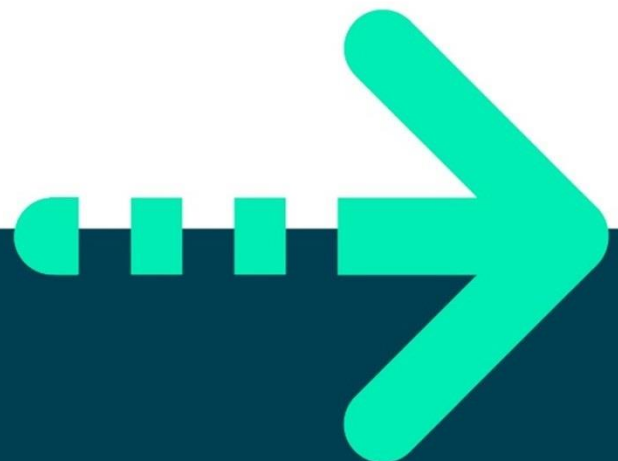


# WorkForce Learning Data Sharing and Processing Agreements

## CONFIDENTIAL

This document may be disclosed to any WFL customer in relation to the data processed within service delivery.

Date of Issue: 16 November 2023





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# 1 Introduction

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This document includes Data Sharing and Data Processing agreements for the management of data transacted between the Supplier (the relevant QA contracting 'brand') and its customers.

The third parties listed are the core set expected to be used within service delivery, however, there may be other third parties introduced depending on the nature of the services requested by the customer and within the management of delivery by Supplier. These additional third parties will be specified within the order.

# 2 Document Review

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This document shall be reviewed on a periodic basis not less frequently than annually or where the nature of services provided by the Supplier are varied.



### 3 QA Learning

<b>Data Controller/Processor</b>	Supplier will act as a Data Processor with the customer being the Data Controller.																																																														
<b>Subject matter and Purpose of data processing</b>	Management and delivery of training and learning services, including examination and certification.																																																														
<b>Nature of the processing</b>	The processing of Personal Data is required for the provision of the agreed services, which may include the collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data as described																																																														
<b>Categories of data subjects</b>	Employees and/or representatives of the client																																																														
<b>Type of personal data processed</b>	<ul style="list-style-type: none"> <li>- First name</li> <li>- Last name</li> <li>- Work email address</li> <li>- Job title</li> <li>- Line manager First and Last name</li> <li>- Line manager email address</li> <li>- Phone numbers</li> <li>- Booker email address</li> </ul>	<ul style="list-style-type: none"> <li>- Training delivery location</li> <li>- Courses booked, attended and/or progression</li> <li>- Exam administration, outcome and/or attainment</li> <li>- Evaluations of products and services</li> <li>- Complaints</li> <li>- Geo-location data (IP address)</li> <li>- Consent and marketing preferences</li> <li>- Marketing related data</li> </ul>																																																													
	Supplier may process personal email address and/or personal home address where the employee works remotely and requires course materials to be provided in physical form.																																																														
<b>Special category data (Sensitive data)</b>	Supplier may process health information where provided by the learner to request or implement reasonable adjustments to the learning or examination environment or conditions.																																																														
<b>Duration of processing</b>	Duration is term of contract plus appropriate retention periods to meet legal and regulatory requirements.																																																														
<b>Data Retention</b>	Personal Data will be retained in line with our retention policy and to comply with legal obligations. Learner and transactional record retention is current financial year plus six (6) years.																																																														
<b>Description of technical and organisational controls</b>	<ul style="list-style-type: none"> <li>● CIA Objectives - Confidentiality, Integrity, Availability</li> <li>● Information Ownership and Custodianship - Internal Governance</li> <li>● Information Risk Management</li> <li>● Privacy Compliance</li> <li>● Minimization and Limitation of Information Quantity</li> <li>● Data and Information Retention</li> <li>● Compliance with Privacy, Laws, Regulations, Customer Agreements</li> <li>● Management Oversight</li> <li>● Human Resources Security</li> <li>● Information Classification</li> </ul>	<ul style="list-style-type: none"> <li>● Least Privilege and Need to Know</li> <li>● System Classification</li> <li>● Information Handling</li> <li>● Location and Jurisdiction</li> <li>● Requests from Authorities, Governments or Third parties</li> <li>● Contractual Controls toward Providers, Supplier Assessment, Compliance Reporting</li> <li>● Secure SDLC Policy</li> <li>● Business Continuity</li> <li>● Disaster Recovery</li> <li>● Security Controls</li> <li>● Destruction and removal of Information or data</li> </ul>																																																													
<b>Return or Destruction of the Personal Data</b>	Data will be returned to the client or destroyed in line with contractual requirements. Data retained for legal and regulatory requirements will be sanitised when no longer required in line with NCSC guidance.																																																														
<b>Subprocessors &amp; Onward Transfers</b>	<p><b>Business Systems</b></p> <table border="1"> <tr> <td>Microsoft</td> <td>UK, EEA - Azure</td> <td>Iron Mountain</td> <td>UK</td> </tr> <tr> <td>Node4</td> <td>UK</td> <td>Centre for Excellence</td> <td>UK</td> </tr> <tr> <td>Adobe</td> <td>EEA - Azure</td> <td>Keepit</td> <td>UK</td> </tr> <tr> <td>Cisco</td> <td>UK and EU (Ireland)</td> <td>HubSpot</td> <td>USA, EEA</td> </tr> <tr> <td>Egress</td> <td>UK - Azure</td> <td>PwC / PaloAlto</td> <td>EU - GCP</td> </tr> <tr> <td>Vipre Security Ltd</td> <td>UK and EU (Ireland)</td> <td>Veritas</td> <td>EEA</td> </tr> <tr> <td>CommuniGator</td> <td>UK</td> <td>Egress Software Technologies Ltd</td> <td>UK</td> </tr> <tr> <td>Cisco</td> <td>UK</td> <td>Qualitrics</td> <td>UK, Ireland, USA, Canada, Germany, Australia, Japan</td> </tr> <tr> <td>MeasureUP</td> <td>USA</td> <td>Salesforce</td> <td>UK, USA</td> </tr> </table> <p><b>Delivery Platforms</b></p> <table border="1"> <tr> <td>Hands on Learning Solutions, LLC</td> <td>EEA - Azure</td> <td>Go Deploy Ltd</td> <td>UK, AWS, Microsoft Azure and Google Cloud Platform</td> </tr> <tr> <td>Cisco</td> <td>EEA - AWS Ireland &amp; Germany</td> <td>Cloud Academy</td> <td>USA - AWS US WEST2 (Oregon)</td> </tr> <tr> <td>Cornerstone Inc</td> <td>UK</td> <td>Mimeo</td> <td>UK, USA, EEA (Germany) - Azure, Google Cloud</td> </tr> <tr> <td>LogMeIn Ireland</td> <td>EEA, USA IDTA</td> <td>Open University</td> <td>UK</td> </tr> <tr> <td>Miro</td> <td>UK, USA</td> <td>GitHub</td> <td>USA</td> </tr> <tr> <td>Microsoft</td> <td>EEA - Azure</td> <td></td> <td></td> </tr> </table>			Microsoft	UK, EEA - Azure	Iron Mountain	UK	Node4	UK	Centre for Excellence	UK	Adobe	EEA - Azure	Keepit	UK	Cisco	UK and EU (Ireland)	HubSpot	USA, EEA	Egress	UK - Azure	PwC / PaloAlto	EU - GCP	Vipre Security Ltd	UK and EU (Ireland)	Veritas	EEA	CommuniGator	UK	Egress Software Technologies Ltd	UK	Cisco	UK	Qualitrics	UK, Ireland, USA, Canada, Germany, Australia, Japan	MeasureUP	USA	Salesforce	UK, USA	Hands on Learning Solutions, LLC	EEA - Azure	Go Deploy Ltd	UK, AWS, Microsoft Azure and Google Cloud Platform	Cisco	EEA - AWS Ireland & Germany	Cloud Academy	USA - AWS US WEST2 (Oregon)	Cornerstone Inc	UK	Mimeo	UK, USA, EEA (Germany) - Azure, Google Cloud	LogMeIn Ireland	EEA, USA IDTA	Open University	UK	Miro	UK, USA	GitHub	USA	Microsoft	EEA - Azure		
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<b>Data Processing Locations</b>	Supplier has staff within the UK and EEA who potentially may be required to access customer and learner data. Primary vendor data locations are noted in the Subprocessor section above.																																																														

## 4 QA Apprenticeships

<b>Data Controller/Processor</b>	Supplier will act as an independent Data Controller.																																																																																		
<b>Subject matter and Purpose of data processing</b>	Personal data in connection with management and delivery of apprenticeship programmes, including delivery, assessment, examination, progress and attainment.																																																																																		
<b>Nature of the processing</b>	The processing of Personal Data is required for the provision of the agreed services, which may include the collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data as described herein.																																																																																		
<b>Categories of data subjects</b>	Employees and/or representatives of the client																																																																																		
<b>Type of personal data processed</b>	<p><b>Learner:</b> First name, surname, business email address, personal email address (optional), phone number(s), identity verification, country of residence, nationality, ethnicity, date of birth/age, gender/legal sex, disabilities and/or medical conditions, written statement, NI number, passport number, educational achievements, career history &amp; status, personal qualities, skills, competencies &amp; achievements, interests &amp; hobbies, non-academic achievements, professional qualifications, languages spoken and driving licence status, Additional Learning Needs (ALN), address, employer, job title, next of kin, qualifications, programme learning plan, progress band, activities, Individual Learner Record (ILR) data, finance details, review summary, review detail, skill scans, functional skills achievement, End Point Assessment (EPA) tracking, photograph (optional), recruitment documents, marketing/consent preferences, contract alignment data, marketing related data, geo-locational data.</p> <p><b>Employer (line manager) related:</b> First name, surname, business email address, telephone number(s), marketing/consent preferences, marketing related data, geo-locational data.</p>																																																																																		
<b>Special category data (Sensitive data)</b>	Racial or ethnic origin Health data Sexual orientation																																																																																		
<b>Duration of processing</b>	Duration is term of contract plus appropriate retention periods, e.g. for legal and regulatory compliance (Ofsted and other HMG funding mandated requirements)																																																																																		
<b>Description of technical and organisational controls</b>	<ul style="list-style-type: none"> <li>• CIA Objectives - Confidentiality, Integrity, Availability</li> <li>• Information Ownership and Custodianship - Internal Governance</li> <li>• Information Risk Management</li> <li>• Privacy Compliance</li> <li>• Minimization and Limitation of Information Quantity</li> <li>• Data and Information Retention</li> <li>• Compliance with Privacy, Laws, Regulations, Customer Agreements</li> <li>• Management Oversight</li> <li>• Human Resources Security</li> <li>• Information Classification</li> </ul>	<ul style="list-style-type: none"> <li>• Least Privilege and Need to Know</li> <li>• System Classification</li> <li>• Information Handling</li> <li>• Location and Jurisdiction</li> <li>• Requests from Authorities, Governments or Third parties</li> <li>• Contractual Controls toward Providers, Supplier Assessment, Compliance Reporting</li> <li>• Secure SDLC Policy</li> <li>• Business Continuity</li> <li>• Disaster Recovery</li> <li>• Security Controls</li> <li>• Destruction and removal of Information or data</li> </ul>																																																																																	
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<b>Data Processing Locations</b>	Supplier has staff within the UK and EEA who potentially may be required to access customer and apprentice data. Primary vendor data locations are noted in the Subprocessor section above.																																																																																		



## 5 QA Talent

<b>Data Controller/Processor</b>	Supplier will act as a Data Processor with the customer being the Data Controller.																																										
<b>Subject matter and Purpose of data processing</b>	Provision of consulting and development resource to work with customer teams to deliver the contracted services.																																										
<b>Nature of the processing</b>	The processing of Personal Data is required for the provision of the agreed services, which may include the collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data as described																																										
<b>Categories of data subjects</b>	Employees and/or representatives of the client																																										
<b>Type of personal data processed</b>	<ul style="list-style-type: none"> <li>- First name</li> <li>- Last name</li> <li>- Work email address</li> <li>- Job title</li> <li>- Line manager First and Last name</li> <li>- Line manager email address</li> <li>- Phone numbers</li> </ul>	<ul style="list-style-type: none"> <li>- Project and engagement related personal data</li> <li>- Evaluations of products and services</li> <li>- Complaints</li> <li>- Geo-location data (IP address)</li> <li>- Consent and marketing preferences</li> <li>- Marketing related data</li> </ul>																																									
<b>Special category data (Sensitive data)</b>	None Processed																																										
<b>Duration of processing</b>	Duration is term of contract plus appropriate retention periods to meet legal and regulatory requirements.																																										
<b>Data Retention</b>	Personal Data will be retained in line with our retention policy and to comply with legal obligations. Financial transactional record retention is current financial year plus six (6) years.																																										
<b>Description of technical and organisational controls</b>	<ul style="list-style-type: none"> <li>● CIA Objectives - Confidentiality, Integrity, Availability</li> <li>● Information Ownership and Custodianship - Internal Governance</li> <li>● Information Risk Management</li> <li>● Privacy Compliance</li> <li>● Minimization and Limitation of Information Quantity</li> <li>● Data and Information Retention</li> <li>● Compliance with Privacy, Laws, Regulations, Customer Agreements</li> <li>● Management Oversight</li> <li>● Human Resources Security</li> <li>● Information Classification</li> </ul>	<ul style="list-style-type: none"> <li>● Least Privilege and Need to Know</li> <li>● System Classification</li> <li>● Information Handling</li> <li>● Location and Jurisdiction</li> <li>● Requests from Authorities, Governments or Third parties</li> <li>● Contractual Controls toward Providers, Supplier Assessment, Compliance Reporting</li> <li>● Secure SDLC Policy</li> <li>● Business Continuity</li> <li>● Disaster Recovery</li> <li>● Security Controls</li> <li>● Destruction and removal of Information or data</li> </ul>																																									
<b>Return or Destruction of the Personal Data</b>	Data retained for legal and regulatory requirements. No data is expected to be returned to the customer.																																										
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Transfers are made in accordance with the relevant legislative requirements which include SCC and IDTA. (Please note that sharing/transfers to the listed and additional third parties will vary depending on the requested service).																																											
<b>Data Processing Locations</b>	Supplier has staff within the UK and EEA who potentially may be required to access customer data. Primary vendor data locations are noted in the Subprocessor section above.																																										



## 6 Cloud Academy

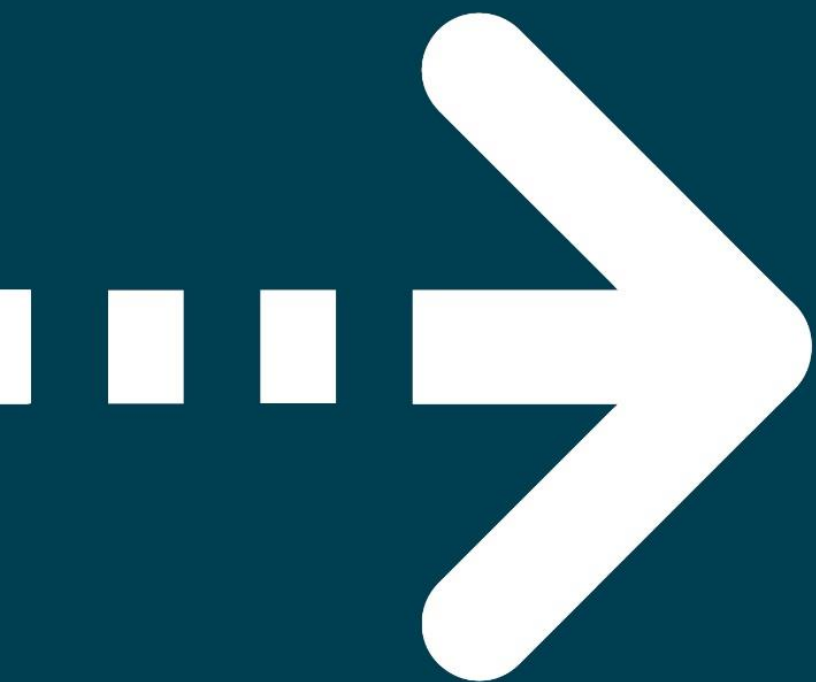
<b>Data Controller/Processor</b>	Supplier will act as a Data Processor with the customer being the Data Controller.			
<b>Subject matter and Purpose of data processing</b>	Management and provision of content delivery platform (the Portal) including skills assessment, examination, certification and marketing related activity.			
<b>Nature of the processing</b>	The processing of Personal Data is required for the provision of the agreed services, which may include the collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data as described herein. Data may be used for marketing purposes where consent or other lawful basis has been confirmed.			
<b>Categories of data subjects</b>	Employees and/or representatives of the client.			
<b>Type of personal data processed</b>	- First name - Last name - Email - Photo - IP address (Geo-location data) - Marketing related data	- Company - Country - Member since - Time zone - Activity logs - Consents - License related data	- Personal website - LinkedIn profile - Study plan - Exam details - Password(s) - Attainment - Complaints	- Hands on lab - Quizzes - Skills growth - Activities - Enquiries - Preferences
<b>Special category data (Sensitive data)</b>	None Processed			
<b>Duration of processing (Data Retention)</b>	Duration is term of contract plus appropriate retention periods to meet legal and regulatory requirements.			
<b>Description of technical and organisational controls</b>	<ul style="list-style-type: none"> <li>• CIA Objectives - Confidentiality, Integrity, Availability</li> <li>• Information Ownership and Custodianship - Internal Governance</li> <li>• Information Risk Management</li> <li>• Privacy Compliance</li> <li>• Minimization and Limitation of Information Quantity</li> <li>• Data and Information Retention</li> <li>• Compliance with Privacy, Laws, Regulations, Customer Agreements</li> <li>• Management Oversight</li> <li>• Human Resources Security</li> <li>• Information Classification</li> <li>• Information Handling</li> </ul>		<ul style="list-style-type: none"> <li>• Least Privilege and Need to Know</li> <li>• System Classification</li> <li>• Location and Jurisdiction</li> <li>• Requests from Authorities, Governments or Third parties</li> <li>• Contractual Controls toward Providers, Supplier Assessment, Compliance Reporting</li> <li>• Secure SDLC Policy</li> <li>• Business Continuity</li> <li>• Disaster Recovery</li> <li>• Security Controls</li> <li>• Destruction and removal of Information or data</li> </ul>	
<b>Return or Destruction of the Personal Data</b>	Data will be destroyed in line with legal and contractual requirements. Customers can discuss any requirement for Supplier to return data at the end of contracted period.			
<b>Subprocessors &amp; Onward</b>	6 sense	United States	Microsoft Azure (Labs)	United States
	Adobe	EEA (Ireland, Germany)	Microsoft Office365 / Azure	UK
	Algolia	United States	MixPanel	United States
	Alibaba Cloud	China	Outreach	United States
	Auth0	United States	PaloAlto (PwC)	UK
	AWS	United States	Pendo	United States
	Bitly	United States	Quora	Ireland/United States
	Calendly	United States	Quickbooks	United States
	Chartmogul	United States	Recurly.com	United States
	Churnzero	United States	Refract	United States
	Cloudingo (via Salesforce)	United States	Rollbar Inc	United States
	Cube.dev	United States	rusticsoftware.com	United States
	Daily	United States	Salesforce.com	United States
	Datadog	United States	Sostenuto	UK
	Egress Software	UK	Stackadapt	United States
	Meta	Ireland/United States	Stitchdata.com	United States
	Filestack	United States	StreamNative.io	United States
	g2.com	United States	Stripe.com	United States
	Google (Ads, Backups)	United States	Tackle.io	United States
	Google (GCP)	United States	Twilio Sendgrid	United States
	GoTo	United States	Usersnap	United States
	Hootsuite	Canada	WorkSpan	United States
	Hotjar	United States	Zapier, Inc.	United States
	Hubspot	United States	X (formerly Twitter)	United States
	KeepIt	UK	Zendesk	United States
	LaunchDarkly.com	United States	Zoom	United States
<b>Data Processing Locations</b>	CA have staff within the United States, UK, EEA, Philippines, Australia, New Zealand, Indonesia, Brazil, Canada, and the Turks and Caicos Islands who potentially may be required to access customer data. Primary vendor data locations are noted in the Subprocessor section above. Please refer to CA's privacy notice ( <a href="https://cloudacademy.com/privacy/">https://cloudacademy.com/privacy/</a> ) for details of its processing.			



# 7 Circus Street

<b>Data Controller/Processor</b>	Supplier will act as a Data Processor with the customer being the Data Controller.			
<b>Subject matter and Purpose of data processing</b>	Creation, management and delivery of training and learning services, including assessment.			
<b>Nature of the processing</b>	The processing of Personal Data is required for the provision of the agreed content creation and portal services, which may include the collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data as described herein.			
<b>Categories of data subjects</b>	Employees and/or representatives of the client			
<b>Type of personal data processed</b>	<ul style="list-style-type: none"> <li>- First name</li> <li>- Last name</li> <li>- Work email address</li> <li>- Portal profile information</li> <li>- Job title</li> <li>- Line manager First and Last name</li> <li>- Line manager email address</li> <li>- Phone numbers</li> <li>- Booker email address</li> </ul>	<ul style="list-style-type: none"> <li>- Training delivery location</li> <li>- Courses booked, attended and/or progression</li> <li>- Exam administration, outcome and/or attainment</li> <li>- Evaluations of products and services</li> <li>- License related information</li> <li>- Complaints</li> <li>- Geo-location data (IP address)</li> <li>- Consent and marketing preferences</li> <li>- Marketing related data</li> </ul>		
<b>Special category data (Sensitive data)</b>	None Processed			
<b>Duration of processing</b>	Duration is term of contract plus appropriate retention periods to meet legal and regulatory requirements.			
<b>Data Retention</b>	Personal Data will be retained in line with our retention policy and to comply with legal obligations. Learner and transactional record retention is current financial year plus six (6) years.			
<b>Description of technical and organisational controls</b>	<ul style="list-style-type: none"> <li>● CIA Objectives - Confidentiality, Integrity, Availability</li> <li>● Information Ownership and Custodianship - Internal Governance</li> <li>● Information Risk Management</li> <li>● Privacy Compliance</li> <li>● Minimization and Limitation of Information Quantity</li> <li>● Data and Information Retention</li> <li>● Compliance with Privacy, Laws, Regulations, Customer Agreements</li> <li>● Management Oversight</li> <li>● Human Resources Security</li> <li>● Information Classification</li> </ul>	<ul style="list-style-type: none"> <li>● Least Privilege and Need to Know</li> <li>● System Classification</li> <li>● Information Handling</li> <li>● Location and Jurisdiction</li> <li>● Requests from Authorities, Governments or Third parties</li> <li>● Contractual Controls toward Providers, Supplier Assessment, Compliance Reporting</li> <li>● Secure SDLC Policy</li> <li>● Business Continuity</li> <li>● Disaster Recovery</li> <li>● Security Controls</li> <li>● Destruction and removal of Information or data</li> </ul>		
<b>Return or Destruction of the Personal Data</b>	Data will be returned to the client or destroyed in line with contractual requirements. Data retained for legal and regulatory requirements will be sanitised when no longer required.			
<b>Subprocessors &amp; Onward Transfers</b> Transfers are made in accordance with the relevant legislative requirements which include SCC and IDTA.  (Please note that sharing/transfers to the listed and additional third parties will vary depending on the requested service).	<b>Business Systems</b>			
	Amazon Web Services Inc	Ireland	Zoom	UK & USA
	Zendesk Inc.	UK & USA	Salesforce	UK & USA
	Google Inc	UK & USA	Hubspot	UK & USA
	Postmark	USA	Turtl	UK
	TypeForm	Spain	Notion	USA
	Survey Monkey Inc.	UK & USA	Microsoft Inc	UK & USA
	Circus Street Inc	USA	Circus Street Australia Pty Limited	Australia
	QA Limited	UK	JAMF	UK
	Miro	UK, USA	Roadmunk	EEA, USA, Australia
	Xero	New Zealand	Cloud Academy	USA and EEA
	Avidly	Finland, Sweden, Denmark and Canada	Bitwater Learning Inc	USA
	Potential	UK		
<b>Data Processing Locations</b>	Supplier has staff within the UK and EEA who potentially may be required to access customer and learner data. Primary vendor data locations are noted in the Subprocessor section above.			





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