

## **EAST BRIDGE TRAINING (EBT)**

### **DATA PROTECTION POLICY**

**Policy Reference:** EBT-POL-DP-008

**Version:** 1.0

**Policy Created:** September 2025

**Effective Date:** 10 September 2025

**Review Date:** 10 September 2026

**Approved By:** Director, East Bridge Training (EBT)

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#### **1. Purpose**

This Data Protection Policy ensures that East Bridge Training (EBT) collects, processes, stores, and manages personal data in accordance with:

- **KHDA Vocational Standards A1.13, A2.10, A3.5, A4**
- **UAE Federal Decree-Law No. 45 of 2021** (Personal Data Protection Law – PDPL)
- **Executive Council Resolution No. 30 of 2021**
- **Awarding body data protection requirements**
- **Any applicable Dubai government or free zone regulations**

The policy establishes a secure, transparent, and ethical framework for handling personal data of learners, staff, and stakeholders.

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#### **2. Scope**

This policy applies to:

##### **Data Subjects**

- Learners
- Applicants
- Staff and trainers
- Assessors and internal verifiers
- Contractors
- Visitors

- Awarding body representatives
- Industry partners

## **Data Categories**

- Personal data
- Sensitive personal data (where applicable)
- Academic records
- Attendance and assessment data
- Financial and billing information
- LMS and attendance logs
- Communication logs
- Certification & registration data

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## **3. Policy Statement**

EBT is committed to:

- Protecting personal data with the highest standards of security
- Ensuring lawful, fair, and transparent data processing
- Collecting only necessary and relevant data
- Preventing unauthorised access, disclosure, alteration, or destruction
- Providing individuals the right to access, update, or request deletion of their data
- Maintaining compliance with KHDA, UAE PDPL, and awarding body rules
- Ensuring KHDA has access to required learner data (A1.13)
- Ensuring confidentiality and integrity of all stored records (A2.10)

No personal data is sold, shared, or transferred to unauthorized third parties.

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## **4. Definitions**

### **4.1 Personal Data**

Information that identifies an individual (e.g., name, passport number, phone, email, Emirates ID).

#### **4.2 Sensitive Data**

Information such as health details, special needs documentation, or biometric identifiers.

#### **4.3 Data Controller**

East Bridge Training (EBT), which determines how personal data is processed.

#### **4.4 Data Processor**

Any entity processing data on behalf of EBT (e.g., LMS platforms, cloud storage providers).

#### **4.5 Processing**

Any operation involving personal data: collection, storage, retrieval, transmission, deletion.

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### **5. Types of Data Collected**

EBT collects data required for:

#### **Learner Admissions**

- Application form
- Passport/EID details
- Educational certificates
- Demographic information

#### **Learning & Assessment**

- Attendance records
- Assessment results
- Feedback
- Portfolio evidence
- Progress records

#### **Certification**

- Registration data

- Certification claims
- KHDA attestation information

## **Operations**

- Payment details
- Communications logs
- CCTV recordings (if applicable)

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## **6. Lawful Basis for Processing**

Data is processed based on:

1. **Regulatory obligations** (KHDA, awarding bodies)
2. **Contractual necessity** (training delivery)
3. **Legitimate interest** (improving services, quality assurance)
4. **Consent** where required
5. **Legal obligations** (UAE laws, financial record-keeping)

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## **7. Confidentiality & Security Measures**

EBT ensures compliance with KHDA Standard A2.10 by implementing:

### **7.1 Access Control**

- Restricted access to authorised staff
- Password-protected systems
- Role-based system permissions

### **7.2 Data Storage**

- Encrypted digital storage
- Secure servers and LMS systems
- Backup systems to prevent data loss

### **7.3 Physical Security**

- Secure filing cabinets
- Restricted office access in Dubai Knowledge Park
- CCTV monitoring (if applicable)

#### **7.4 Data Transmission**

- Encrypted communication channels
- Secure email protocols
- Approved digital platforms only

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### **8. Rights of Data Subjects**

In accordance with UAE PDPL and KHDA A1.13, individuals may request:

- Access to their data
- Correction or update
- Restriction of processing
- Deletion (where legally permissible)
- Transfer of their data (data portability)
- Information on how their data is used

EBT responds to requests within **15 working days**.

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### **9. Data Retention**

EBT follows KHDA A3.9 and A4.10:

- Academic records, assessment outcomes, certification files: **minimum 5 years**
- Attendance logs: **5 years**
- Admissions files: **5 years**
- Finance and payment records: **as per UAE financial law**
- Staff records: **duration of employment + 5 years**

After retention expiry, data is securely destroyed.

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## **10. Sharing of Data**

EBT may share data with:

### **10.1 KHDA**

Required learner and certification data for auditing and regulatory needs.

### **10.2 Awarding Bodies**

For learner registration, certification, external verification, and quality assurance.

### **10.3 Government Authorities**

Where legally required (e.g., law enforcement, immigration, judicial orders).

### **10.4 External Educational Partners**

Only where a formal agreement and learner consent exist.

EBT does **not** share data with third parties for marketing or commercial purposes.

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## **11. LMS & Digital Platforms**

EBT uses LMS and digital tools for:

- Attendance tracking
- e-Assessments
- Communication
- Resource distribution

All platforms:

- Must be approved by EBT
- Must be compliant with data security standards
- Must not store or transfer data outside permitted jurisdictions

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## **12. Staff Responsibilities**

All staff must:

- Maintain confidentiality
- Use learner data only for official duties
- Follow secure data handling procedures
- Avoid storing files on personal devices
- Report any data breach immediately

Breach of this policy results in disciplinary action.

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### **13. Data Breach Procedure**

In the event of a breach, EBT will:

1. Identify and contain the breach immediately
2. Notify the Director and Quality Nominee
3. Record the breach in the incident register
4. Notify affected individuals if required
5. Inform KHDA where applicable
6. Implement corrective actions to prevent recurrence

All breaches are investigated under **EBT's Staff Malpractice & Maladministration Policy**.

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### **14. Use of Data for Quality Assurance**

To comply with KHDA B6 Standards, EBT may use anonymised data for:

- Performance monitoring
- Employability tracking
- Learning analytics
- Programme evaluation
- Benchmarking

No personally identifiable data is shared without consent.

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## **15. Training & Awareness**

EBT provides:

- Mandatory staff training on data protection
- Annual refresher sessions
- Guidance for new staff during induction
- Updates when laws or KHDA requirements change

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## **16. Conflict of Interest**

Staff must not:

- Access personal data for non-work purposes
- Share data with any party where a conflict exists
- Manipulate data for personal or professional gain

This supports KHDA Standard A1.4 & A4.1(b).

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## **17. Appeals**

Individuals may appeal any data-related decision through the **EBT Appeals & Grievances/Complaints Policy** within **5 working days**.

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## **18. Roles & Responsibilities**

### **Director**

Responsible for overall data protection compliance.

### **Quality Nominee**

Ensures systems meet KHDA and PDPL requirements.

### **Data Protection Officer (If Assigned)**

Oversees implementation, audits, and breaches.

### **Staff**

Follow all procedures and safeguard data.

#### **Learners**

Provide accurate information and maintain personal data confidentiality.

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#### **19. Policy Review**

This policy is reviewed annually in accordance with KHDA requirements and UAE PDPL updates.

Next review due: **10 September 2026**

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#### **Approval**

**Name:** Shivanjan Chakraborty

**Title:** Director, East Bridge Training

**Signature:** *Shivanjan Chakraborty*

**Date:** 10 September 2025