



## Privacy Notice

DRS is committed to protecting and respecting the privacy of your personal data. This privacy notice explains how your data is collected, used, transferred and disclosed by us. It applies to data collected when you participate in our training or events; use our website, products or services; interact with us through social media, email, post, text or phone; apply for employment with us; or are employed by us.

This privacy notice explains:

- who is DRS?
- the Data Protection Office;
- what is personal data?
- how we keep your data secure;
- the data we collect about you;
- how we collect your data;
- the legal basis for processing your personal data;
- how we use your data;
- communication preferences;
- analytics and targeted advertising;
- how we share your data;
- international transfers;
- your rights; and
- how to contact us.

### Who is DRS?

DRS Data Services Limited ('DRS') was established in 1969 as a data capture bureau offering printing and scanning services in London. During this time the Company has developed its expertise to include the design and manufacture of imaging and Optical Mark Recognition (OMR) scanners, as well as software solutions for the examination and assessment markets. In August 2016 DRS was acquired by AQA Education Ltd (registered office: Devas Street, Manchester, M15 6EX), an independent education charity and the largest provider of academic qualifications in UK schools and colleges ([www.aqa.org.uk](http://www.aqa.org.uk)). DRS is now part of the AQA family and continues to focus on delivering large-scale solutions for examination processing and electronic marking. DRS is a private limited company registered in England and Wales (registered number 055683370) and its registered address is 1 Danbury Court, Linford Wood, Milton Keynes MK14 6LR.

### The Data Protection Office

DRS has established a Data Protection Office to oversee the activities we undertake to ensure that your personal data is handled ethically and in line with our legal obligations. If you have any questions about the way in which we collect, hold or process your data please send them to our Data Protection Office at [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk). Our Data Protection Officer is John Hancock.

### What is personal data?

Personal data is any information which identifies and is about a living person. It might be possible to identify the individual through a single, specific identifier, such as a name; or by combining several different identifiers, such as job role and team. Some information is considered particularly sensitive because of the serious impact that it might have on the individual concerned if the data was lost or stolen. This 'special category' data includes: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; and genetic and biometric data (such as your fingerprint). We may collect special categories of personal data about

examination candidates, job applicants, event attendees, and employees, where we have a lawful basis to do so.

## How we keep your data secure

We have put appropriate organisational safeguards and security measures in place to protect your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We keep your data confidential within a secure infrastructure protected by multiple firewalls and we are committed to keeping the security of these systems as up-to-date and as secure as possible. We also limit access to your personal data to those employees, associates, contractors and other third parties who have a business need to know it. They will only be permitted to process your data on our instructions and will always be subject to a duty of confidentiality.

We require any third party who is contracted to process your personal data on our behalf to have security measures in place to protect your data and to treat such data in accordance with the law. We have put in place procedures to deal with any suspected personal data breach and will notify you and the UK Information Commissioner of a breach where we are legally required to do so.

## The data we collect about you

The following groups of personal data may be collected and processed by DRS:

- **Identity Data** such as your first name, last name, title, date of birth, gender, candidate number;
- **Contact Data** such as your e-mail address, address, and telephone number(s);
- **Pupil Data** such as UPN, centre number, admission number, year group, registration group, teacher name, class, supervisor name, ethnicity, eligibility for free school meals, FSM6, pupil premium indicator, SEN status, LEA care status.
- **Financial Data** such as your bank account details;
- **Transaction Data** such as details of the software products and services you have obtained from us, purchase order details, and payments made to/from us;
- **Technical Data** such as your internet protocol (IP) address, login data, operating system and platform;
- **Marketing Data** such as your marketing and communication preferences in receiving communications from us and our third parties, the technologies used, and any related correspondence;
- **Usage Data** such as your use of our website, performance and other communication data;
- **Survey Data** such as your comments and opinions provided in response to a survey.

In addition, we may collect the following additional groups of data with respect to job applicants, employees or ex-employees, associates, contractors, and temporary employees:

- **Identity Data** such as proof of your identity (e.g. passport, valid driving licence or birth certificate);
- **Contact Data** such as information about your marital status, next of kin, dependants, personal and emergency contacts details to be used in the event of an emergency;
- **Recruitment Data** such as details of your education, qualifications, occupation, work history, experience, referees, training and skills development; nationality, entitlement to work in the UK, criminal record (if your role requires this) and equal opportunities monitoring information;
- **Employment Data** such as the terms and conditions of your employment, salary or fee payments, benefits, work patterns, NI number, attendance, holidays, sickness, disciplinary or grievance issues, medical or health conditions, disabilities (for which DRS needs to make reasonable adjustments);

and information about your vehicle, driving licence, MOT and insurance documents if you drive on company business;

- **Performance Data** such as performance reviews and ratings, performance development plans and related correspondence; and timesheet information;
- **Activity Data** such as the websites our employees visit while using a DRS computer or DRS network, and the activity logs held within DRS systems and databases;
- **Communications Data** such as the emails you send or receive via the DRS email system.

We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## How we collect your data

We may collect personal data from you when you: participate in training, surveys or related events; use our website, products or services; interact with us through social media, email, post, text or phone, or use one of our [cookies](#). In addition, we will also collect personal data from job applicants, employees, ex-employees, contractors and temporary employees during their recruitment screening and throughout the tenure of their employment with us.

## The legal basis for processing your personal data

The law requires us to inform you of the legal basis for collecting and processing your personal data, where we are the Data Controller, or Joint Data Controller. These include:

- **Performance of contract:** In most cases, this occurs when we have a contract with you to either provide a product or service to you, or to receive something from you. Examples include: employment contracts; affiliate or reseller contracts; agreements for the provision of our products or services; and procurement contracts. We are also acting under the performance of contract if we collect or process your data for the purposes of entering into a contract, if you have expressed an interest in working with us.
- **Legitimate interests:** We may have a legitimate interest in processing certain personal data, which does not relate to the performance of a contract agreed with you. If we rely on our legitimate interests to justify processing your data, we will have conducted an assessment to evaluate the fairness of this; and will only undertake the processing if it is reasonable to do so and will not cause undue risk to you.
- **Legal obligation:** We may be legally obliged to process certain data about you, for example to report the results of examinations, or protect employee safety while travelling on DRS business. In some cases, we are obliged to share personal data with third parties, such as DfE and HMRC.
- **Public Interest:** We are obliged to maintain a permanent record of your assessment data (e.g. examination history, subject, grade, and type of qualification) under the 'Conditions of Recognition' defined by Ofqual, underpinned by the Apprenticeships, Skills, Children and Learning Act (2009). This is both a legal obligation and necessary for the performance of a task carried out in the public interest.
- **Consent:** In general, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to individuals via email or text message. Where we would like to be able to contact you about our products and services, and no other legal basis applies, we will seek your consent to retain and re-use your contact details for that purpose. You have the right to withdraw consent to marketing at any time by contacting our Data Protection Officer at [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk).

## How we use your data

Your personal data is used by us to support a range of different purposes and activities. These are listed in the table below together with the types of data used and the legal base(s) we rely on when processing them, including where appropriate, our legitimate interests. Please be aware that we may process your personal data using more than one lawful basis, depending on the specific activity involved. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one basis is set out below.

Purpose / Activity	Type of Data	Lawful Basis
To process tests and examination papers and maintain a record of the examination results (this includes the security and integrity of the examination process, the timely delivery of accurate results to awarding bodies; and our compliance with statutory regulations).	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Assessment</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (e.g. to maintain and develop our core products and services and in a regulated environment)</li> <li>• Legal obligation</li> <li>• Public interest</li> </ul>
To develop, deliver and publicise educational products, resources and training.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing</li> <li>• Survey</li> <li>• Assessment</li> <li>• Pupil</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (e.g. to maintain and develop our core products and services and in a regulated environment)</li> </ul>
To promote education for the public benefit (this includes the provision of dedicated support and mentoring to young people through the DRS Apprenticeship scheme).	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing</li> <li>• Survey</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (e.g. to promote education for the public benefit)</li> <li>• Consent</li> </ul>
To manage our relationship with you, including: providing you with any information, products or services that you request from us; notifying you about changes to our products, services, events, terms and conditions or privacy notice; statistical analysis, market research, marketing and support.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services)</li> </ul>
To create an account, register you as a new customer and administer your account.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>

Purpose / Activity	Type of Data	Lawful Basis
To process and deliver your order including: delivery of products and product features, recording your order details; keeping you informed about the order status; issuing product renewal notices, taking and processing payments and refunds, collecting money owed to us; and assisting fraud prevention and detection.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (e.g. to recover debts due to us)</li> </ul>
To use data analytics to: improve our website, products, services, marketing, customer relationships and experiences; and for market research, statistical and survey purposes.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing</li> <li>• Survey</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To register you for email updates, and recommend products and services and events that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
To gather your opinions on our products and services, or on your experiences of DRS.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Survey</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
To protect the security of commercial and personal and special category data in our care by securing and monitoring activity within our network, internet and email.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Technical</li> <li>• Usage</li> <li>• Activity</li> <li>• Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (protecting the data entrusted to us by customers and commercially sensitive data about our business)</li> </ul>

For job applicants, employees, ex-employees, contractors and temporary employees only:

Purpose / Activity	Type of Data	Lawful Basis
To recruit the right people for our business, and manage their working relationship with us, including job role and responsibilities, salary or fee payments, progression, training, performance management and disciplinary or grievance procedures.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Recruitment</li> <li>• Financial</li> <li>• Transaction</li> <li>• Activity</li> <li>• Employment</li> <li>• Performance</li> <li>• Technical</li> <li>• Usage</li> <li>• Survey</li> <li>• Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (e.g. to monitor equal opportunities, to gather employee feedback; to contact your next of kin in case of emergency)</li> </ul>

Purpose / Activity	Type of Data	Lawful Basis
To arrange travel for you on DRS business and making appropriate safety arrangements for this, including monitoring your travel.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (e.g. to contact your next of kin in case of emergency).</li> </ul>

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we wish to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We may process personal data without your consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure and Barring Service (DBS) checks may be carried out on job applicants or employees employed for specific roles, with their consent, to guard against the risk of fraud or other unlawful acts being inflicted upon our candidates, customers, partners or employees. We would encourage you to discuss any concerns you have regarding DBS checks with us directly.

We will keep your personal data for no longer than is necessary for the purpose(s) it was provided for and to meet our accounting, reporting, legal obligations and public interest responsibilities. Further details of the retention periods we apply to your data are available on request from [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk).

If you have any questions about how DRS uses any of your personal data, please contact our Data Protection Office at [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk).

## Communications preferences

We may send you information about our products, services, activities and forthcoming events: by email if you have signed up to our email newsletters; or in accordance with your communication preferences if you have provided us with your details when you registered with us or consented to receiving such communications. If you do not wish to continue receiving information from us, you can 'opt-out' at any time by contacting us directly at [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk).

We will process all opt-out requests as soon as possible, but please note that due to the nature of our IT systems it may take a few days for any opt-out request to be implemented.

Our website may include links to and from the websites of our parent company and other relevant organisations. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to their websites.

## Analytics and targeted advertising

We use a range of analytics and targeted advertising tools to deliver relevant website content and information to you. For example, we use tools such as Google Analytics to target and improve our marketing campaigns, marketing strategies and website content. We may also use tools provided by other third parties to perform similar tasks that help to keep our website updated and relevant to you.

We may also collect your data where you partially complete and/or abandon data entered on our websites and/or other online forms and may use this data to contact you to remind you to complete any outstanding information and/or for marketing purposes.

We use cookies to help us provide you with a personalised service and to help make our websites and products better for you. For more information about the cookies we use please refer to the [DRS Cookie Policy](#).

Please note: you can opt-out of the Google Display Advertising Features using Ad Settings or the Google Analytics opt-out browser add on. In addition, the Digital Advertising Alliance (which includes companies such as Google and Facebook) provides a tool called [WebChoices](#) that can perform a quick scan of your computer or mobile device(s) and adjust your browser preferences accordingly. Doing so, however, may restrict the functionality of our website and a large proportion of other websites around the world as cookies are a common feature of most modern websites.

## How we share your data

We may disclose and share your personal data with the parties set out below, for the purposes outlined in the tables above:

- The AQA group of companies (AQA Education, Doublestruck, DRS Data Services Limited and Oxford International AQA Examinations);
- government agencies, their partners and other third parties to comply with our legal obligation or public interest responsibilities (such as Ofqual, DfE, HMRC, Magistrates Courts, Employment Tribunals and Local Authorities);
- affiliates, business partners, suppliers (including their sub-contractors) or other third parties that we use to support the operation of our business. For example, to: carry out criminal or credit checks; support the logistics involved in the secure storage and transportation of exam papers; provide IT systems and software, internet access, website or hosting solutions; organise events or provide marketing and advertising services; provide training and development services; deliver employee benefits, run our payroll, perform occupational health checks and referrals, and provide employee assistance;
- our professional advisers including auditors, lawyers, bankers and insurers who provide professional advice, accounting, banking, legal, insurance, and pension services, or to meet our audit responsibilities;
- where you have consented for us to do so. For example, if you have given your consent for us to share your data with a third party in respect of an event, we may pass your data on to the relevant third party administering the event.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may add to your personal data any information we obtain from third parties that are allowed to share your data with us. This may include data from our examination centres, schools and colleges, the Department for Education, search data providers or public sources. In each case we will do only what is allowed by relevant laws.

We may share non-personally identifiable information about the use of our websites or products publicly or with third parties, however, this will not include data that can be used to identify you.

## International Transfers

We may use service providers based outside of the EEA to help us provide our websites and products (for example, marketing service providers). This means that we may transfer some of



your data to service providers outside the EEA for the purpose of providing our applications, services and advertising to you.

Where data is transferred outside of the EEA to our service providers, we take steps to ensure that appropriate measures and controls are in place to protect that data in accordance with relevant data protection laws and regulations. In each case, such transfers are made in accordance with the requirements of Regulations (EU) 2016/679 (the General Data Protection Regulations or “GDPR”) and may be based on the use of the European Commission’s Standard Model Clauses for transfers of personal data outside the EEA. More information about this is available [here](#).

By using our websites or products or by interacting with us in the ways described in this Privacy Notice, you consent to the transfer of your data outside the EEA in the circumstances set out in this Privacy Notice. If you do not want your data to be transferred outside the EEA you should not use our websites or products.

## Your Rights

You have several rights under the data privacy legislation. This includes, under certain circumstances, the right to:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data;
- request the restriction of processing of your personal data;
- request the transfer of your personal data;
- object to processing of your personal data;
- object to automated decision making; and
- complain to us and the Information Commissioner.

Details of each of these rights are set out below:

- **Access your data:** You can access the data we hold on you at any time, by making a Data Subject Access Request. The more specific you can be about what you want to know, the better. We will need to confirm your identity before we release data to you.
- **Rectify your data:** You can ask us to correct any data we hold about you that is inaccurate.
- **Request erasure:** You have the right to ‘be forgotten’, in certain circumstances. This right does not apply if it would prevent the performance of a contract with you or if there is another legal requirement for us to retain your data. If erasure is not possible, you may be able to ask us to restrict processing.
- **Request the restriction of processing of your data:** You may ask us to suspend the processing of your data under certain circumstances, for example pending a review of the accuracy of the data or after you have objected to our use of the data, and we need to establish whether we may lawfully continue processing it.
- **Request the transfer of your data:** In some cases, you can ask us to transfer the data you originally provided to us to yourself or to another company. This only applies to data you provided directly, or that we observed about you through automated means.
- **Object to the processing of your data:** You can object to our processing of your data for direct marketing purposes, or on the basis of our stated legitimate interests (defined in the table above). In some cases, we may have compelling lawful grounds to process your data which override your rights and freedoms.
- **Object to automated decision-making:** You can also object to the processing of your personal data where profiling is being used to make assumptions about your behaviours or preferences; for example, to target marketing communications. You have the right not to be subject to automated decision-making and can require that any such decisions are reviewed by a human.



- **You can lodge a complaint:** If you believe your data is being handled in a way that breaches data protection legislation, you can lodge a complaint with us directly. You also have the right to complain to the UK Information Commissioner. Please be aware that we take the handling of your personal data very seriously. As such, we would always appreciate the opportunity to address any concerns you may have directly with you.

If you wish to exercise any of these rights, or lodge a complaint please contact our Data Protection Office at [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk). You will not normally have to pay a fee, however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will always try to respond to any legitimate request within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **How to contact us**

If you have any questions or concerns about the way in which we collect, hold or process your data, or simply wish to exercise your rights (as identified in the previous section) please contact us directly. The address for our Data Protection Office is [DataProtectionOfficer@drs.co.uk](mailto:DataProtectionOfficer@drs.co.uk). Our Data Protection Officer is John Hancock.