

IWCF Operations Limited



Privacy Policy

Document Revisions

Date	Version Number	Document Changes
30-05-2018	1.0	Initial Draft to align with GDPR requirements



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IWCF Operations Limited (incorporated under the Companies Acts with registered number SC568731 and having its registered office at Inchbraoch House, South Quay, Montrose, Angus DD10 9UA (“**IWCF**”, “**we**”, “**us**” or “**our**”)) is a subsidiary of the International Well Control Forum (a Scottish Charitable Incorporated Organisation incorporated under the Charities and Trustee Investment (Scotland) Act 2005 (Scottish charity number SC045842) and having its principle office at Inchbraoch House, South Quay, Montrose, Angus DD10 9UA). We develop and administer well control training, assessment and certification programmes on behalf of the exploration and production sector of the oil and gas industry.

We are committed to preserving your privacy and will use information you provide us in accordance with the applicable Data Protection Laws. For the purposes of this Privacy Policy, “**Data Protection Laws**” shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “**GDPR**”) and any other laws, regulations and provisions relating to the processing of personal data applicable in the United Kingdom.

We are the data controller of all personal information which is provided to us in accordance with this Privacy Policy.

Please read the following Privacy Policy to understand how we use and protect the information that you provide to us. By providing your information, you acknowledge that you have read and understood the Privacy Policy.

1. How we collect information from you and what information we collect from you.

We may collect information about in the following ways:

- 1.1. by completing a form or application required by us in connection with the Services. [The form or application may be completed by you or the centre [you are employed by / contract with]];
- 1.2. by providing your CV as requested under the form or application noted above;
- 1.3. if you contact us about the Services we provide;
- 1.4. We may collect and process the following information about you:
- 1.5. your name, contact details, e-mail address, passport details, telephone number, date of birth;
- 1.6. information relating to your qualifications received, current job title, employment history and any other details you provide in your CV;
- 1.7. any other information you provide us pursuant to the above ways of collecting data.

2. Use of you Information

We collect and process the information held about you: (i) when we are required to comply with a legal obligation; and/or (ii) if the processing is for our legitimate interests or those of a third party, as noted below.

We process your information:

- 2.1. to enable us to supply the Services;
- 2.2. to assess your skills, qualifications and suitability to provide the training pursuant to the Services;
- 2.3. to keep records of those persons providing training through the centres;
- 2.4. to comply with legal or regulatory requirements including dealing with any disputes that may arise;



- 2.5. for all other purposes consistent with the proper performance of our Services, operations and business;
- 2.6. to contact you in relation to the training you may providing or are providing for us.

We will only use your information for the purposes for which we collected it as detailed above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Specific information collected about you may be subject to other uses which will be communicated to you separately.

3. Retention of Information

We will hold your information for as long as is necessary in relation to the purposes for which we collected the data. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for which we processed the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

4. Disclosure of your Information

The information you provide to us will be treated as confidential. However, we may disclose your information to other third parties who act for us for the purposes set out in the policy (such as affiliated training centres) or for purposes approved by you.

In addition, if we enter into a joint venture with or sold to or merged with another entity, your information may be disclosed to our new partners or owners.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

5. Sharing your data and transfers outside the UK and EEA

We may, at times, require to share your information with third parties for the purposes as detailed above, including suppliers of services to IWCF and relevant Training Centres. At all times we will do so in accordance with Data Protection Laws. Given that IWCF provides services globally, such third parties, particularly Training Centres, may be located outside the UK and EEA.

6. Security

We employ security measures to protect your information from access by unauthorised persons and against accidental or unlawful processing, loss, alteration, destruction, disclosure or damage.

Please help us keep our records updated by informing us of any changes to your details.

7. Changes to our Privacy Policy

We may amend this policy from time to time. If we make any substantial changes we will notify you by automated message via your FORUM login or email.



8. Your rights

Under certain circumstances, in accordance with Data Protection Laws, you have the right to:

- 8.1. Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- 8.2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- 8.3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- 8.4. Object to the processing of your personal information where we are relying on a legitimate interest (or a legitimate interest of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;
- 8.5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it; and
- 8.6. Request the transfer of your personal information to another party.

If you want to access, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact compliance@iwcf.org

You also have the right to complain to the Information Commissioner’s Office in relation to our use of your information.

9. Contact us

To contact us with any questions relating to this policy or our privacy practices generally, please e-mail compliance@iwcf.org