

PRIVACY POLICY

Last updated: 12 February 2026

1. Identity of the Data Controller

Skilltrade, located at Johan van Hasseltweg 39D, 1021 KN Amsterdam, The Netherlands, acts as the Data Controller within the meaning of Article 4(7) of the General Data Protection Regulation (EU) 2016/679 ('GDPR') with regard to the processing of personal data described in this Privacy Policy.

Contact details:

Email: office@skilltrade.nl

Phone: (+31) 20 3039804

2. Categories of Personal Data Processed

Depending on the relationship with the data subject, Skilltrade may process the following categories of personal data:

- Identification data (name, email address, telephone number, company details)
- Billing and payment information
- LMS account data (Moodle) and learning activity records
- Study progress, examination results, and certification records
- Recordings of online lessons (where applicable)
- Proctoring data, including video, audio, screen recordings, and identity verification data (where applicable)
- Technical data such as IP address, device information, and log files

3. Purposes and Legal Bases for Processing

Personal data is processed solely for specified, explicit, and legitimate purposes, including:

- Performance of a contract relating to training courses and examinations (Article 6(1)(b) GDPR)
- Compliance with legal obligations, including statutory tax and accounting retention requirements (Article 6(1)(c) GDPR)
- Safeguarding examination integrity and fraud prevention through online proctoring (Article 6(1)(f) GDPR – legitimate interest)
- IT security, system monitoring, and quality assurance (Article 6(1)(f) GDPR)
- Marketing communications based on prior consent (Article 6(1)(a) GDPR)

4. Online Lesson Recordings

Online lessons may be recorded for educational purposes and quality assurance. Participants are informed in advance when recordings take place.

Retention periods:

- Short Courses: recordings are retained for 3 months after completion of the training.
- Category B (Cat B) Programme: recordings are retained for 1 year after completion of the training.

5. Online Proctoring and Examination Monitoring

For certain online examinations, Skilltrade uses professional proctoring services. This may include video recording, audio recording, screen monitoring, and identity verification. This processing is necessary to protect the integrity, fairness, and credibility of the examination process.

Proctoring recordings are retained for a period of 3 months following the examination date, unless a longer retention period is required in connection with dispute resolution or legal obligations.

6. Identity Verification

Where identification of training participants is required for an online examination conducted using proctoring technology, Skilltrade may request a copy of a passport or other official identity document solely for the purpose of verifying the participant's identity.

Participants are instructed to redact all non-essential information prior to submission, including document numbers, nationality, and machine-readable zones, unless such information is legally required. Only the participant's full name and photograph are necessary for identification.

The identity data will be used exclusively to verify identity and confirm eligibility to sit the examination and will not be processed for any other purpose. Proctoring recordings are stored securely and retained for a period of six (6) months after the examination date. This retention period allows Skilltrade to review examination integrity and to handle any complaints or disputes where necessary.

7. International Data Transfers

Skilltrade uses Microsoft 365 services (including SharePoint) and other carefully selected service providers. Where personal data is transferred outside the European Economic Area (EEA), such transfers are carried out in accordance with Chapter V GDPR and are subject to appropriate safeguards, including Standard Contractual Clauses (SCCs) or adequacy decisions adopted by the European Commission.

8. Data Retention

- Financial administration: 7 years (statutory obligation under Dutch tax law)
- Student and certification records: retained in accordance with accreditation and quality assurance requirements
- Lesson recordings: as specified in Section 4 of this policy
- Proctoring recordings: 6 months after the examination date
- Marketing data: until consent is withdrawn

9. Processors and Data Sharing

Skilltrade engages carefully selected processors, including Moodle (LMS provider), ProctorExam (online proctoring), Microsoft 365, payment service providers, and accounting service providers. Data Processing Agreements have been concluded with these processors in accordance with Article 28 GDPR.

10. Rights of Data Subjects

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to erasure ('right to be forgotten') (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)
- Right to object (Article 21 GDPR)
- Right to withdraw consent at any time (Article 7(3) GDPR)

Data subjects also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

11. Technical and Organisational Measures

Skilltrade implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including encrypted connections (SSL/TLS), role-based access controls, multi-factor authentication where applicable, logging and monitoring, and restricted access to personal data.

12. Amendments to this Policy

Skilltrade reserves the right to amend this Privacy Policy. Any changes will be published on the website with an updated revision date.