

PRIVACY NOTICE

Last updated: 29 April 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 your personal data described in this Privacy notice.

Contact details:

Email: office@skilltrade.nl

Phone: (+31) 20 3039804

2. What data we collect

We may process the following types of personal data:

- Contact details (name, email address, phone number, company)
- Payment and billing information
- Learning platform data (account details, activity, progress)
- Examination results and certifications
- Recordings of online lessons (if applicable)
- Proctoring data (video, audio, screen recordings, ID verification)
- Technical data (IP address, device information, log data)

3. How long do we keep your data

Online lessons and recordings

We may record online lessons for training and quality purposes. You will always be informed in advance.

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

Online Proctoring and Examination Monitoring

For certain online examinations, Skilltrade uses professional proctoring services. This includes 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 3 months, unless a longer period is required for dispute resolution or legal obligations

Payment and billing information

We are legally required to retain financial records for 7 years.

Student and certification records

Category B certification data is retained for up to 50 years, in accordance with International Hydrographic Organisation (IHO) requirements.

Marketing data

Your data is retained for marketing purposes until you unsubscribe or withdraw your consent.

4. Why we use your data

We process your data only when we have a valid legal basis:

- To deliver training and examinations (contract performance)
- To comply with legal obligations (e.g. tax and accounting laws)
- To protect exam integrity and prevent fraud (legitimate interest)
- To maintain IT security and improve services (legitimate interest)
- To send marketing communications (only with your consent)

5. 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.

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 three (3) 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. Your rights

- 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).

9. 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.

10. Changes to this notice

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