

DATA PROTECTION POLICY

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RED DUNE

Data Protection Policy

RED DUNE TRAINING CENTER

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RED DUNE TRAINING CENTRE

1. Purpose & Scope

This Data Protection Policy sets the principles, responsibilities, and boundaries that Red Dune Training Centre (Saudi Arabia) follows to protect personal data and assessment information. It exists to ensure lawful, fair, and transparent processing; safeguard confidentiality, integrity, and availability; and demonstrate compliance with Saudi PDPL and its implementing guidance, TVTC quality expectations, and our integrated management system based on ISO 9001 (quality), ISO 14001 (environment), and ISO 45001 (occupational health & safety).

The policy applies to all Red Dune locations, classrooms, offices, storage areas, and any temporary training or assessment venues under our control. It also covers our information assets and systems, including email, learning management systems, e-proctoring tools, assessment repositories, cloud storage, collaboration platforms, CCTV where installed, access control, portable media, and hard-copy archives.

People in scope include employees, contracted trainers, assessors, invigilators, internal quality assurers, agency staff, visitors, suppliers handling our data, and all learners and client representatives. The policy applies regardless of role, seniority, or employment status, and extends to third parties acting as processors on our behalf.

Data in scope includes any information that directly or indirectly identifies a person: registration and identity records, contact details, enrolment and attendance, assessment submissions and marks, feedback, reasonable adjustments and special considerations, incident and appeal files, finance and payment details, HR and payroll records, medical or emergency information collected for safety or welfare, and audit evidence required by awarding bodies or TVTC.

Processing in scope includes collection, recording, storage, use, transmission, sharing, retention, archiving, and secure destruction. It applies to paper and electronic formats, routine operations and emergencies, on-premise and cloud, and local or cross-border transfers permitted by law and contractual obligations.

Where legal, contractual, or awarding-body requirements impose stricter controls, those take precedence. Detailed procedures and role-specific instructions (e.g., DPIA, consent, subject-access, breach response, records retention) sit beneath this policy and must be followed by everyone in scope.

2. Compliance Framework

Red Dune Training Centre's Data Protection Policy is anchored in the Kingdom of Saudi Arabia's **Personal Data Protection Law (PDPL)** and its implementing regulations, supported by **SDAIA** guidance. We recognize our role as a data controller and, where applicable, data processor. Accordingly, we commit to lawful, fair, and transparent processing; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality; and demonstrable accountability. We maintain Records of Processing Activities, identify lawful bases (e.g., contract, legal obligation, vital interests, consent), honor data-subject rights (access, correction, deletion, restriction/objection, and portability where applicable), and apply **privacy by design** through risk-based **DPIAs** for higher-risk operations (e.g., online proctoring, CCTV).

For **TVTC** programmes and interactions with international HSE awarding bodies, we protect learner and assessment data consistent with TVTC privacy expectations and awarding-body requirements. This includes secure handling of applications, identity/attendance records, assessment evidence, invigilation/proctoring materials, results, appeals/remarks, and certification data. We ensure third-party processors (e.g., LMS, e-assessment, cloud hosting, printing/courier services) operate under written agreements with appropriate technical and organizational measures and verified sub-processor controls.

The policy is integrated with our management systems:

- **ISO 9001 (QMS):** competence and awareness (7.2), documented information control (7.5), operational planning and control (8.1), performance evaluation (9.1–9.3), and continual improvement (10).
- **ISO 14001 (EMS):** compliance obligations and operational control for data-handling activities with environmental aspects (e.g., secure destruction, e-waste).
- **ISO 45001 (OH&S):** worker participation, consultation, and safe working conditions for data processing areas (e.g., screen privacy, secure visitor management).

We operate incident and breach procedures for prompt containment, investigation, documentation, and notification to competent authorities and affected individuals as required. Governance is provided by the Head of Centre, with a designated Data Protection Lead overseeing compliance, audits, KPIs, training/CPD, and the annual management review.

3. Definitions

Personal Data: Any information that identifies or can reasonably identify a natural person (e.g., name, ID/iqama, contact details, photos, CCTV images, assessment records, attendance, signatures).

Sensitive/Health Data: Personal data that requires enhanced protection, such as health information, disability or fitness-for-training notes, biometric or genetic data gathered for identity or assessment integrity.

Data Subject: The individual to whom the personal data relates (learners, applicants, staff, tutors/assessors, visitors, clients' delegates).

Controller: The party that determines the purposes and means of processing personal data. *Red Dune Training Centre* acts as controller for learner and staff records.

Processor: A party that processes personal data on behalf of the controller under a written contract (e.g., e-learning platforms, e-proctoring or SMS providers).

Processing: Any operation performed on personal data—collection, recording, organizing, storing, adapting, using, sharing, transmitting, restricting, erasing, or destroying—whether automated or manual.

Anonymization: An irreversible technique that removes identifiers so individuals can no longer be identified by Red Dune or any other party likely to access the dataset.

Pseudonymization: Replacing identifiers with codes so data cannot be linked to an individual without separate, securely stored key information.

Lawful Basis: A valid reason to process personal data (e.g., consent; contract; legal or regulatory obligation; protection of vital interests; legitimate educational/operational interests where permitted).

Consent: A clear, specific, informed, and freely given indication by the data subject (or guardian where applicable) that they agree to processing; consent can be withdrawn.

Third Party/Recipient: Any external body to whom data is disclosed (e.g., awarding bodies, TVTC, auditors) under a lawful basis and appropriate safeguards.

Breach: A security failure leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

Data Minimization: Limiting collection and use to what is necessary for stated purposes.

Retention: Keeping data only for defined periods, then securely deleting or anonymizing it.

Cross-Border Transfer: Moving personal data outside KSA under approved transfer mechanisms and safeguards.

4. Lawful Bases for Processing

Red Dune Training Centre processes personal data only when a valid lawful basis applies. We select the narrowest appropriate basis for each activity and record it in our Register of Processing.

1) Consent

We obtain freely given, specific, informed, and unambiguous consent where processing is optional or not strictly necessary for learning or compliance. Typical examples: marketing communications, use of learner photos in publicity, optional satisfaction surveys, and certain proctoring/recordings beyond what is strictly required. Consent is collected per purpose, can be withdrawn at any time, and withdrawal does not affect prior lawful use. **Explicit consent** is required for high-risk or sensitive processing, such as health/medical disclosures, biometric identifiers, or special assistance details, unless another lawful basis clearly applies and is permitted by law. For minors, consent is taken from the parent/guardian where required.

2) Contract

We process data when it is necessary to enter or perform a contract with a learner, client, supplier, or staff member. Examples include course registration, identity verification, training delivery, assessment scheduling, e-learning account creation, exam booking, certificate issuance, and sharing mandatory achievement data with awarding bodies. If processing is not truly necessary for the contract, we will rely on another basis (often consent) or not process.

3) Legal Obligation

Where laws or regulators require us to process or retain data, we will do so strictly to the extent necessary. Examples include: TVTC reporting, exam security and record retention, health and safety/incident reporting, finance and taxation records, and compliance audits. Retention periods and disclosures follow documented legal and regulatory requirements.

4) Vital Interests

We may process or share limited personal data to protect life or prevent serious harm—for example, contacting emergency services, disclosing known allergies/medical alerts to first responders, or conducting urgent safety communications during an incident.

Principles Applied

We avoid relying on consent where a clearer basis exists; we minimize data collected; we provide clear notices; and we document the chosen basis, retention, recipients, and safeguards for each processing activity.

RED DUNE TRAINING CENTRE

5. Data Categories & Sources

Red Dune Training Centre collects only the minimum data needed to deliver training, assessment, certification, and centre operations. Data is obtained directly from data subjects (learners, staff, visitors), generated through our processes, or received from approved third parties (e.g., employers, awarding bodies, TVTC).

Learner Records

- Identification and contact details, nationality, date of birth, sponsorship/employer, prior learning, and course enrolment data.
- Sources: application forms, identity checks, employer nominations, online portals.
- Use: enrolment, funding/sponsorship verification, attendance, results, certification, learner support.

Assessments

- Assessment scripts, practical checklists, video/audio evidence where required, grades, feedback, reasonable adjustments/special consideration records, appeals/remark logs.
- Sources: invigilated exams, practical assessments, e-proctoring systems, assessor observations.
- Use: awarding decisions, quality assurance, regulatory reporting, standardisation.

Attendance & CCTV

- Registers, sign-ins, access logs, time stamps; CCTV images covering entrances, classrooms, and exam areas.
- Sources: reception logs, LMS/attendance apps, access control, CCTV equipment.
- Use: safety and security, exam integrity, incident investigation, compliance with centre rules.

Supplier & Partner Data

- Company contacts, contracts, service performance, and due-diligence documentation.
- Sources: suppliers, awarding bodies, TVTC interfaces.
- Use: service delivery, audit and compliance.

Retention & Accuracy

Each category follows an approved retention schedule. Records are reviewed for accuracy, securely destroyed at end-of-life, and access is role-based under our Document Control procedure.

6. Records of Processing (ROPA)

Red Dune Training Centre maintains an up-to-date Record of Processing Activities (ROPA) so we can evidence compliance, respond to data-subject requests, and manage risks across all programmes (international HSE and TVTC).

Ownership & Format

The Head of Centre owns the register; the Data Protection Lead maintains it. The ROPA is a controlled spreadsheet/database with version control and read-only access for staff who need it.

Minimum Fields Captured (one row per activity)

- **Activity name** (e.g., Learner Enrollment; Assessment & Invigilation; E-learning Platform; HR/Staffing)
- **Purpose** (what we aim to achieve)
- **Lawful basis** (e.g., contract, legal obligation, consent, vital interests) and whether **explicit consent** is required
- **Data categories** (IDs, contact details, qualification history, assessment evidence, medical/fitness notes where applicable)
- **Data subjects** (learners, staff, visitors, contractors)
- **Recipients/Disclosures** (awarding bodies, TVTC, proctoring vendors, insurance, auditors)
- **International transfers** (country/transfer tool, if any)
- **Retention period** and disposal method (secure deletion/anonymisation; destruction certificates for paper)
- **Security measures** (access controls, encryption, segregation, exam-security controls, CCTV restrictions)
- **Special category handling** (e.g., health data safeguards)
- **DPIA required?** (Yes/No + link to DPIA)
- **System/location** (platform name, server region, physical archive)
- **Process owner** and **last review date**

Examples of Typical Entries

1. **Assessment & Invigilation** – Purpose: awarding credit fairly; Basis: contract/legal obligation; Recipients: awarding body/TVTC; Retention: scripts/evidence per qualification rules; Security: sealed storage, restricted e-folders, proctoring controls.
2. **Learner Support & Reasonable Adjustments** – Basis: consent/vital interests/legal obligation; Special category data safeguarded; Retention: minimum necessary, time-bound.
3. **CCTV for Safety & Integrity** – Purpose: safety and exam integrity; Basis: legitimate interests/legal obligations; Retention: short, auto-delete; Security: role-based viewing only.

Operation & Review

The register is reviewed termly and after any change (new system, vendor, or assessment method). Audits sample ROPA rows for accuracy, with corrective actions tracked to closure.

7. Data Subject Rights

Red Dune Training Centre respects data subjects' rights and processes requests lawfully, fairly, and within statutory timeframes. These rights apply to learners, staff, visitors, and clients whose personal data we process.

How to Request

Submit requests via support@reddune.org or complaints@reddune.org with: full name, course or relationship to Red Dune, contact details, and a clear description of the right you wish to exercise. We acknowledge receipt promptly and guide you if clarification is required.

Verification

We verify identity before acting (e.g., official ID match or known contact checks). Where a representative acts for you, we require proof of authority. Verification protects your privacy and exam security.

Inform (Transparency)

We provide concise privacy information at enrolment and prior to high-impact processing (e.g., e-proctoring/CCTV). Material changes are communicated in plain language.

Access & Copy

You may obtain confirmation we process your data and receive a copy in a commonly used format. We will redact third-party information and exam materials where disclosure would compromise assessment integrity or legal obligations, explaining any redactions.

Correction (Rectification)

You may request correction of inaccurate or incomplete data. We update records and notify relevant third parties (e.g., awarding bodies) where feasible.

Deletion (Erasure)

You may request deletion when data are no longer needed, consent is withdrawn (where consent is the lawful basis), or processing is unlawful. We may refuse or defer deletion where retention is required by law, TVTC/awarding-body rules, finance, audit, or litigation.

Restriction

You may request that we limit processing while accuracy, legality, or an objection is being assessed; we mark the records "restricted" and resume only when lawful to do so.

Objection

You may object to processing based on legitimate interests or direct marketing; we will stop unless we demonstrate compelling legitimate grounds or legal necessity.

Timeframes, Fees & Records

We respond within applicable legal deadlines. Extensions are used only where permitted and communicated in advance. Requests are free unless manifestly unfounded/excessive. We keep an auditable log of requests, decisions, and outcomes.

8. Consent Management

To ensure consent is obtained, recorded, withdrawn, and refreshed in a manner that is informed, freely given, specific, and unambiguous—supporting Red Dune Training Centre’s compliance framework and TVTC and awarding bodies expectations.

When we rely on consent

We use consent only where it is the most appropriate lawful basis—for example:

- Marketing communications and newsletters.
- Use of learner images, testimonials, or recordings for publicity.
- Certain health or accessibility disclosures not required by law but requested to tailor support.
- Proctoring features beyond strictly necessary settings.

Consent is **not** used where processing is required by contract, law, legitimate interests with minimal privacy impact, or assessment security obligations.

Obtaining consent

- Plain-language notices in Arabic and English, separate from terms and conditions, with a clear affirmative opt-in (no pre-ticked boxes).
- Specific choices for distinct purposes (e.g., marketing vs. photography).
- Accessibility: alternative formats and assistance on request.
- For practical activities, we explain any HSE-related monitoring that might capture personal data and provide an opt-in when appropriate.

Recording consent

We maintain a Consent Register linked to our Records of Processing: data subject identity (or unique ID), purpose(s), notice version, date/time, method, and proofs (e.g., signed form, portal log). Only current, approved consent forms may be used; version control is managed through Document Control.

Withdrawing consent

Withdrawal is as easy as giving it. Learners can opt out via portal forms, course admin, or email (e.g., info@reddune.org). We action withdrawals without undue delay, update systems, and confirm to the requester. Processing already completed remains lawful, but future use stops.

Refreshing consent

We refresh consent when the purpose changes materially, technology changes meaningfully (e.g., new proctoring tool), or after extended durations. Long programmes trigger an annual check-in.

Parental consent

For learners **under 18**, we verify age and obtain guardian consent. We record guardian identity and relationship, provide dual notices, and re-seek the learner’s own consent upon reaching majority.

Retention

Consent records are retained per our retention schedule and reviewed during internal audits and management review for continual improvement.

9. TVTC & Awarding-Body Interfaces

To manage audits and information requests from TVTC and awarding bodies in a lawful, secure, and efficient manner, protecting personal data while demonstrating compliance.

Scope

Applies to all programmes delivered by Red Dune Training Centre (Saudi Arabia), including international HSE qualifications and TVTC-approved courses, and to any staff preparing or transmitting evidence.

Principles

- Share **only what is necessary** for the stated audit purpose (data minimization).
- Use an identified **lawful basis** (e.g., legal obligation/contract) before disclosure.
- Maintain **confidentiality, integrity, and availability** through approved controls.

Requests Handling

1. Verify the requester's identity and mandate.
2. Log the request, scope, legal basis, and deadlines in the Audit/Request Register.
3. Assign an owner: **Head of Centre** (accountable) and **Quality Lead/IQA** (coordinator).
4. Confirm the secure transfer method before sending any data.
5. Record exactly what was shared, when, to whom, and retention instructions received.

Evidence Packs

Evidence packs may include sampling plans, mark schemes, anonymized learner work, assessor/IQA records, invigilation logs, and outcomes of appeals/malpractice investigations. Where possible, **anonymize or pseudonymize** learner data; if identification is required, limit exposure to the minimal fields.

Security & Transfer

- Use Centre-approved encrypted repositories or password-protected archives with out-of-band password sharing.
- Do not use personal emails or unapproved cloud tools.
- Apply access controls (least privilege) and watermark confidential files.

Retention & Disposal

Follow the Records Retention Schedule or the awarding body/TVTC instruction—whichever is stricter. Securely destroy temporary working files after completion.

Cross-Border Transfers

If an awarding body is outside KSA, complete a transfer risk check and use an approved transfer mechanism before disclosure.

Contact

All audit communications pass through exam@reddune.org (operational) and info@reddune.org (general), under oversight of the Head of Centre.

10. Special Rules for Assessment Data

These rules apply to all assessment data created or received by Red Dune Training Centre (Saudi Arabia), including written papers, scripts, answer sheets, mark records, seating plans, invigilation logs, incident forms, remote-proctoring audio/video, and evidence used for appeals or remarking.

Collection & lawful use

We collect only what is necessary to set, sit, mark, verify, and certify assessments, and to investigate irregularities or appeals. Use is limited to these purposes and to meeting awarding-body, TVTC, and legal obligations.

Exam security

Assessment materials are controlled documents. Physical items are sealed, serialised, and stored in locked cabinets; digital files are encrypted with role-based access and multi-factor authentication. Personal devices are prohibited in secure rooms. Movement of materials follows a recorded chain-of-custody.

Invigilation records

Invigilators keep timed logs (open/close, identity checks, incidents, allocations of extra time) and complete incident reports where needed. Access is restricted to the Exam Officer, Quality Lead/IQA, Head of Centre, authorised auditors, TVTC, and awarding bodies.

Appeals/remarking evidence

All evidence (scripts, logs, CCTV/proctoring clips, correspondence) is compiled into a single evidence pack, sealed and indexed. Retention is extended until the final decision, after which data is culled to the minimum needed for audit.

Proctoring footage

Remote-proctoring captures screen, camera, audio, and system events strictly for identity, integrity, and misconduct detection. Automated flags never replace human judgement. Storage is encrypted; retention is short and proportionate, unless paused for investigations or appeals, then securely deleted.

Data sharing & rights

We share assessment data only with processors under contract, awarding bodies, regulators, or TVTC when required. Identity-verified access/correction requests are honoured unless disclosure would compromise assessment integrity; where limits apply, we provide the lawful rationale.

11. Documented Information Control

To ensure all data-protection documents at Red Dune Training Centre (Saudi Arabia) are accurate, current, and available, while obsolete copies are removed from use.

Ownership & Identification

Each controlled document (policy, SOP, form, register) has unique ID, title, owner (Data Protection Lead), approver (Head of Centre), version number, date, status (Draft/Approved/Obsolete), and next review date.

Versioning & Approval

Changes are proposed via change request, impact-assessed, and logged in a change history. The Quality Lead verifies format and references; the Head of Centre approves. Approved versions are published to the QMS document portal with “CURRENT” status; superseded copies are watermarked “OBSOLETE.”

Distribution & Access

Only the latest version is visible to staff through links. Access controls restrict editing to the owner and Quality Lead. External sharing (e.g., TVTC or awarding-body audits) uses controlled PDFs with version metadata.

Withdrawal of Obsolete Copies

On approval of a new version, the system:

1. replaces links in course folders and assessment packs.
 2. archives the previous version in a read-only “Obsolete” library; and
 3. posts a bulletin noting key changes and required actions.
- Printed copies are stamped “OBSOLETE” and removed from circulation; emergency hard copies are numbered and logged.

Records & Retention

Version registers, approval logs, and distribution lists are retained per the Records Schedule.

Assurance & Review

Audits sample documents for accuracy, access, and withdrawal effectiveness. Nonconformities trigger corrective action. This control supports PDPL compliance and TVTC expectations and is reviewed at least annually or after incidents/changes.