

SCS College Online Privacy/Cyber security statement.

1.0 Legal Framework for SCS College Online (abbreviated LMS) :

Depending on the type of certificate and related legislation, regulations or sector rules, there is a legitimate interest, purpose limitation, minimum data processing, accuracy, storage limitation and accountability. Measures have been taken for this in the LMS.

This statement focuses primarily on Civil Aviation Security (BBLV) legislation and ADR/ IATA hazardous materials regulations.

The LMS is used by trainers as SCS Training & Consultancy B.V. for registration, archiving and making training available. The customers of these trainers use the LMS for training by their employees.

1.1 With regard to the BBLV training courses and the accreditation of SCS Training & Consultancy B.V. as a recognized training institute, we have a legal obligation (EU 2015/1998, Aviation Act + National Civil Aviation Security Program) to register and archive data for certificates provided by SCS or for certificates provided to us by third parties to access training courses in the LMS.

In addition, there is a legal obligation for SCS Training & Consultancy to determine, prior to the start of a training course, whether the trainee has completed a standard background check (part of which is the VOG) or an extensive background check (part of which is the VGB) on behalf of the current employer and whether its validity has not been exceeded.

This determination of a valid screening certificate VOG/VGB will be:

- A) done by the instructor in classroom training or
- B) by an automated validation tool in the LMS when repeating e-learning or a new VOG or VGB.

Of these documents, only the issue date of a screening document such as VOG or VGB is recorded in the LMS. The document itself is not saved.

Each student can use his login in the LMS to view the recording of his personal information (GDPR requirement).

The instructor will check name, date of birth using valid ID proof before the start of the classroom training and compare it with the data in the LMS and, if necessary, have it corrected or refuse the student for the training.

In case of registration in the LMS of a student for e-learning refresher training, the LMS automatically checks the expiration date of the VOG/VGB and the current/valid certificate.

Both the employer and SCS Training & Consultancy have an archiving obligation. This expires the moment the employment relationship between employer and student is terminated. In the LMS, the employer must indicate that the account containing a student's data and certificates must be deleted.

1.2 With respect to ADR and IATA, there is an archiving requirement of certificates for the employer. For ADR, the employer must file during employment. For IATA, the employer must also archive for 36 months after termination of employment.

The LMS facilitates the employer in this regard. The employer bears responsibility for this and must indicate in the LMS whether the account containing a student's data and certificates is to be deleted.

1.3 Minimal data processing

Data elements captured in the LMS for each student :

Course	Name	Date of birth	Email address	VOG/VGB issue/expiry date
All BBLV courses	V	V	V	V
ADR driver	V	V	V	
Other courses	V	V*	V	
*no control by teacher or by LMS				

Because employers put personally identifiable information on the LMS, the LMS must comply with AVG/GDPR legislation and implement Cybersecurity security measures to prevent a data leak of "personally identifiable information."

2.0 Security measures in the LMS:

2.1 Access control LMS internal SCS:

- Passwords for all users, user configurable
- Multi Factor Authentication (MFA) mandatory for all SCS employees (including outside teachers) using the LMS
- All SCS employees with access to the LMS have undergone at least a VOG screening.
- All SCS Training & Consultancy instructors have undergone at least a VGB screening.
- Access rights are granted on a need-to-know basis
- Access rights are removed through an off boarding procedure or as needed.

2.2 Access control for employers who disclose their trainees within the LMS:

- An employer can use a 'manager account' to register students for training in the LMS. A manager account can be used to get an overview of only the own trainees within the assigned organization.
- Learner access rights can be blocked or removed by the employer. For removal, a request is made to the LMS.
- A student can access his/her information. This is handled through the managers account. A student can only request blocking or deletion from the managers account.
- Passwords for all users, user configurable
- Access rights distribution by user group
- Multi Factor Authentication (MFA) is optional for customers using the LMS. Optional for Managers account and/or students.
- Trainees (dates) visible only to the respective company's manager account
- Student sees only their own data

2.3 security LMS servers

- SSH (Secure Shell)
- Firewall
- VPC (Virtual Private Cloud): completely isolated from other enterprise systems
- Automatic server updates
- Daily backups
- Strong passwords strength indicator for user
- Multi server environment (web service and databases are on separate servers)
- Server hosting within the EU

3.0 sharing information

SCS College Online shares personal data with third parties on a limited basis:

- An external instructor can only view the details of the course he/she is to teach. All instructors have a Certificate of No Objection, requested by SCS and (the BBLV instructors) a review by order of the National Coordinator of Terrorism and Security which is conducted by the supervisor (Royal Military Police).
- External programmers have a certificate of good conduct and a processing agreement with SCS
- The competent (governmental) authority may have access if demanded.

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