

MODULE SIX LTD

Privacy Notice

What Module Six Ltd does with personal data, across every product it operates

This notice explains what **Module Six Ltd** does with personal data. It covers **Calibrate, Educate, Activate, Validate** and **Candidate**, and membership of the Institute of Project Professionals, whether you are an individual using one of them, a member, an employee of a customer, a worker recorded on an employer's register, or a recruiter using the talent window.

*This notice sits above two others rather than replacing them. **IPP-DAT-001** covers Institute membership in detail, and **MS-DAT-002** is the contract governing an employer's Authority to Work register. Where any of them describes the controller, our suppliers, retention or your rights, **this notice is the one that governs** and the others point here.*

1. Who we are

Module Six Ltd is the data controller, except where section 2 says otherwise. We are registered in England and Wales under company number **17311940**. Our registered office is Henge Barn, Pury Hill Business Park, Alderton Road, Towcester, Northamptonshire, NN12 7LS. We are registered with the Information Commissioner's Office under reference **ZC198668**.

The **Institute of Project Professionals** is a professional body we operate. It is **not a separate legal entity**. Where an Institute document says the Institute decides something, it means Module Six Ltd acting as the Institute, and Module Six Ltd is answerable for it. There is one controller behind everything described here, and it is us.

2. The one place where we are not the controller

Validate is different, and it is the only exception. An employer uses Validate to hold an **Authority to Work register**: a record of which of their workers hold which competencies, what each is cleared to do, and the evidence behind it. Those are the employer's records about the employer's workforce, gathered for the employer's purposes.

For those records the **employer is the controller and Module Six Ltd is the processor**. We act on the employer's written instructions and not on our own judgement. The terms are set out in **MS-DAT-002**, published at modulesix.co.uk/dpa.

Two consequences are worth stating plainly, because they surprise people. Most individuals on a register hold no account with us and have never dealt with us; telling them their data is held is the employer's duty. And if you want your register record changed or removed, you ask your employer, not us: we will show you everything we hold and pass your request on, but we will not delete an employer's evidence that its people were qualified to do the work they did on the instruction of somebody who is not their controller.

3. What we publish about you, and what you control

Most of what we hold is private to you and to the people you work with. Three things are different, because their whole purpose is to be seen, and all three are yours to switch off.

- **The public register of members.** If you hold a membership grade, your name, grade, designation and status appear in a register anybody can search. That is how a professional credential works: it is worth nothing if it cannot be checked. It is on by default under our legitimate interest in operating a credible register, and **you can switch it off**.
- **Your profile.** Job title, employer, location, biography and LinkedIn are **off until you switch them on**, and they are on the separate basis of your consent. Turning your register listing off takes the profile with it.

- **Your passport and the talent window.** You may publish a passport of your validated competencies and verified outcomes at a link you share, and you may choose to be visible to **recruiters and agencies** who subscribe to search for people with those competencies. Both are off unless you turn them on. A passport is read live, so withdrawing it takes effect immediately rather than when a cached copy expires.

Where an outcome you claim names somebody else — a sponsor, a client organisation, a project — the person who confirms it is told what they are confirming, and their confirmation is recorded against your record with their name and the date. They may withdraw it. Editing a confirmed claim removes the confirmation, because it was given for what the claim said at the time.

*The detail of what appears on each public surface, field by field, and the basis for each, is in **IPP-DAT-002**. This section is the summary; that document governs.*

4. What we hold, and why we are allowed to

What	Why we hold it	Our lawful basis
Account and identity: name, email address, sign-in credentials	So you can have an account and we know who you are	Contract
Membership records: grade, member number, applications, conduct and governance matters	To operate a professional body and its register	Contract, and legitimate interests for conduct matters
Assessment records: examinations, sittings, results, competence assessments, CPD	To award and maintain a credential that means something	Contract
Commercial records: orders, invoices, billing address, consents to terms	To take payment and to show what was agreed	Contract, and legal obligation for accounting records
Authority to Work registers	Held for an employer, on that employer's instructions	The employer decides. See section 2
Published record: register entry, passport, talent window availability	So that a credential can be checked, and so that a member who wants to be found can be	Legitimate interests for the register entry; consent for the profile, the passport and the talent window. See section 3
Outcome claims and their confirmations	So that a claim about work somebody did can be verified rather than taken on trust	Contract with the member; legitimate interests as regards the person confirming it
Accountability records: audit log, consent records, requests you make of us	To show that we did what this notice says	Legal obligation and legitimate interests

The detail of what the Institute holds about a member, including the public register and what is published in it, is in **IPP-DAT-001**.

5. Who else sees it

Four suppliers process personal data **on our behalf**. Each is bound by a written agreement, acts only on our instructions, may not use your data for its own purposes, and is listed here with the

safeguard we rely on where data leaves the United Kingdom. **No other party processes personal data on our behalf**, and we sell nothing, share nothing with advertisers or data brokers, and run no tracking service.

*That is a different question from who your information reaches. Where you publish a Passport, appear in the public register, make yourself visible to recruiters, or where your employer holds a register you are on, your information reaches people who are not our suppliers and who are **not acting on our instructions**. They answer for what they do with it on their own account. Section 3 sets out what is published and what you control; section 2 covers an employer's register.*

Supplier	What they do	Transfer safeguard
Cloudflare, Inc.	Hosting, application platform, database and file storage. Receives everything	Standard Contractual Clauses with the UK Addendum
Clerk, Inc.	Accounts and sign-in. Receives identity	UK Addendum at Schedule 5 of their data processing agreement, alongside Standard Contractual Clauses
Plus Five Five, Inc., trading as Resend	Sending our email. Receives recipient addresses and message content	UK Extension and Standard Contractual Clauses under their data processing agreement
Stripe, Inc.	Taking payment. Receives billing identity and payment records	Standard Contractual Clauses with the UK Addendum

Stripe has two roles and it matters which is which. When it takes a payment on our instruction it is our processor and this notice governs it. When it decides how to detect fraud, how to meet its own anti-money-laundering and identity obligations, and how to manage its own relationship with you, it is a controller in its own right. For that part Stripe's own privacy policy applies alongside this one and you exercise your rights against Stripe. We cannot instruct them out of obligations they carry directly.

We will tell an employer before we add or replace any supplier that processes their register data. The suppliers who do so are Cloudflare, Clerk and Resend; Stripe is not one of them, because an employer's payment to us is a contract between us and them rather than data we process on their behalf.

6. How long we keep it

The following periods apply across every product we operate.

Record	How long
Accountability records: audit log, consent records, requests you make of us	Six years
Commercial records: orders, invoices, payments	Six years from the end of the financial year they fall in
Conduct and governance matters	Six years from the date the matter is closed
Membership, assessment and competence records	For as long as the account exists. These are the record of a credential and are not deleted while you hold it
Authority to Work register data	The employer decides. We publish no period of our own. See section 2

We hold encrypted backups so that we can recover from a failure. Daily backups are deleted after 30 days and weekly backups after 365 days. **An erasure does not reach into a backup**, so for a short period after we erase you a copy may remain in one until it expires on the schedule above. We do not restore a backup to bring erased data back.

7. Your rights

You can ask us to do any of the following, and it is free:

- **See what we hold about you**, and get a copy of it.
- **Correct it** if it is wrong or incomplete.
- **Erase it**, where we do not have to keep it for one of the reasons in section 5.
- **Take it elsewhere**, in a structured, commonly used and machine-readable form.
- **Restrict what we do with it**, while a dispute about it is resolved.
- **Object to what we do with it**, where we rely on legitimate interests.
- **Withdraw a consent** you gave us, without affecting anything done before you withdrew it.

We answer within **one month**. If a request is complex we may take longer, and if we do we will tell you inside that month, why, and when to expect an answer.

Two limits, stated so they are not a surprise. Where a record is the basis of somebody else's entitlement we may **anonymise** it rather than delete it, so that the other person does not lose something they hold. And for an Authority to Work register we act on the employer's instruction and not yours, as section 2 explains.

8. Getting in touch, and complaining

For anything in this notice, including a request under section 6, write to **data@modulesix.co.uk**. It reaches a person.

If you are unhappy with how we have handled your personal data you can complain to us and we would rather you did, because we can usually fix it. You can also complain to the **Information Commissioner's Office** at ico.org.uk, or on 0303 123 1113, and you do not have to come to us first.

A complaint about the Institute, its decisions or its members is a different route and is set out in **IPP-GOV-006**.

9. Changes to this notice

This notice carries an issue number and a date. When it changes materially we issue a new version and, where the change affects an agreement you have with us, we tell you. Superseded issues are kept, so it is always possible to establish what this notice said on a given date.

Issue 1, 25 August 2026. This notice does not replace the Institute's own privacy notice at ipp.pro/privacy, which continues in force and covers membership in detail. Where the two address the same matter, this notice governs.