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Privacy Policy – Professional Role Players Ltd (PRP)

1. Introduction

Professional Role Players Ltd ("PRP", "we", "us", or "our") respects your privacy and is committed to protecting the personal data of all users including website visitors, clients, role players, examiners, invigilators, and users of our digital platform, Osler Online. This Privacy Policy outlines how we collect, use, store, and protect your information in accordance with the UK GDPR, the Data Protection Act 2018, and industry best practices.

We view the correct and lawful handling of personal information with our third parties. We shall ensure that all personal information is handled correctly, lawfully and in compliance with GDPR.

2. Who We Are

PRP Ltd is a limited company registered in England and Wales (Company No. 03353713). We specialise in communication training, assessments, and education using professional role players across the UK and internationally via our bespoke online platform, Osler Online.

- **Registered Office:** 87 Firs Park Avenue, Winchmore Hill, London, N21 2PU
- **Trading Address:** 101 St Marks Road, Bush Hill Park, Enfield, EN1 1BJ
- **Data Protection Owner:** Danielle Squire
- **Contact:** danielle@prplayers.co.uk | 020 8342 0099

3. Scope

This policy applies to:

- Users of our website (www.prplayers.co.uk and www.osleronline.co.uk)
- Applicants submitting forms through our site (e.g., actors' application form, booking enquiries)
- Self-employed role players ("actors") contracted by PRP
- Clients using our Osler Online platform and candidates, examiners, role players, chaperones, observers, they provide.



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4. What Personal Data We Collect

Candidates:

- Name, contact information and unique candidate ID
- Assessment session data including time-stamped participation records
- Audio and video recordings during assessments (where consent is provided)
- Marking, feedback, and examination results
- Accessibility needs and requested adjustments
- Login and usage information on Osler Online

Depending on your relationship with PRP, we may collect the following data:

Website Users:

- Contact details (name, username, email address, telephone numbers)
- Technical and usage data (IP address, browser type, cookies, analytics)
- Preferences (marketing and communication preferences)
- Location of residence
- Gender
- Ethnicity
- ID Reference numbers

Role Players and Invigilators:

- Identity and contact information (self-employed actors and invigilators)
- Identity and contact information
- Professional qualifications and credentials
- Session data and marking input (where relevant)
- Audio/video contributions (where applicable for remote exams)
- Feedback or performance notes (where applicable)

Clients & Osler Online Users:

- Contact details of clients and assessors provided by the client
- Login credentials and usage data on Osler
- Video and audio recordings during assessments (where consent is provided)
- Technical information (device data, accessibility features used)



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5. How We Use Your Data

We use your personal data to:

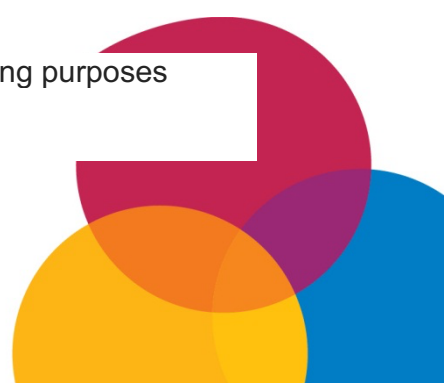
- Provide, operate, maintain, and improve our website and Osler Online service(s)
- Facilitate efficient transactions with third parties including, but not limited to, our customers, partners, associates, and efficiently manage our employees, contractors, agents, and consultants
- Meet any and all relevant obligations imposed by law
- Provide role players and invigilators for client bookings
- Administer candidate assessments, including managing results, validation, and appeals
- Coordinate and manage role players and invigilators supplied by PRP
- Communicate with clients and the examiners and candidates they supply
- Improve our website and digital platforms
- Comply with legal and contractual obligations
- Ensure accessibility and inclusivity in all services
- Automatically process and segment assessment materials (e.g., PDF slicing) for digital delivery and confidentiality assurance within Osler workflows

Lawful Reasons for Sharing Personal Data

We may share your personal information with trusted third parties and service providers where one or more of the following lawful bases apply:

- **Contractual obligation** – where sharing is necessary to fulfil a contract with you or a third party
- **Legal obligation** – where we are required to comply with legal or regulatory obligations
- **Legitimate interests** – where sharing is necessary for our legitimate business interests, and those interests are not overridden by your data protection rights
- **Consent** – where you have provided clear, explicit consent for us to do so
- **Vital interests** – in rare circumstances, where sharing is necessary to protect someone's life or safety
- **Public task** – where processing is necessary for us to carry out a task in the public interest

We will never share your personal data with any third party for marketing purposes without your explicit consent.



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6. Special Category and Sensitive Data

We collect and process special category data where necessary (e.g., ethnicity for casting; health conditions for accessibility). Explicit consent will be obtained prior to processing, and all data is handled securely and confidentially.

7. Data Security

We apply robust physical, technical, and organizational measures to protect your data, including:

- ISO 27001-compliant processes
- AES-256 encryption for sensitive files
- MIMECAST secure file sharing
- Password-protected access (16+ character requirement)
- Access controls and activity logs
- Cyber Essentials Plus certified infrastructure

8. Third Party Processing

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

9. International Data Transfers

Data may be accessed or transferred internationally to deliver global assessments via the Osler Online suite. In some cases, this may include the routing of video and audio signalling through servers located in the United States. These transfers are necessary for platform functionality and real-time communication between assessment participants.

We ensure that all such transfers are protected by appropriate safeguards, including the use of Standard Contractual Clauses (SCCs), secure encryption, and compliance with UK GDPR standards. No data is stored permanently outside the UK or EEA unless such storage is protected by equivalent or higher data protection standards.



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10. Data Retention

We retain personal data only as long as necessary to fulfil the purpose it was collected for, including legal, accounting, and reporting requirements. Scenario recordings and assessment data are securely deleted after agreed retention periods.

11. Your Data Protection Rights

Under UK GDPR, you have the right to:

- Be informed about how your data is used
- Access your personal data
- Request correction of inaccurate or incomplete data
- Request erasure ('right to be forgotten')
- Restrict or object to processing
- Withdraw consent at any time
- Request data portability
- Lodge a complaint with the ICO (www.ico.org.uk)

12. Role Players, Examiners, Invigilators, Candidates, and Osler Online

Our services involve role players and invigilators (including self-employed actors and contracted personnel). Our clients supply candidates and examiners who operate across both face-to-face and digital formats. Osler Online enables virtual assessments for candidates, role players, invigilators, and examiners, where:

- Audio/video may be recorded for exam validation (with consent)
- Users benefit from accessibility tools (captioning, font scaling, contrast modes)
- Personal data is stored securely with limited access
- Geographical and physical barriers are removed to enable global access

PRP uses Osler Assistant for digital marking and real-time candidate evaluation and results processing. These tools are designed to minimise paper usage and support sustainability. Examiners and invigilators using Osler platforms are expected to comply with confidentiality, integrity, and conduct policies.

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13. Cookies

We use cookies for analytics, platform performance, and user preferences. You can adjust cookie settings in your browser. For more details, see our [Cookie Policy](#).

14. How to Contact Us

If you have questions about this policy, would like to update your personal data, or wish to exercise your rights, please contact our Data Protection Lead:

Danielle Squire

Email: danielle@prplayers.co.uk

Phone: 020 8342 0099

Post: 101 St Marks Road, Bush Hill Park, Enfield, EN1 1BJ

This policy may be updated occasionally to reflect changes to our operations, legal requirements, or technologies used. Any significant updates will be posted on our website with the effective date clearly marked.