

Privacy Notice: Learning Management System

The Civil Service College respects your privacy and takes care in protecting your personal data. As a data controller, we comply with the Cayman Islands Data Protection Act (2021 Revision) "DPA".

What personal data we collect

In order to provide a seamless service, the Learning Management System (LMS) is pre-populated with the following employee personal data:

First Name; Last Name (s); Ministry/Department/Division; Position/Job Title; Work Email; direct Manager name. This data is periodically updated via a secure direct upload from my-VISTA.

Depending on the nature and content of a course, personal data may also be collected through students using the course forum, or by completing and submitting coursework and assignments by uploading them into the LMS.

Our learning partners

We may choose to offer learning opportunities to employees through carefully chosen partners. Currently our learning partners are:

ILM: UK based learning provider, that complies with the UK GDPR and is compliant with the Cayman Islands DPA. See their privacy notice here: <https://www.i-l-m.com/privacy>

Harvard University: US based learning provider that complies with the principles of the UK GDPR. See their privacy notice here: <https://privsec.harvard.edu/privacy-principles>

We act as a data processor when we collect the following personal data on behalf of our learning partners:

Name and CIG job title and contact details

Date of Birth and nationality (used by our learning partners to verify identity for course registration).

Why do we collect this information and what do we do with it?

We need to collect, use, and store your personal data in order to provide employees with a platform for educational opportunities for knowledge enrichment, maintenance of certain professional qualifications, career advancement and the provision of mandatory training. Our legal basis for the collection of your personal data is for a public function, and legitimate interests in the development of our employees.

We also produce statistics on the total number and type of educational opportunities attained by employees by nationality, but this does not include any personal data about you or the specific details of your enrollment and attainment.

Who has access to your personal information?

System administrators at the Civil Service College have access to all data within the LMS. Assignments and coursework can only be reviewed by the course facilitator. Your personal data will only be accessed by those that need to use it in order to carry out the functions of our educational programs.

Course progress and completion can also be tracked within LMS, with a downloadable tracking report available to students, their direct managers, and local HR/Learning and Development staff.

Our learning partners process your contact and identity verification personal data to enable course registration.

How long do we hold your information?

Program materials, assignments and coursework are held in accordance with an approved Disposal Schedule.

What are your rights? You have the right to:

- Ask for any incorrect information we hold to be put right.
- Ask us not to use your personal information any more.
- Ask us to delete your personal information.
- Request details of the information we hold about you.

Still have data protection questions? Please contact the Portfolio of the Civil Service Information Manager at FOI.POCS@gov.ky

Last updated: March 16, 2026