Insourcing Academy Data Privacy Policy

Last updated: October 29, 2026

This Data Privacy Policy ("Policy") explains how Insourcing Academy ("we", "us", "our") as the Data Controller, collects, uses, discloses, and protects personal information when you access our website, learning services, and Learning Management System powered by Absorb LMS (collectively, the "Platform").

This Policy is intended to comply with applicable data protection laws, with primary alignment to the Cyber and Data Protection Act [Chapter 12:07] of Zimbabwe (CDPA), and international regulations applicable to our global operations, including:
EU General Data Protection Regulation (GDPR)
Protection of Personal Information Act (POPIA – South Africa)
California Consumer Privacy Act / California Privacy Rights Act (CCPA / CPRA)

Where local laws impose additional or higher standards, Insourcing Academy applies the higher level of protection.

1. Scope and Application

This Policy applies to:
Prospective learners
Registered learners
Employer-sponsored / B2B learners
Instructors and administrators
Website visitors

It applies to all personal data processed through the Platform, including Absorb LMS.

2. Definitions

Personal Data / **Personal Information**: Any information that identifies or relates to an identifiable individual.
Data Subject: The individual to whom personal data relates.
Processing: Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
Sponsor: An employer or organization funding or administering learner access.

3. Personal Data We Collect

We may collect the following categories of personal data:
3.1 Identification and Contact Data
Full name
Email address
Phone number
Country of residence
Employer or sponsor name (where applicable)

3.2 Account and Learning Data (via Absorb LMS)
Username and account identifiers
Course enrollments
Learning activity and progress
Assessment attempts and results
Completion and certification records

3.3 Technical and Usage Data
IP address
Device and browser information
Login timestamps
Platform usage logs

3.4 Payment and Transaction Data
Payment status and transaction references

Note: We do not store full credit or debit card details. Payments are processed by third-party payment providers.

4. Lawful Basis for Processing

We process personal data on one or more of the following lawful bases:
Performance of a contract (course delivery)
Consent (where required)
Compliance with legal obligations
Legitimate interests (platform security, quality improvement)

5. How We Use Personal Data

We use personal data to:
Create and manage learner accounts
Deliver courses and assessments
Issue and verify certificates
Communicate platform and course-related information
Monitor academic integrity and platform security
Provide reports to sponsors (for B2B learners)
Meet legal and regulatory obligations

6. Employer-Sponsored (B2B) Learners

Where training is funded or administered by a Sponsor:
Limited learner data (enrollment, progress, completion, assessment status) may be shared with the Sponsor
Sponsors act as independent data controllers for data received
Data sharing is restricted to training oversight purposes

7. Cookies and Tracking Technologies

7.1 Absorb LMS Cookies and Essential Tracking
Our Platform uses Absorb LMS, which sets cookies and similar technologies that are essential for the operation of the learning environment. These cookies are required to:
Authenticate Users and maintain secure login sessions
Remember User preferences and language settings
Enable navigation between courses, lessons, and assessments
Preserve assessment progress and prevent session loss

Without these cookies, core learning and assessment functionality may not operate correctly.

7.2 Analytics and Performance Monitoring
Absorb LMS and our website may collect analytics and usage data to help us understand how the Platform is used and to improve learning outcomes. This may include:
Page views and navigation paths
Course engagement metrics
Assessment completion rates
Time spent within courses or modules
System performance and error logs

Analytics data is generally aggregated and, where possible, de-identified.

7.3 Third-Party Analytics Tools
We may use third-party analytics services (such as website analytics or LMS reporting tools) that set their own cookies or tracking technologies. These tools are used strictly for:
Platform performance analysis
Learner experience improvement
Reporting to Sponsors for B2B training programs

We do not use analytics cookies to sell personal data or to engage in behavioral advertising inconsistent with GDPR, POPIA, or CCPA/CPRA requirements.

7.4 Cookie Management and Consent
Where required by law:
You will be provided with a cookie notice or consent mechanism when accessing the Platform
Non-essential cookies will be used only with your consent
You may manage or disable cookies through your browser settings; however, doing so may affect Platform functionality, particularly within Absorb LMS.

7.5 Do Not Track and CCPA Signals
Where applicable, we honor legally required Do Not Track or Global Privacy Control (GPC) signals in accordance with CCPA/CPRA obligations, to the extent technically feasible.

8. Data Sharing and Disclosure

We may share personal data with:
Absorb LMS as our learning platform provider
Payment Processors
Analytics and IT service providers
Sponsors (for employer-funded learners)
Regulators or authorities where legally required

All service providers are required to implement appropriate security and confidentiality measures.

9. International Data Transfers

Personal data may be processed or stored outside your country of residence.

Where international transfers occur, we implement appropriate safeguards, including contractual protections and security controls, in line with the CDPA,GDPR, POPIA, and CCPA requirements.

10. Data Retention

We retain personal data only for as long as necessary to:
Deliver training services
Maintain academic and certification records
Comply with legal, regulatory, or accreditation requirements
Retention periods may vary depending on the type of data and applicable law.

11. Data Subject Rights

Depending on your jurisdiction, you may have the right to:
Access your personal data
Correct or update inaccurate data
Request deletion of personal data
Restrict or object to processing
Data portability (GDPR)
Opt out of the sale or sharing of personal data (CCPA/CPRA)

Requests may be submitted using the contact details provided

12. Security Measures

We implement appropriate technical and organizational safeguards to protect personal data, including:
Access controls
Secure hosting environments
Role-based permissions within Absorb LMS
Encryption where appropriate
No system is completely secure, and we cannot guarantee absolute security.

13. Children's Data

The Platform is not intended for children under the age of 18, unless enrolled with appropriate parental or institutional consent.

14. Policy Updates / Changes

We may update this Policy from time to time.

Material changes will be communicated through the Platform or by other appropriate means.

15. Contact Information

For questions, concerns, or data protection requests, contact:

Email: admin@insourcingacademy.com
Institution: Insourcing Academy

By using the Platform, you acknowledge that you have read and understood this Data Privacy Policy.