

PRIVACY POLICY – Digital Excellence Awards 2020

OVERVIEW

Our Intent. We are committed to safeguarding the privacy of schools and Data Subjects (you) when submitting an entry in the Digital Excellence Awards 2020; we will only use the information we collect about your school lawfully.

Changes to Data Protection Legislation. The European Union's General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA 2018), has introduced significant and enhanced rights for Data Subjects, including participating in this audit. This Privacy Notice seeks to outline these rights and also the way personal data is processed in this audit, so that Data Subjects (you) have transparency.

Data Subject's Privacy Notice. This Privacy Notice should be read by Data Subjects, i.e. "you," or any identifiable person submitting an entry to the Digital Excellence Awards from London Grid for Learning (LGfL).

The Data Controller. The Digital Excellence Awards Competition is being conducted by London Grid for Learning (LGfL). Our contact details are:

- Email: dataprotectionenquiries@lgfl.net
- Mail: 9th Floor, 10 Exchange Square, Primrose Street, London, EC2A 2BR.

Data Protection Officer (DPO). LGfL's DPO can be reached at dataprotectionenquiries@lgfl.net. The LGfL DPO fulfils a number of roles, one of which is to be the primary and independent point of contact for Data Subjects, namely you. If you wish to contact the LGfL DPO, please email or send a letter to our contact details above.

Purpose of Processing Personal Data. The form for entering the Digital Excellence Awards will collect data to support entry for the competition. The collection of data will take place throughout November 2019 and the entries will be reviewed by LGfL and a panel of judges in February and March 2020.

Lawful Basis of Processing Personal Data When Visiting This Website. The lawful basis of processing your personal data when entering for the Digital Excellence Awards 2020 is assessed to be: **Consent**. Once you have agreed to this Privacy Notice, all processing of personal data will be based upon Consent.

Categories of Anonymised Personal Data Processed. The entries will be shared with the judging panel in order for them to decide on a shortlist for each category of the awards.

Categories of Personal Data Processed by LGfL. The Digital Excellence Awards 2020 will process:

- Your name and email address.

Data Processing. The Digital Excellence Awards 2020 will be initially processed by the LGfL Project Manager to prepare them for judges shortlisting, including removing of your school name, your email address and specific school unique identifiers, as an additional safeguard of anonymity, leading to an anonymous statistical entry.

Transfer of Personal Data Outside the EEA (European Economic Area). The Digital Excellence Awards 2020 will use the Google for Education Suite forms platform. All personal data will be collected and managed within the EEA and transferred to the USA under the EU/US Privacy Shield agreement. All statistical analysis will be conducted on downloaded files on specific UK based computers and servers.

Sensitive Personal Data. There is no Sensitive Personal Data collected and processed in this survey.

Sale or Passing of Personal Data to Third Parties. We will not sell or pass your personal data to any company, other than those described above. However, to support Safeguarding or Law Enforcement investigation, LGfL may be required to pass personal data outside of normal processes, for very specific and limited purposes.

Retention of Personal Data. LGfL will retain the data for one year after the awards have been collated and then securely dispose of it.

Data Subject's Rights. Under data protection legislation you have a number of Rights which we have outlined below:

• **Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is best achieved through submitting a Subject Access Request (SAR). In summary, Data Subject's (you) have the right to obtain:

- Confirmation that your data is being processed;
- Access to your personal data (a copy); and
- Other supplementary information, which corresponds to the information in this Privacy Notice.

Fees and Timings. This information will be provided to you without charge; without delay and within one month. If an extension is required you will be informed of this. If requests are considered manifestly unfounded or excessive, in particular because they are repetitive, LGfL may choose to:

- Charge a reasonable fee taking into account the administrative costs of providing the information; or
- Refuse to respond.

The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) <https://ico.org.uk> will be highlighted.

Identify Verification. To protect your personal data, LGfL will seek to verify your identity before releasing any information, which will normally be in electronic format.

• **Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. If any data held about you is inaccurate or incomplete, LGfL will respond within one month of your request. In the unlikely event LGfL does not act on the request for rectification, LGfL will inform you of your rights to complain or seek judicial remedy.

• **Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten.*' However, you do have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- When you withdraw consent (and this is the basis of processing);
- When you object to the processing and there is no overriding legitimate interest for continuing the processing;
- The personal data was unlawfully processed;
- The personal data has to be erased in order to comply with a legal obligation; and
- The personal data is processed in relation to the offer of information society services to a child.

• **Right to Restrict Processing.** When processing is restricted, LGfL are permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you by LGfL.

• **Right to Data Portability.** You may request to obtain and reuse your personal data

for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:

- To personal data you have provided to LGfL;
- Where the processing is based on your consent or for the performance of a contract; and
- When processing is carried out by automated means.

In these circumstances LGfL will provide a copy of your data to you in CSV format free of charge, without undue delay and within one month. If there is a delay to this, you will be informed by LGfL.

• **Right to Object.** You have the Right to Object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics.

• **Automated Decision Making and Profiling.** LGfL do not employ any automated decision-making or conduct profiling of Data Subjects.

Cookies. This section outlines the type of cookies we apply to the Digital Excellence Awards 2020. By participating in this competition, you agree your personal information will be handled as described in this Privacy Notice. The cookies we may use in this audit are described as below:

• **Strictly Necessary Cookies.** These are cookies that allow you to use different parts of our website. Without them different features that you have requested cannot be provided. These are usually set in response to an action performed by the user like clicking on a link or failing to enter the correct password to your account.

• **Functional Cookies.** These help us to make your experience within our site more personal. For instance, knowing if you have been on the site before so that messages for new visitors are not displayed to you.

• **First Party Cookies.** These are cookies that are set by our website. And only we can read them.

• **Session Cookies.** These are stored while you browse our site and then deleted once you leave.

- **Persistent Cookies.** These are saved on your computer and won't be deleted when you close the web page. We use these to provide functionality like keeping you logged in when you come back to the site.

- **Performance Cookies.** These help us to track how people are using our site. They help us to know what pages people are using most and how users navigate around the site, we use this information to make informed decision about how we can improve the user experience of our site. The information we get using these cookies is completely anonymous and we will make no attempt to identify you or influence your experience of our site while you are on it.

To find out more about the type of cookies Google forms use, please visit this link - <https://policies.google.com/technologies/types?hl=en>

How Do We Use Your Data? We use the data that we collect about you for the following purposes:

- To communicate with you about whether your entry was successful ie if you have been shortlisted; and
- To respond to any enquiries that you submit to us.