

PRIVACY POLICY – LGfL Freedom2Roam

OVERVIEW

Our Intent. We are committed to safeguarding the privacy of users of our services and we will only use the information we collect about your school lawfully.

Changes to Data Protection Legislation. The UK Data Protection Act 2018 (DPA 2018) and the European Union’s General Data Protection Regulation (GDPR), has introduced significant and enhanced rights for Data Subjects, including users of this service. This Privacy Notice seeks to outline these rights and also the way personal data is processed by Freedom2Roam, 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 using the London Grid for Learning (LGfL) Freedom2Roam service.

The Data Controllers. Schools (including nurseries and colleges), act as the Data Controllers for Freedom2Roam. They are the organisations that decide the purpose and means of processing. The Data Controllers are responsible for, and own all of the data that resides within their school and the systems they use provided by LGfL.

The Data Processor. LGfL and their sub-processor Adept Education provides Freedom2Roam for LGfL client schools as their Data Processor. This Privacy Notice is intended to provide an overview of how LGfL, supported by Adept, manages personal data used in Freedom2Roam. Our contact details are:

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

Data Protection Officer (DPO). Your school will have a DPO who should be your first point of contact for data related queries as they are the Data Controller. 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 policies for using Freedom2Roam is the responsibility of individual Data Controllers (schools) and their users. The Freedom2Roam system is intended to provide LGfL customers with the ability to connect to their network from remote locations.

Lawful Basis of Processing Personal Data When Visiting This Website. The lawful basis of processing your personal data when using Freedom2Roam is *“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.”*

Categories of Personal Data Processed by LGfL. The information within Freedom2Roam should be within the policy of individual Data Controllers and is the

responsibility of their users. However, Freedom2Roam will as a matter of routine process the following data:

- USO User First Name;
- USO User Surname;
- USO and or Active Directory Username;
- USO and or Active Directory password. This is stored securely (encrypted) on our systems;
- Workstation and Server IP addresses of destination computers; and
- Workstation and Server IP addresses of connecting computers.

Transfer of Personal Data Outside the EEA (European Economic Area). Freedom2Roam is only processed using UK based servers.

Sensitive Personal Data. We will never collect sensitive personal data about you without your explicit consent or under the relevant lawful purpose. There is no sensitive personal data collected and processed in Freedom2Roam. However, it is recognised that users of this system may process sensitive personal data as a matter of routine to perform their tasks.

Sale or Passing of Personal Data to Third Parties. We will not sell or pass your personal data to any company without your explicit consent. 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 log files for connections in to the Freedom2Roam platform for the current academic year, plus the previous academic year (September to August) and then securely dispose of it. This is required to provide support to customers. This will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.

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) to the Data Controller, which is your school. LGfL and Adept will support the relevant Data Controller where required. If a Data Controller of an LGfL system requires any assistance with SAR's, please raise a case on the LGfL Support Site at support.lgfl.net. 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 by the Data Controller (your school). If an

extension is required you will be informed of this by the Data Controller. If requests are considered manifestly unfounded or excessive, in particular because they are repetitive, the Data Controller and or 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 by the Data Controller 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, the Data Controller will seek to verify your identity before releasing any information, in a format specified by the Data Controller. This is typically in an 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, the Data Controller will respond within one month of your request. In the unlikely event that the Data Controller or LGfL does not act on the request for rectification, the Data Controller 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 the Data Controller.
- **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 the Data Controller and subsequently 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 in CSV format free of charge to the Data Controller, without undue delay and within one month. If there is a delay to this, you will be informed by the Data Controller.

- **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 Freedom. By using Freedom2Roam, you agree your personal information will be handled as described in this Privacy Notice. The cookies we may use for Freedom2Roam are described as below:

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

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

- To provide services related to your Account;
- To communicate with you about your use of Freedom2Roam, your Account and/or Services we offer or make available through Freedom2Roam;
- To respond to any enquiries that you submit to us;
- To operate and improve Freedom2Roam; and
- To better understand how users access, use Freedom2Roam and their Accounts, both on an aggregated and individualised basis, for the purposes of improving Freedom2Roam.