

## PRIVACY NOTICE – LGfL GENERAL

### OVERVIEW

**Our Intent.** We are committed to safeguarding the privacy of users to our website and we will only use the information we collect about you lawfully.

**Changes to Data Protection Legislation.** The introduction of 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 users of these services. This Privacy Notice seeks to outline these rights and also the way personal data that is processed via services on this site, so that Data Subjects 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) services.

**The Data Controller.** This website <https://www.lgfl.net> is owned and operated by LGfL. LGfL provide a number of services for Local Authorities (LAs) and schools (including nurseries and colleges), normally in the capacity of a Data Processor. This privacy notice is intended to provide an overview of how LGfL manages personal data, including on this website. Our contact details are:

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

**Data Protection Officer (DPO).** LGfL have appointed a DPO who can be reached at [dataprotectionenquiries@lgfl.net](mailto: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. The preferred mechanism for Data Subjects to raise concerns regarding the processing of their personal data by LGfL is to email or send a letter to our contact details above, at which point the enquiry will be forwarded to the DPO of the Data Controller or respective member of staff for action.

**Purpose of Processing Personal Data When Visiting This Website.** We collect personal data on this website primarily to support the delivery of information to users of this website. When using the Personalisation service on this website, we use your information to provide you with a tailored experience enabling you to save web links as bookmarks, making it easier for you to access your favourite LGfL online education resources.

**Lawful Basis of Processing Personal Data When Visiting This Website.** The lawful basis of processing your personal data when visiting this website is considered to be Legitimate Interest, or what is reasonable to expect. See our section on cookies below to see the different types of cookies we use and for what purpose on this website. When using the Personalisation service of this website, your consent will be required.

**Purpose of LGfL Processing Personal Data Within Services.** LGfL's core purpose is to help deliver education services for our customers, which are LAs and schools. In this capacity we collect personal data for a range of educational tools, enabled by an identity access management tool, called Unified Sign-On (USO). See separate Privacy Notice for USO.

**Lawful Basis of Processing Personal Data When Using LGfL Services.** Unless covered by a specific Privacy Notice, LGfL services are normally delivered on the basis of Consent, or for Staff, sometimes under Contract (with the employer who is the respective Data Controller).

**Categories of Personal Data Processed by LGfL.** The information we hold as a result of visiting this website is minimal and primarily related to the device which you use. This may mean you can be associated and identified by this. More detailed personal data is collected when individual's use specific services.

When using the Personalisation service of this website, we collect, with your consent, the following information:

- Name;
- Email Address; and
- Teaching Roles.

Across all LGfL processes and services we will seek to ensure all personal data is accurate and up to date. The personal data which we hold will be held securely and in accordance with our internal data protection and security policies.

**Category of Recipients of Personal Data.** LGfL acts as a Data Processor under the instruction of the Data Controllers, schools (which includes nurseries and colleges for the purposes of this Privacy Notice) and local authorities, to enable them to deliver education services. Data is shared with them in accordance with their requirements.

**Transfer of Personal Data Outside the EEA (European Economic Area).** Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, to support specific processes. If this is required, appropriate measures will be put in place to support international transfers.

**Sensitive Personal Data.** We will never collect sensitive personal data about you without your explicit consent or under the relevant lawful purpose. We will provide a clear explanation why it is required in the related Privacy Notice.

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

**Retention of Personal Data by this Website.** We will retain any data collected on this website only for the period of the session or on acceptance of cookies to enable you to revisit the site again more easily. For the Personalisation service, your data

will be retained for as long as you, or your school, consumes LGfL services or until you withdraw your consent.

**Retention of Personal Data by LGfL.** A master retention policy for personal data processed by LGfL is being constantly developed. This details the retention of personal data collected from you for different purposes.

**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 either the school or your home Local Authority (where you live). LGfL and Atomwide will support the relevant Data Controller. If a Data Controller of an LGfL system requires any assistance, please log this via the LGfL Support Site at [support.lgfl.net](https://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 without charge; without delay and within one month. 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, Data Controllers 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, the Data Controller, or LGfL and Atomwide on their instruction, 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, the Data Controller (LA or school), supported by LGfL and Atomwide, will respond within one month of your request. In the unlikely event the respective Data Controller does not act on the request for rectification, they should 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. However, you should note LGfL provide educational services to Data Controllers which may not be considered information society services, i.e. social media.
- **Right to Restrict Processing.** When processing is restricted, LGfL and Atomwide, upon instruction from the respective Data Controller, 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 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, under the instruction of the Data Controller, will provide a copy of your data to the Data Controller 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 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 our website <https://www.lgfl.net> and the services we offer. By using the website, you agree your personal information will be handled as described in this Privacy Notice. The cookies we may use on our website 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 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.

**Third Party Cookies** - These can be things like Google Analytics and other embedded content.

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

**Third Party Website Links.** Our website may contain links to other third-party websites. Any access to and use of such linked websites is not governed by this Privacy Notice, but, instead, is governed by the privacy notices of those third-party websites, and LGfL is not responsible for the information practices of such third-party websites.