

PRIVACY NOTICE – LGfL USO

Our Intent. We are committed to safeguarding the privacy of users of our services.

Data Protection Legislation. The European Union’s General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA 2018) govern the rights of Data Subjects, including processing of personal data in the Unified Sign-On (USO) Service. This Privacy Notice seeks to outline these rights and also the way personal data is processed, to give Data Subjects 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) Unified Sign-On (USO) Service managed by Adept Education.

The Data Controllers. Local Authorities (LAs) and schools (including nurseries and colleges), act as the Data Controllers for the USO Service. They are the organisations that decide the purpose and means of processing your data.

The Data Processor. LGfL and their sub-processor Adept Education provide the USO Service (an Adept Education proprietary product) for LAs and schools as their Data Processor. This Privacy Notice is intended to provide an overview of how LGfL, supported by Adept Education, manages personal data used in USO. LGfL’s contact details are:

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

Data Protection Officer (DPO). Your home Local Authority (where you live) or the school to which you are associated with, will have a DPO who should be your first point of contact for data related queries as they are the Data Controller. LGfL have also appointed a DPO who 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. The preferred mechanism for Data Subjects to raise concerns regarding the processing of their personal data by LGfL is to contact your Local Authority or the school to which you are associated with as they are the Data Controller. If you wish to contact LGfL, please email or send a letter to our contact details above, at which point the enquiry will be forwarded to the DPO of the respective Data Controller.

Purpose of Processing Personal Data When Using LGfL USO Service. The purpose of USO is to enable customers to authenticate with services provided by or through LGfL, or by federated third party service providers. In particular:

- **Identity and Access Management.** When a user requests access to a service, USO checks if they have permission to access that service, and if permission is found, informs that service of who the person is, and what aspects of the service that person can access.
- **Personalisation.** USO can pass personal data to the service in order for the user to see that this is a service they have access to, and that it is tied to their identity. The amount of personalisation available differs between software.

- **Home Access.** Through the USO system, users can log into their work / school services from home.
- **Security.** USO allows authorised personnel to assist users with password reset requests and also apply security policies to enhance security.

Lawful Basis of Processing Personal Data When Using LGfL Services. The lawful basis of processing your personal data when using the USO Service 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 personal data within USO is minimal and only what is required to enable the service:

- Name;
- Address;
- Contact Telephone Number;
- Email Address;
- Username;
- Password; and
- PIN and Full Name for Early Years users only.

Some services authenticated by USO make use of YouTube API Services, for example, myVideos which allows teachers to search for YouTube videos and for pupils to watch them in myUSO. The YouTube Terms of Service can be referenced [here](#).

Some services authenticated by USO make use of Google API Services, for example, automated G Suite user account creation. The Google Privacy Policy can be referenced [here](#).

Category of Recipients of Personal Data. LGfL acts as a Data Processor under the instruction of the Data Controllers (LAs and schools), to enable them to deliver education services. Data is shared with the Data Controllers in accordance with their requirements.

Transfer of Personal Data Outside the EEA (European Economic Area). USO is only processed using UK based servers, however due to links to You Tube and Google API Services, some data may be transferred to the USA, in accordance with the You Tube and Google Privacy Polices above.

Sensitive Personal Data. We will never collect sensitive personal data about you without your explicit consent or under the relevant lawful purpose. USO does not require any sensitive personal data, but some services which it authenticates may do so, i.e. eAdmissions.

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 collected through USO outside normal processes, for very specific and limited purposes.

Retention of Personal Data within USO. USO personal data is maintained dynamically and linked to active accounts. However, this is dependent upon Data Controllers, customers or users, keeping their details up to date. If a USO account is no longer active, the retention is determined according to the details below:

- Parent USO Account - Delete after 3 years of inactivity;
- Teacher USO Account – Delete after 1 year of inactivity;
- Pupil USO Account – Delete after 6 months of inactivity; and
- 3PSO USO Account – Delete after 1 year of inactivity.

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 that you are associated with or your home Local Authority (where you live). LGfL and Adept Education 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. 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 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, or LGfL and Adept Education 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 Adept

Education, 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 Adept Education, 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 provided to LGfL by the respective Data Controller;
 - 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, the respective Data Controller, or LGfL if instructed to do so by the Data Controller, will provide a copy of your data 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 respective 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 and Adept Education do not employ any automated decision-making or conduct profiling of Data Subjects.