

Camden Learning Privacy Policy

Camden Learning Limited ('the Company', 'we', 'us' or 'our'), in the course of its business and delivery of services collects, uses and processes Personal Data. This policy is designed to advise you of your rights and tell you what you can do if you have questions about our approach to personal data.

We recognise that we have a duty to treat the information we hold on individuals responsibly, keeping it safe and secure, processing it correctly and proportionately. We are committed to protecting your privacy online.

Our contact details

Camden Learning Ltd,
11th Floor
5 Pancras Square
London
N1C 4AG

Tel 020 7974 1122
customersupport@camdenlearning.org.uk

Information Commissioner's Office Registration Number: ZA300664

Our Data Protection Officer is Andrew Maughan, the London Borough of Camden's Borough Solicitor, contactable at dpo@camden.gov.uk. If making a subject access request or other use of your rights, please copy in customerservice@camdenlearning.org.uk who will fulfil the request.

Camden Learning is the controller for the purposes of data protection laws.

Why we collect Personal Data

We collect and hold personal information relating to our users, and in relation to any individuals included in data sets that are being processed by the company under contractual agreements and legitimate interest.

We may share Personal Data with other agencies, but only as necessary under our legal duties or otherwise in accordance with our duties/obligations as a Company.

The Personal Data we are provided with or collect; is provided to us on a voluntary basis when users register or purchase products from this website or under contractual agreements including with the London Borough of Camden and our member and associate member schools.

Below are set out the reasons why we collect and process Personal Data, the legal basis for this processing is contract and legitimate interests:

- **to provide our customers with the appropriate level of service:** we will process Personal Data in order to effectively communicate and deliver our services to all users.

- **assess the quality of our services:** we will process Personal Data so that we may reflect on our own practices to help us improve and provide the highest quality services that we can to all users.
- **to review data relating to our customers' subjects:** Under contractual arrangements with our customers, and in our capacity as data processors, we will process data provided by our customers. This data may include, but not be limited to, personal data and information relating to members of school staff, pupils in our customers' schools or Early Years settings and other members of the school community including parents and governors. We will only process data for the purposes specified by the contractor.

Categories of Data we collect about you

As a user of our services, we may collect the following Personal Data about you (please note this list does not include every type of personal data and maybe updated from time to time:

1. your name;
2. name of your organisation;
3. telephone number;
4. email address;
5. any postal addresses that you provide.

This information will be taken from you at the time that you register for our services, make a purchase from us, or contact us through the Contact Us page. Contact information is used to respond to enquiries, for the delivery of services or get in touch with you when necessary.

We need to collect and use information about you to:

- deliver education services;
- understand your needs to provide the services that you ask for or need;
- understand what we can do for you and inform you of other relevant services and benefits we provide;
- ask your opinion about our services; and
- allow us to undertake statutory functions on behalf of the London Borough of Camden efficiently and effectively.

We will not share information with third parties without consent unless we are required to do so by law. We will disclose Personal Data to third parties if we are under a duty to disclose or share your Personal Data to comply with any legal obligation.

This may include sharing data with our Local Authority, the DfE, the Police and other organisations where necessary.

How data will be processed

Personal Data may be processed in a variety of ways; this will include but is not limited to:

- maintaining written records;
- identification;
- sending by e-mail;
- adding to spreadsheets, word documents or similar for the purposes of assessing personal;

- your image and voice maybe included in recorded CPD training and /or meetings; data;
- for educational software use (this could be for the purposes of helping children learn, discipline, reports and other educational purposes).

We use this information for the following reasons:

- to process any orders, you make through our e-commerce platform
- to improve our products and services
- for marketing our products and services to you
- for market research
- to carry out our obligations under contracts with other data processors

Zoom Conferencing:

We may on occasions record (using Zoom as the video conferencing platform) our CPD / training sessions and meetings. We do this using legitimate interests as our legal processing basis. However, participants will be given notice by e-mail in advance that the session is going to be recorded. At the beginning of the session the presenter / meeting leader will remind the group it is being recorded and participants will be made aware that they always have the option to turn their video off in the recorded sessions. Participants will be able to ask questions by the chat box if they don't want their voice recorded.

The presenter / meeting leader should also state at the beginning of the session attendees / delegates are not permitted to make their own recordings. The Company legitimately wishes to protect its intellectual priority and copyright of its materials and content

Where we store data and how we keep data secure

We are strongly committed to data security, ensuring that the data (including recorded meetings or CPD sessions) we process is handled securely, and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic and procedures to seek to safeguard the information you provide to us

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website e.g. CPD or consultancy booking, you are responsible for keeping this password confidential. You must not share your password with anyone and doing so may void any contract we hold with you.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy.

This site has security measures in place to protect against loss, misuse and the alteration of the information under our control. All instances of unauthorised attempted access to our site are logged and thoroughly investigated. Where necessary in extreme circumstances the Company will inform the police or other relevant organisations regarding misconduct.

We respect the privacy of email accounts and we store your email addresses securely. Your details will not be passed to ANY organisation beyond us without your explicit permission unless the law or a court order requires us to do so.

However, we may use email to keep you up to date with news about products, services and offers that we think maybe are of interest to you. We will seek your consent before doing so, and you will be able to withdraw this at any time by emailing customerservice@camdenlearning.org.uk

Retention periods

We will keep your personal data for no longer than reasonably necessary to achieve the purposes for which it was originally collected.

Once the retention period concludes, the data is securely and safely destroyed/deleted. Other circumstances when your personal data could be amended or deleted are

- the accuracy of the Personal Data is being contested by you;
- the processing of your Personal Data is unlawful, but you do not want the relevant Personal Data to be erased; or
- we no longer need to process your Personal Data for the agreed purposes, but you want to preserve your Personal Data for the establishment, exercise or defence of legal claims.

Where any exercise by you of your right to restriction determines that our processing of particular Personal Data is to be restricted, we will then only process the relevant Personal Data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

Your Rights

As an individual, you have rights on how personal information about you is obtained, processed, stored and disclosed to others, including:

- The right to access any personal information we hold about you
- The right to request the correction of inaccurate personal information we hold about you.
- The right to request that we delete your data, or stop processing it or collecting it, in some circumstances
- The right to stop direct marketing messages and to withdraw consent for other consent-based processing at any time
- The right to complain to our Data Protection Office (see Making a Complaint section below), and ultimately if you remain dissatisfied you have the right to complain directly to the Information Commissioner.

Controlling your information

If at any time you wish to stop receiving information from us, please contact us and we will update our records accordingly. If you believe that any information we hold about you is incorrect or in-complete then please write to or email us as soon as possible and we will promptly correct any information found to be incorrect

To change or modify information previously provided, you can send an email to customersupport@camdenlearning.org.uk identifying yourself and asking that we correct or update the data we hold.

Alternatively, write to us at the address given above

Copies of your information (Requesting your Data)

You are entitled to request details of Personal Data that we hold about you. You are entitled to access that Personal Data and the following information (unless an exception applies:

- a copy of the Personal Data we hold concerning you,
- details of why we hold that Personal Data;
- details of the categories of that Personal Data;
- details of the envisaged period for which that Personal Data will be stored, if possible;
- information as to the source of Personal Data where that Personal Data was not collected from you personally.

If you wish to request your data or otherwise exercise your rights in respect of your data, please contact the Data Protection Officer at the email address above.

Making a Complaint

If you are unhappy with the way we have dealt with any of your concerns, you can make a complaint to the ICO, the supervisory authority for data protection issues in England and Wales. We would recommend that you complain to us in the first instance using our complaints procedure, but if you wish to contact the ICO on the details you can do so on the details below.

The ICO is a wholly independent regulator established to enforce data protection law. If you remain dissatisfied, then you have the right to complain directly to the Information Commissioner. The Information Commissioner can be contacted at casework@ico.org.uk You can find out more about the way these rights work from the website of the Information Commissioner's Office (ICO).

Changes to this Policy

Any changes we make to this notice in the future will be posted on our website and, where appropriate, notified to you by e-mail.

Date June 2020