**Privacy Statement**

Pennine Education Ltd respects your privacy and is committed to protect the personal information that you share with us. Generally you can browse through the Website without giving us any personal information about yourself. The information supplied to Pennine Education Ltd by Supported Schools is entered on a database holding details of members of the schools staff who will log calls with us. This information is supplied by the school. The purpose of the information is to enable us to log support calls and contact you with resolution for the support calls. The data is only used within Pennine Education Ltd, and is not divulged to any third party outside the company, in accordance with current Data Protection legislation.

**Data Protection Policy**

Pennine Education Ltd has a Data Protection Policy which has been reviewed and updated in line with the new GDPR regulations.

**Privacy Notice**

Pennine Education Ltd are members of the ICO Registration number ZA277491 We hope this information is clear and transparent, but if you have any questions, please get in touch via the contact details at the bottom of the page.

Contents

1. Who collects your personal information
2. How we collect it
3. What personal information do we collect
4. How we use your personal information
5. What our legal basis is for processing your personal information
6. Where your data is stored
7. How long do we keep your personal information
8. Who we share your personal information with
9. How you can amend your preferences
10. Your rights

1. **Who collects your personal information**

Pennine Education Ltd

Hollinwood Business Centre

Albert Street

Oldham OL8 3QL

Email: info@pennineeducation.co.uk

Data Protection Contact Elaine Smith email address esmith@pennineeducation.co.uk

1. **How we collect it**

Your data is collected from the School Information Sheet which is completed upon a contract enquiry and renewal

1. **What personal information do we collect**

We collect personal information about you (such as your name, address, email address or telephone number) when the school completes a School Information Sheet as part of becoming a customer, registering for a support contract.

 The data held by Pennine Education Ltd is as follows:

School name, School address, School telephone number, School DfE Number

School Contacts names with email addresses.

Training Courses Attended by Name

Technical Information of Server including:

Agreed User accounts to access server, SIMS.net, FMS with full permissions.

Details of additional Software used by the school

As an employee of a contracted customer, in order to provide our services to your organisation we may need to collect personal information which data protection legislation defines as **special category data,** such as dietary requirements for a training registration, or screenshots of data within the software you’ve purchased that we need in order to investigate and resolve a support case. As a customer you agree to the need for us to process this information as part of your organisation’s contract with Pennine Education Ltd, or by submitting this information through the website.

1. **How we use your personal information**

We may use your personal information following a:

**• Customer visit** - whereby we may contact you regards to items discussed or similar products and solutions you have expressed an interest in.

**• Training/Consultancy attendance or registration** in order to contact you about the event itself and/or possibly future events and/or to obtain feedback. When registering for training we may ask you for special category data, such as dietary requirements, in order to meet your needs at the event(s).

• **General enquiry or feedback** where you may have contacted us via telephone, email or other channels requesting information about products and services and we may use the data captured to help improve services or assist in finding a resolution to your enquiry.

• **Product Purchase** where we may have obtained your data following the signing of a contract. We may use this data to contact you about your support contract, financial queries, renewals and other useful information that will help you get the most out of our services.

• **Sales Enquiry** where you may have contacted us via telephone, email or other channels requesting information about services we have to offer or we have contacted you and you have expressed an interest.

• **Support Enquiry** where you may have contacted us via telephone, email or other channels to log a support enquiry about an issue or for general assistance. We may use the data captured to help to resolve your enquiry and may contact you after for feedback to help improve the service offered.

• **Training attendance** where we may obtained your details following the attendance our training course. We may use your data for the purpose of obtaining feedback to help improve the service offering, as well as for the process of completing our training satisfaction analysis.

• **Your website** – Occasionally we may need to obtain your details from your company website or from a publicly available website, such as GIAS.  We will only process data if a suitable legal basis has been established and will only keep the data for a short period of time unless you have consented via any of the examples mentioned above.

1. **What our legal basis is for processing your personal information**

We will only collect and use your personal information (as described in section 4) in accordance with data protection legislation. Our legal basis for processing your personal information are as follows:

**1. Contractual** – We may process personal data associated to a contract or training/consultancy purchase. It is important for us to hold this data in order to ensure that we have records from a legal perspective to whom signed and agreed to the terms of agreements and who to contact following issues and/or to send renewal information.

**2.** **Consent** – Where necessary we will only collect and process your personal information if you have given your consent for us to do so by completing the contacts on the Schools Information Sheet and by signing the Sims Support Agreement.

**3. Legitimate Interests** – We may use and process some of your personal information where we have conducted Legitimate Interest Assessment and have a legitimate business grounds for doing so. Under European privacy legislation here is a concept of “legitimate interests” as a justification for processing your personal information. As such, we may send you direct marketing if you are either an existing customer.

You have a right to object to our use of your personal information for these legitimate interests. Please see **section 10 - Your rights** and how to contact us for how to do this.

1. **Where your data is stored**

**Customer Management System**

We store the Pennine Education Ltd.’s customers’ personal information in our cloud-based enterprise business systems Freshdesk. The system is hosted on Amazon AWS servers which promise data security for all its customers. The data is held within a secure datacenter in Virginia,USA. The datacenter is EU safe harbor compliant and includes SSL encryption to keep the data safe. Freshdesk is ISO 27001 compliant.

GDPR does not require EU personal data to stay in the EU, nor does it place any new restrictions on the transfer of personal data outside the EU. GDPR only mandates that such transfers be legitimized through any of the mechanisms provided in the regulation. Some ways of legitimized transfers are through EU-US Privacy Shield Certification and Model Contractual Clauses. Freshdesk uses both ways to legitimize data transfers

*More information can be found at the following sites*

[*https://www.freshworks.com/privacy/gdpr/*](https://www.freshworks.com/privacy/gdpr/)

[*https://www.freshworks.com/security/*](https://www.freshworks.com/security/)

**Backup Software**

Schools contractual Personal Data is also held within our cloud based backup system Live Drive.

The files and folders are encrypted using AES 256 bit encryption prior to upload and are kept encrypted on our servers, with the encryption key being stored on our end of the system. Data is stored on multiple RAID 6 volumes over multiple data centres located across London as follows:

1. Interxion: [http://www.interxion.com](http://www.interxion.com/)
• Tier 2 data centre
• Holds ISO 27001:2005
• Interxion reports a 99.999% availability
• You can view the London data centre specification at: <http://www.interxion.com/Data-Centres/London>

2. GS2: <http://www.globalswitch.com/>
• Tier 1 purpose built data centre
• GS2 hold ISO. 9001, ISO 14001 and ISO 27001
•You can view the full London data centre specification at: <http://www.globalswitch.com/media/65560/global%20switch%20technical%20specification%20london%20east.pdf>

**Sage**

Some personal data is held in our financial software Sage, such as name, email address. This data is held locally on Pennine Education Ltd’s server and is behind 3 physical forms of security as well as 2 password protections.

**Pennine Education Ltd website**

When schools log a call or submit a form for an enquiry or training booking using the Pennine Education website a log of that request is held within the website which will contain personal information which may include special category data i.e. dietry requirements.

 Our website is hosted by Weebly Inc. who are based in San Francisco, US. Weebly Inc participates in and has certified its compliance with the EU US Privacy Shield.

Weebly use industry standard SSL-encryption for transmission of data.

You can view weebly Privacy notice by clicking on the link:

<https://www.weebly.com/uk/privacy>

1. **How long do we keep your personal information**

All personal data will be held in accordance with Pennine Education Policy for the duration of the contract, and historical records will not be held without legitimate reason. Essentially, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this notice or until your contract has been terminated in writing.

1. **Who we share your personal information with**

The only people who have access to your personal information are staff within Pennine Education Ltd whom require access to this to carry out their job in order to provide services to you

In addition we sometimes need to provide access to Capita technical analysts in order to receive support if a case is escalated to Capita

1. **How you can amend your preferences**

If any contacts would like to amend their preferences please request in writing by emailing info@pennineeducation.co.uk

1. **Your rights**

Under data protection legislation you have a number of rights in relation to your personal information. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no such information is required, after we have received your request. This section explains what they are and how you can use them, if you wish.

**Accessing your personal information**

You have the right to request a copy of the personal information that we hold about you. This is known as a Subject Access Request.

If you wish to request a copy of your personal information please address requests to esmith@pennineeducation.co.uk

**Correcting and updating your personal information**

The accuracy of your information is important to us. If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by emailing info@pennineeducation.co.uk

**Erasing your personal information or restricting its processing**

You may ask for your personal information to be removed from our systems. Unless we are legally permitted or required to keep the data, we will comply with your request.

You may also ask us to restrict processing your personal information in the following situations:

* Where you believe it is unlawful for us to process the data,
* You have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

If you wish to exercise any of these rights please email your request to esmith@pennineeducation.co.uk. We will endeavor to complete your request as swiftly and diligently as possible.

**Right to lodge a complaint**

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. They can be contacted via:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 01625 545 700

**Changes to our Data Protection Notice**

This document may be updated from time to time so you may wish to check it each time you submit personal information to us.

**Contacting us**

If you any questions or comments regarding the content of this Privacy Notice, please contact:

jhowells@pennineeducation.co.uk