

Diocesan Board of Education

PRIVACY AND 'COOKIE' POLICY

for

[‘http://www.elyeducation.org’](http://www.elyeducation.org) and related services

When this document refers to “elyeducation.org”, ‘DBE’, “we” or “our”,’ it is referring to the Diocese of Ely Education website and related services.

This document does not replace the over-arching privacy and data protection policies of the Diocese of Ely Board of Finance Ltd. (EDBF) under which the Diocese Education Team operate. Instead it seeks to clarify the approach to protecting personal data in the context of the Diocesan Education website “http://www.elyeducation.org”. Nothing in this policy should be considered to contradict or override EDBF policy and processes.

Introduction

We are committed to protecting your personal information when you interact with www.elyeducation.org and any related service. We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018) / UK Data Protection Act and Privacy of Electronic Communication Regulation. The EDBF is Registered with the Information Commissioners Office (ICO).

In order to provide you with the full range of services, we sometimes need to collect information about you. In this respect, this Privacy and Cookies Policy relates to our use of any personal information we collect from you when interacting with us by (for example) phone, SMS, email, in letters and other correspondence and in person in the following indicative contexts:

- any form of consultative or advisory service provided through the website;
- any website or digital application provided and run by us that links to this Privacy and Cookies Policy;
- social media or approved content on other websites;
- mobile devices and video (“Apps”) provided by us;

This Privacy and Cookies Policy explains the following:

- what information we may collect about you;
- how we will use information we collect about you;
- when we might use your details to contact you;

- whether we will disclose your details to anyone else;
- your choices regarding the personal information you provide to us;
- the use of cookies on our websites and how you can reject cookies.

Our online services

This policy applies to any service operated as part of the *elyeducation.org* service and hosted on this domain.

Please note that in the case of the internet, no website can be completely secure; if you have any concerns that your use of *elyeducation.org* could have been compromised e.g. someone could have discovered a password, please get in touch straight away.

Some of our webpages may contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

What information might we seek to collect?

When you participate in, order, access or sign up to any of our web services, activities or online content, we may occasionally request and/or receive personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number, gender or date of birth, as well as information collected about your use of support products and services.

If you are the parent or guardian of a child under 13, we may process limited personal data about you so you can give consent for the child to access some of our services. We may use your contact details to communicate with you about the child's account or use of services.

We sometimes collect information about how you use our websites or other digital content online, and the device(s) you use to access the services. This can include collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet. For more information, please see the section of this policy on our use of cookies and similar technologies, and the section on information collected when you use our Apps on a Smart device such as a TV or mobile device.

How will we use the information it collects?

Where collected, we will use your personal information for a number of purposes including the following:

- to provide our services, activities or online content, to provide you with contextualised information and to respond to your requests and enquiries;
- to provide you with the most user-friendly online navigation experience;
- for "service administration purposes", which means that we may contact you for reasons related to the service, activity or online content you have signed up for, as set out in the section below (e.g. to provide you with password reminders, to notify you that a particular service, activity or online content has been suspended for maintenance, to notify you of major or significant updates to our Privacy and Cookies Policy or Terms of Use, to let you know if your account has become dormant and to ask if you would like to use it again before we close it);
- to contact you about a submission you have made, including any content you provide. For additional information, please see the 'Terms of Use';
- to use IP addresses and device identifiers to identify the location of users, to block disruptive use, to establish the number of visits from different countries.
- for analysis and research purposes so that we may improve the services offered by us.
- we may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Where we propose using your personal information for any other uses we will ensure that we notify you first. Please see the section below for details.

When will we contact you?

We may contact you:

- in relation to any service, activity or online content you or your under-13-year-old child have signed up for, in order to ensure that we can deliver the services, e.g. to verify your email when you sign up for a service account, or to help you reset your password or to ask whether you agree to your child's request for additional account permissions;
- in relation to any correspondence we receive from you or any comment or complaint you make about our services;
- in relation to any personalised services you are using;
- in relation to any contribution you have submitted to a service, e.g. on a message board or via text or voicemail message;
- to invite you to participate in surveys about our services;
- to update you on any material changes to our policies and practices;
- for marketing purposes, as set out in the section below.

We will never contact you to ask for your account passwords, or other login information. Please be cautious if you receive any emails or calls from people asking for this information and claiming to be from the Diocese of Ely Education team.

Will I be contacted for marketing purposes?

We will only send you marketing emails or contact you on our service platforms where you have agreed to this.

Will you share my information with anyone else?

We will keep your information within our organisation except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies, including for child protection reasons) or as described below.

We will only use your information within our organisation and will only share it outside the organisation where you have requested it or given your consent. Sometimes we use third parties to process your information on our behalf, for example to provide services or analysis. We require these third parties to comply strictly with its instructions and also require that they do not use your personal information for their own business purposes, unless you have explicitly consented to the use of your personal information in this way.

Offensive or inappropriate content

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to our website or otherwise engage in any disruptive behaviour on any service, we may remove such content.

Where we reasonably believe that you are or may be in breach of any applicable laws, for example on hate speech, we may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. We would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

What if I am a user aged under 18?

If you are aged 18 or under, please get your parent/guardian's permission before you provide any personal information to us.

How long will we keep my information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. If you delete your account with us then your personal information is deleted immediately, and the remaining information is anonymised for analytical purposes.

Where you contribute content together with your personal information (User Generated Content or UGC) please refer to **the 'Terms of Use'** provided within that service for further information about how long we may store such material.

If you have not used your account in the last year then your account may be classed as dormant and will be deleted in line with this privacy policy. We will email to remind you before deletion so please check your inbox regularly to see if we have sent you any emails about this.

Storage of information

Our website hosting services are based in the UK and most of our data is stored within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our systems are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However, we only allow this when we have reason to believe that it will be adequately protected. (e.g. through, for example, US Privacy Shield or Standard EU contractual clauses).

How we secure your data

Information system and data security is imperative to us to ensure that we are keeping our customers, members, volunteers, employees and contractor safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and as secure as reasonably deemed possible against the ever-changing threat landscape.

Sensitive personal data

The law defines 'sensitive personal data' as (for example) information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

Only in certain very limited circumstances, would we legally collect and process sensitive personal data without requiring explicit consent. For example, we might process data about an Education Team employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

In all other cases we will only process data about, but not limited to, a person's racial and ethnic origin, their sexual orientation or their religious beliefs where they have self-volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

Can I delete my data?

You can always delete, or have deleted, your account or any associated data we hold. Normally such options are presented within the user interface of the service in question, however should you need us to do this for you then email dpo@elyeducation.org A data deletion application will be sent to you.

As explained in the section above, deleting your account will erase any personal information in your account that we have about you and it will mean any data we hold about how you have used services will be made anonymous.

Can I find out what personal information is held about me?

Under the Data Protection Act you have many rights which we fully uphold, including (but not limited to) the right to:

- request a copy of the personal information UKERI holds about you and to have any inaccuracies corrected;
- rectify any personal information held about you;
- have data portability;
- restrict processing on the data held about you;
- object to any data held about you;
- define whether automated decision-making, including profiling, is used and its consequences;
- withdraw from consent at any time;
- understand the consequences (if any) of withdrawing consent.

We do not made any administrative charge for any of the requests made in relation to you exercising your rights, but will require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files or perform any other required duty. Please address requests and questions about this or any other question to dpo@ukeducation.co.uk

Web browser cookies

What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to (for example) your computer, tablet, mobile phone (all referred to here as a "device") or web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we'll assume that you

are happy to receive all cookies on the our website. However, you can change your cookie settings at any time by following your particular browsers instructions (see the browsers 'help' function).

On our website/s, cookies may also record information about your online preferences and allow us to tailor our websites to your interests.

During the course of any visit to a our website/s, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

How do you use cookies?

Information supplied by cookies can also help us to understand the profile of our users and help us to provide a better user experience. It also helps us to recognise when a user is signed in to an account and to provide a more personalised experience. For example, if on a previous visit a user went to a particular set of pages, the web site might automatically find this out from your cookie and highlight additional information on your second and subsequent visits. We use this type of information to help improve the services it provides to its users. Certain areas of our website/s may use cookies for a specific reason - for example, to help animated graphics work effectively on your device.

Third party cookies in embedded content on pages

Please note that during your visits to our website/s you may notice some cookies that are not related to us or our contractors.

To support our services, we very occasionally embed content from social media and other third-party websites. These may include (for example) YouTube, Twitter, Facebook, SoundCloud, Vine, Instagram, Pinterest and Flickr. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third-party cookies may track your use of our website/s. We do not control the dissemination of these cookies and you should check the relevant third party's website for more information.

Where we embed content from social media and other third party websites in our website/s, some websites may use Google Analytics to collect data about user behaviour for their own purposes. We do not control this. For more information, see the Google website.

Our cookies and how to reject them

Full information about cookies, and how to control what cookies are set on your device can be found by using your web browser or device settings. See the 'help' functionality of your device or web browser for further information regarding how to do this.

It is important to note that if you change your settings and block certain cookies, you may not be able to take full advantage of some features of our services, and we might not be able to provide some features you have previously chosen to receive. However, you will not be blocked from using the service if you do not wish to use cookies, but some ease-of-use user-interface elements may be compromised.

Other information collected from web browsers

Your web browser may also provide us with information about your device, such as an IP address and details about the browser that you are using. Where requesting local services, it may be possible for you to choose to provide us with access to your device's location through the web-browser. We sometimes use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to our services and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please contact us at dpo@elyeducation.org

Apps, Devices and Smart TVs

When you download or use our apps on your mobile device or TV, information may be accessed from or stored to your device. Most often this is used in a similar way to a web browser cookie, such as by enabling the app to 'remember' you or provide you with the content you have requested.

Your web browser or device may also provide us with information about your device, such as a device identifier or IP address. Device identifiers may be collected automatically, such as the device ID, IP address, MAC address, IMEI number and app ID (a unique identifier relating to the particular copy of the app you are running).

When you sign in to an app, your sign-in details may be stored securely on the device you are using, so you can access other apps on the same device without needing to enter your sign-in details again.

If you have any concerns about the information which might be accessed from or stored on your device by us, you may wish to only access our content through a web browser and review your web browser settings to limit tracking - see your web browser for more information.

Changes to our Privacy and Cookies Policy

This Privacy and Cookies Policy may be updated from time to time so you may wish to check it each time you submit personal information to us. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use our websites to submit personal information to the site/s. You can also delete your account at any time – please see the section below for details. If material changes are made to the Privacy and Cookies Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

Contacting us about this Privacy and Cookies Policy

If you any questions or comments about this Privacy and Cookies Policy please contact:

The Education Team
(Email: dpo@elyeducation.org)

May 10th 2018