

Privacy Notice for OPT (Omni Progress Tracker)

The OPT System is provided by Daniel Maher ICT Consultancy Ltd.

This notice explains to OPT System Users and Customers how Daniel Maher ICT Consultancy Ltd (“we/us”) use your personal information.

This privacy notice covers:

- Why we use your personal information
- The legal basis for processing
- What personal information we use
- How we use your personal information
- Your rights under data protection legislation
- Sharing personal information with third parties
- How long we may keep your information
- Changes to our privacy notice
- Contact details for our Data Protection Officer

Why we use your personal information

The OPT System is provided to a client (“The Customer”) as a tool for tracking its business objectives and this provision is governed by a contract between us and the client.

The system will include data relating to individuals (“The Data Subjects”) linked to The Customer and can include students, employees, contractors or volunteers. It is the expectation that this data is already covered by data protection law by The Customer by having a legal basis for keeping the data or having sought positive consent from The Data Subjects.

Usernames and securely encrypted versions of Passwords will also be stored in the system for individuals (“The Users”) who are granted access to the system by The Customer and Cordery Castle Limited. Data will also be kept about the dates and times The Users have logged into the system.

We process your personal data for the following purposes:

- to provide The Customer with the service activated and registered for
- to provide The Users with access to the OPT System
- the verification of The User’s identity where required
- for the ongoing administration of the service
- to allow us to improve the products and services we offer to our customers
- for research and statistical analysis including usage patterns
- to enable us to comply with our legal and regulatory obligations
- to offer new products and services to you which are relevant and appropriate, and only to the extent that would be reasonably expected.

If we plan to introduce further processes for the use of your information, we will provide information about that purpose prior to such processing.

The legal basis for processing

Under Data Protection Law, there are various grounds which are considered to be a 'legal basis for processing'.

The legal basis for processing should be determined by the Data Controller.

Where we are the Data Processor, the legal basis is determined by the Customer. Typically, the legal basis in this scenario is:

'processing is necessary for the performance of a task carried out in the public interest'

Where we are the Data Controller, the legal basis for processing is based on:

'processing is necessary for the purposes of legitimate interests pursued by the controller'

It should be noted that in some circumstances this legal basis may vary, however, we always operate in full compliance with Data Protection Law and will only process data with a fair and reasonable legal basis for doing so.

What personal information we process

In order to carry out these services, we obtain data from The Customer based on the requirements stated in The Contract. It is agreed in The Contract that The Customer will have already determined the legal basis for storing this data in existing systems, which may include obtaining consent. This varies depending on The Customer but can include:

Names

Email Addresses

OPT System Usernames and Passwords

Dates of Birth

Genders

Unique Learner Numbers

Photographs

Job Titles

Disability/Special Needs Information

Examination Results

How we process your personal information

We use your personal information, and some of our employees have access to such information, only to the extent required to carry out the services for agreed in The Contract with the Customer.

We have introduced appropriate technical and organisational measures to protect the confidentiality, integrity and availability of your personal information during storage, processing and transit.

Cordery Castle Limited only processes and stores your personal information in the UK.

Your rights under Data Protection Law

1) Right to Access

The Customer and The Data Subjects have the right to access to your personal information that we process and details about that processing.

This can usually be accessed by contacting The Customer in writing. However, should this not be possible, you can raise a Data Subject Access Request (DSAR) to request the data through Cordery Castle Limited.

2) Right to Rectification

You have the right to request that information is corrected if it's inaccurate. The Data Subject can contact The Customer to make the changes on your behalf but in some cases you may have to contact us directly.

3) Right to Erasure (Right to be Forgotten)

You have the right to request that your information is removed; depending on the circumstances, we may or may not be obliged to action this request.

4) Right to Object

You have the right to object to the processing of your information; depending on the circumstances, we may or may not be obliged to action this request.

5) Right to Restriction of Processing

You have the right to request that we restrict the extent of our processing activities; depending on the circumstances, we may or may not be obliged to action this request.

6) Right to Data Portability

You have the right to receive the personal data which you have provided to us in a structured, commonly used and machine readable format suitable for transferring to another controller.

7) Right to lodge a complaint with a supervisory authority

If you think we have infringed your privacy rights, you can lodge a complaint with the relevant supervisory authority. You can lodge your complaint in particular in the country where you live, your place of work or place where you believe we infringed your right(s).

You can exercise your rights by sending an e-mail to maher.d@woodkirkacademy.com. Please state clearly in the subject that your request concerns a privacy matter, and provide a clear description of your requirements.

Note: We may need to request additional information to verify your identity before we action your request.

Sharing personal information with third parties

We host the OPT System using Layershift who store data for this system entirely in the UK, are subject to appropriate safeguards, operating in accordance with our specific instructions and limitations, and in full compliance with Data Protection Law. Their Privacy Policy is available here <https://www.layershift.com/legal/PrivacyandCookiesPolicy.pdf>.

We may also have access to your personal information as part of delivering the service. If we need to change or add additional third parties, we will always update our Privacy Notice accordingly. We will only disclose your information to other parties in the following limited circumstances

- where we are legally obliged to do so, e.g. to law enforcement and regulatory authorities
- where there is a duty to disclose in the public interest
- where disclosure is necessary to protect our interest e.g. to prevent or detect crime and fraud
- where you give us permission to do so e.g. by providing consent within the Cordery Castle Limited products and services or via an online application or consent form

How long we may keep your personal information

We will only retain information for as long as is necessary to deliver the service safely and securely. We may need to retain some records to maintain compliance with other applicable legislation – for example some education laws require certain records to be retained for an extended duration, in some cases for up to seven years or until students reach the age of 25.

Changes to our Privacy Notice

This policy will be reviewed regularly and updated versions will be posted on our websites.