

# Kent County Council's traded education services arm – The Education People

## WEBSITE PRIVACY POLICY

### BACKGROUND:

Kent County Council's traded education services arm – The Education People (and registered as a 'Data Controller' under the Data Protection Act 1998, Reg. No. Z5297748) understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

This Policy applies to Our use of any and all data collected by us in relation to your use of Our Site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>“Cookie”</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;
<b>“Our Site”</b>	means this website <a href="http://www.theeducationpeople.org">www.theeducationpeople.org</a>
<b>“UK and EU Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and of EU Regulation 2016/679 General Data Protection Regulation (“GDPR”);
<b>“We/Us/Our”</b>	means Kent County Council, Reg. No. Z5297748, whose registered address is Room 1, 55 Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ.

## 2. Information About Us

- 2.1 Our Site, [www.theeducationpeople.org](http://www.theeducationpeople.org) is owned and operated by Kent County Council as specified above.
- 2.2 Tracy Palmer is responsible for all aspects of Data Protection and Privacy and their contact details are [tracy.palmer@kent.gov.uk](mailto:tracy.palmer@kent.gov.uk)

## 3. Scope – What Does This Policy Cover?

- 3.1 This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

## 4. What Data Do We Collect?

- 4.1 Some data will be collected automatically by Our Site (for further details, please see section 12 on Our use of Cookies and Our Cookie Policy, other data will only be collected if you voluntarily submit it, for example, when signing up for an Account. Depending upon your use of Our Site, We may collect some or all of the following data:
  - 4.1.1 name;
  - 4.1.2 business/company/organisation name
  - 4.1.3 job title;
  - 4.1.4 contact information such as email addresses and telephone numbers;
  - 4.1.5 demographic information such as post code, preferences and interests;
  - 4.1.6 IP address (automatically collected);
  - 4.1.7 web browser type and version (automatically collected);
  - 4.1.8 operating system (automatically collected);
  - 4.1.9 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);

## 5. How Do We Use Your Data?

- 5.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.
- 5.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests.
- 5.3 Your personal information may be shared with relevant teams within Kent County Council or with external partners and agencies involved in delivering services on our behalf.
- 5.4 We use your data to provide the best possible services to you. This includes:

- 5.4.1 Providing statutory and other services
- 5.4.2 Managing your Account;
- 5.4.3 Providing and managing your access to Our Site;
- 5.4.4 Personalising and tailoring your experience on Our Site;
- 5.4.5 Supplying Our services to you;
- 5.4.6 Personalising and tailoring Our services for you;
- 5.4.7 Responding to communications from you;
- 5.4.8 Supplying you with any email newsletter that you have subscribed to (you may unsubscribe or opt-out at any time by contacting us or via the unsubscribe links provided);
- 5.4.9 Market research;
- 5.5 Kent County Council's trading services arm The Education People may use personal information to identify individuals who need additional support during emergencies or major incidents
- 5.6 By opting in to communications from Us, you agree to communications by the following methods; telephone, email, and post.
- 5.7 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

## **6. How and Where Do We Store Your Data?**

- 6.1 We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it.
- 6.2 However, emails that we send to you or you send to us may be retained as a record of contact and your email address stored for future use in accordance with our record retention schedule. If Kent County Council's trading arm - The Education People needs to email sensitive or confidential information to you, we will perform checks to verify the correct email address and may take additional security measures. If sending us such information we recommend using our secure online forms where provided, or the postal service.
- 6.3 We may process your personal information using web services hosted outside the European Economic Area, but only where a data processing agreement is in place that complies with obligations equivalent to those of the Data Protection Act.
- 6.4 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

## **7. Do We Share Your Data?**

- 7.1 Kent County Council's traded services arm - The Education People does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

- 7.2 Kent County Council's traded services arm - The Education People does not disclose or share sensitive or confidential information without your explicit consent except in a small number of situations where disclosure is required by law, or where we have good reason to believe that failing to do so would put you or someone else at risk.
- 7.3 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 7.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 7.5 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

## **8. What Happens If Our Business Changes Hands?**

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## **9. Your rights**

- 9.1 You may request that Kent County Council's trading services arm - The Education People stops processing your personal data in relation to any Council service. (This may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties).
- 9.2 You are entitled to request access to and a copy of any information we hold about you as specified in Section 11.

## **10. Your Right to Withhold Information**

- 10.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

10.2 You may restrict your internet browser's use of Cookies.

## 11. **How Can You Access Your Data?**

11.1 You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). We reserve the right to charge an administrative fee which will not exceed £20.00. Please contact Us for more details at [hello@theeducationpeople.org](mailto:hello@theeducationpeople.org) or using the contact details below in section 13.

## 12. **Cookies**

12.1 Kent County Council's trading services arm - The Education People does not use cookies for the general running of the [www.theeducationpeople.org](http://www.theeducationpeople.org), but does use them to enable requested services (e.g. payments) and to remember choices during the visit. Anonymous information about page visits is collected using Google Analytics. Using our website confirms your acceptance of our cookies. [\[insert link to cookie page/info\]](#)

## 13. **Contacting Us**

13.1 If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [hello@theeducationpeople.org](mailto:hello@theeducationpeople.org), by telephone on 0345 604 1699, or by post at the registered company address. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

## 14. **Changes to Our Privacy Policy**

14.1 We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.