

PRIVACY POLICY – LGfL Assemble

OVERVIEW

Our Intent. We are committed to safeguarding the privacy of users who use the LGfL Assemble service and we will only use the information we collect about you lawfully.

Changes to Data Protection Legislation. The European Union’s General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA 2018), has introduced significant and enhanced rights for Data Subjects, including users of this service. This Privacy Notice seeks to outline these rights and also the way personal data is processed by LGfL Assemble, so that Data Subjects (you) have transparency.

Data Subject’s Privacy Notice. This Privacy Notice should be read by Data Subjects, i.e. “you,” or any identifiable person using the London Grid for Learning (LGfL) Assemble website.

The Data Controller. LGfL provides LGfL Assemble for all LGfL subscribing schools, who act as the data controller. Your school decides the purpose and means of processing your data.

The Data Processor. The LGfL Assemble website <https://assemble.lgfl.net> is owned and operated by LGfL as your Data Processor and [SchoolVue](#) is the Sub Processor. Our contact details are:

- Email: dataprotectionenquiries@lgfl.net
- Mail: 9th Floor, 10 Exchange Square, Primrose Street, London, EC2A 2BR.

Data Protection Officer (DPO). Your school will have a DPO who should be your first point of contact for data related queries as they are the Data Controller. LGfL have also appointed a DPO who can be reached at dataprotectionenquiries@lgfl.net. The LGfL DPO fulfils a number of roles, one of which is to be the primary and independent point of contact for Data Subjects, namely you. The preferred mechanism for Data Subjects to raise concerns regarding the processing of their personal data by LGfL is to contact your school as they are the Data Controller. If you wish to contact LGfL, please email or send a letter to our contact details above, at which point the enquiry will be forwarded to the DPO of your school.

Purpose of Processing Personal Data. We collect personal data on this website to provide schools with information and tools related to their LGfL subscription and its included products and services. This includes for the purpose of:

- **Identity and Access Management:** To check whether a user has permission to access the Assemble service and what aspects of the service the user can access.
- **Dashboard Provision:** To generate and present de-personalised overviews of key school data within Assemble.

Lawful Basis of Processing Personal Data When Visiting This Website. The lawful basis of processing your personal data when using LGfL Assemble is assessed to be Legitimate Interest, or what is reasonable to expect or, “processing is necessary

for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.”

Categories of Personal Data Processed by LGfL. The information collected and processed for Assemble is:

- First name
- Surname
- Unique reference numbers including student Unique Pupil Number (UPN)
- Email address and telephone number
- School name and the corresponding Local Authority or Multi Academy Trust affiliation
- Your role at your school, identified as ‘student’ or ‘staff’
- Attendance information for staff and pupils
- Student English as an additional language, pupil premium and special educational needs (SEN) status
- Class, subject and year group information.

Typically, LGfL Assemble leverages connections with [Wonde](#) to collect the aforementioned data. Wonde retrieves this information from school Management Information Systems (MIS). You can refer to Wonde's privacy policy [here](#).

LGfL Assemble also utilises Google and Microsoft API Services for authentication purposes. The Google and Microsoft Privacy Policies can be referenced [here](#) and [here](#).

Category of Recipients of Personal Data. LGfL acts as a Data Processor under the instruction of schools to enable them to deliver education services. Data is shared with the Data Controllers in accordance with their requirements.

Transfer of Personal Data Outside the EEA (European Economic Area). There is no personal data involved in Assemble specifically transferred outside the EEA.

Sensitive Personal Data. We will never collect sensitive personal data about you without your explicit consent or under the relevant lawful purpose.

Sale or Passing of Personal Data to Third Parties. We will not sell or pass your personal data to any company. However, to support Safeguarding or Law Enforcement investigation LGfL may be required to pass personal data collected through Assemble outside normal processes, for very specific and limited purposes.

Retention of Personal Data. The data collected to support LGfL Assemble is retained for 1 year after the customer no longer holds an LGfL subscription. Concerning data associated with individuals, deletion takes place immediately upon manual removal through Assemble or following a Wonde sync when the individual is marked as having left in a school's Management Information System. Customer data is synchronised every evening where any changes made would be updated in the system.

Data Subject's Rights. Under data protection legislation you have a number of Rights which we have outlined below:

- **Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is best achieved through submitting a Subject Access Request (SAR) to the Data Controller, which is your school. LGfL and SchoolVue will support the relevant Data Controller. In summary, Data Subject's (you) have the right to obtain:
 - Confirmation that your data is being processed;
 - Access to your personal data (a copy); and
 - Other supplementary information, which corresponds to the information in this Privacy Notice.

- **Fees and Timings.** This information will be provided to you without charge; without delay and within one month. If an extension is required you will be informed of this by the Data Controller. If requests are considered manifestly unfounded or excessive, in particular because they are repetitive, Data Controllers may choose to:

- Charge a reasonable fee taking into account the administrative costs of providing the information; or
- Refuse to respond.

The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) <https://ico.org.uk> will be highlighted.

- **Identify Verification.** To protect your personal data, the Data Controller, or LGfL and SchoolVue on their instruction, will seek to verify your identity before releasing any information, which will normally be in electronic format.
- **Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. If any data held about you is inaccurate or incomplete, the Data Controller (your school), supported by LGfL and SchoolVue, will respond within one month of your request. In the unlikely event the respective Data Controller does not act on the request for rectification, they should inform you of your rights to complain or seek judicial remedy.
- **Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten.*' However, you do have a right to have personal data erased and to prevent processing in specific circumstances:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
 - When you withdraw consent (and this is the basis of processing);
 - When you object to the processing and there is no overriding legitimate interest for continuing the processing;
 - The personal data was unlawfully processed;
 - The personal data has to be erased in order to comply with a legal obligation; and
 - The personal data is processed in relation to the offer of information society services to a child.

- **Right to Restrict Processing.** When processing is restricted, LGfL and its sub processor SchoolVue, upon instruction from the respective Data Controller, are permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you by the Data Controller.
- **Right to Data Portability.** You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:
 - To personal data you have provided to LGfL;
 - Where the processing is based on your consent or for the performance of a contract; and
 - When processing is carried out by automated means.

In these circumstances LGfL, supported by their sub processor SchoolVue, under the instruction of the Data Controller, will provide a copy of your data to the Data Controller in CSV format free of charge, without undue delay and within one month. If there is a delay to this, you will be informed by the Data Controller.

- **Right to Object.** You have the Right to Object to:
 - Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - Direct marketing (including profiling); and
 - Processing for purposes of scientific/historical research and statistics.
- **Automated Decision Making and Profiling.** LGfL and its sub processor SchoolVue, do not employ any automated decision-making or conduct profiling of Data Subjects.

Cookies. This section outlines the type of cookies we apply to LGfL Assemble. By using the website, you agree your personal information will be handled as described in this Privacy Notice. The cookies we may use on our website are described as below:

- **Strictly Necessary Cookies.** These are cookies that allow you to use different parts of our website. Without them different features that you have requested cannot be provided. These are usually set in response to an action performed by the user like clicking on a link or failing to enter the correct password to your account.
- **Functional Cookies.** These help us to make your experience within our site more personal. For instance, knowing if you have been on the site before so that messages for new visitors are not displayed to you.
- **First Party Cookies.** These are cookies that are set by our website. And only we can read them.
- **Session Cookies.** These are stored while you browse our site and then deleted once you leave.

- **Persistent Cookies.** These are saved on your computer and won't be deleted when you close the web page. We use these to provide functionality like keeping you logged in when you come back to the site.
- **Performance Cookies.** These help us to track how people are using our site. They help us to know what pages people are using most and how users navigate around the site, we use this information to make informed decision about how we can improve the user experience of our site. The information we get using these cookies is completely anonymous and we will make no attempt to identify you or influence your experience of our site while you are on it.

How Do We Use Your Data? We use the data that we collect about you for the following purposes:

- To provide services related to your account;
- To communicate with you about your use of LGfL Assemble, your account and/or services we offer or make available through LGfL Assemble;
- To respond to any enquiries that you submit to us;
- To operate and improve LGfL Assemble; and
- To better understand how you access and use LGfL Assemble and your account, both on an aggregated and individualised basis, for the purposes of improving LGfL Assemble.