Curriculum for Unity Schools Partnership - Privacy Notice

Purpose, scope and changes

This notice applies to the personal data of prospective, current and former Customer staff who have purchased the Curriculum for Unity Schools Partnership (CUSP) product under the Unity Schools Curriculum Terms of Service. It describes how we collect and use personal data in accordance with applicable data protection legislation. It also explains our lawful bases for using personal data, the legal rights individuals have over the way it is used, and how to make a complaint.

We may amend, update or supplement it from time to time. We will circulate any new version when it is adopted should it contain substantial changes.

Who we are

Unity Schools Partnership ("we", "us", "our") is a charitable company limited by guarantee and registered in England and Wales with company number 07400398. Our registered office is at Unity SP Offices, Park Road, Haverhill, Suffolk, CB9 7YD. For the purposes of applicable data protection legislation we are the data controller of the personal data contemplated by this privacy notice.

Data protection principles

All personal information we process will be:

- 1. Used lawfully, fairly and in a transparent way
- 2. Used only if necessary for valid purposes that we have clearly explained to you
- 3. Relevant and limited to the purposes we have told you about
- 4. Accurate and kept up to date
- 5. Kept only as long as necessary
- 6. Kept securely

The types of personal data we process

We may process the following personal data under the CUSP offering:

- Staff personal identifiers such as first initial and surname
- Staff contact details, such as staff email address
- Student personal identifiers, such as first initial and surname
- Student education-related information, such as year group, class name, admission details
- Financial transactions details where those include personal data
- Data from contact forms
- · Contents of emails

We will not process any special categories of personal data in relation to the CUSP product offering.

How we collect personal data

We will mainly collect personal data throughout the process of licensing the CUSP product.

How we use personal data

We will use the personal data we collect most commonly in the following circumstances:

- Where it is necessary for our legitimate interests such as administering the CUSP offering
- Where we need to comply with a legal obligation

We may also use personal data in the following situations, which are likely to be rare:

• Where it is needed in the public interest or for official purposes (for example sharing your personal data with a public authority, or following a court order).

Automated decision-making

We will not make decisions that will have a significant impact on individuals based solely on automated decision-making.

Data sharing

We may share some of the personal data we collect as part of providing the CUSP product with third parties, such as government departments, bodies and agencies, law enforcement, regulators, professional advisers and third-party service providers.

We will share your personal information with third parties where required by law or where we or a third party have a legitimate interest in this sharing.

Any third-party service providers we share personal data with are required to take appropriate security measures to protect it in line with our policies. We do not allow third-party service providers to use personal data for their own purposes unless they are required to do so by law. We only permit them to use personal data for specified purposes and in accordance with our instructions.

Transferring personal data outside the UK

We do not transfer the personal data collected outside the UK and EEA.

Data security

We have appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Personal data is only accessed on a need to know basis and solely under our instructions and subject to a duty of confidentiality.

How long we keep personal data for

We will only retain personal data for as long as necessary to fulfil the purposes for which we collected it, including for satisfying any legal, accounting or reporting requirements. In order to determine the appropriate retention period for personal data, we consider:

- The amount, nature and sensitivity of the personal data;
- The potential risk of harm from its unauthorised use or disclosure;
- The purposes for which we process the data and whether we can achieve those purposes through other means
- The applicable legal requirements, e.g. any statutory periods requiring us to keep data for a specific period of time.

- Whether the relevant school is no longer a member of Unity Schools Partnership or no longer wishes to participate as a purchaser of the CUSP product.

Individuals' rights in connection with personal information

Under certain circumstances, by law individuals have the rights to:

Request access to their personal data;

Request correction of their personal data;

Request erasure of their personal data;

Object to processing of their personal information where we are relying on a legitimate interest (or those of a third party);

Request the restriction of processing of their personal information;

Request the transfer of their personal information to another party in certain circumstances.

Individuals can exercise their data protection rights by contacting Michael Vaughan at mvaughan@unitysp.co.uk.

No fee usually required

Individuals will not normally have to pay a fee to exercise any of their rights. However, we may charge a reasonable fee or refuse to comply with access requests which are manifestly unfounded or excessive or in other limited circumstances.

Complaints

Individuals may raise any issues with us in the first instance our DPO (Michael Vaughan - mvaughan@unitysp.co.uk). Complaints may also be raised with the Information Commissioner's Office at https://ico.org.uk/make-a-complaint/ and judicial remedies may be pursued in the courts.