

# VLE Support Ltd Privacy Policy

## **Our contact details**

Name: VLE Support Ltd

Address: TMS House, Cray Avenue, Orpington, Kent BR5 3QB

Phone Number: 01689 885068

E-mail: [info@vlesupport.co.uk](mailto:info@vlesupport.co.uk)

## **The type of personal information we collect**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes: first name, last name, relationship with the student (e.g mother, father), job role in relation to the student (e.g Course Leader)

Contact Data includes: email address, mobile phone number.

We also may, collect, create, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Any comments inputted by the user, e.g to explain why they are absent, will be shared with staff members from the educational institution that the student belongs to. It is possible that comments may include health information (therefore Special Category Data) however we do not request

to collect such data, and such data is not collected in any formalised manner.

## **How we get the personal information and why we have it**

We obtain some personal information, such as first name, last name and phone number, from the educational institution which users are associated with, and who have purchased the licence for the software application. The educational institution will have obtained the software user's consent to share their data with third-party software providers such as ourselves.

Further to this, personal information we process is provided to us directly by you through a direct interaction on our mobile phone application. You may choose to disclose a reason to explain your absence or late arrival, however this is not obligatory within the software application and can be left as a blank field.

We will not share this information with any third parties, other than the educational institution which users are associated with, and who have purchased the licence for the software application.

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting VLE Support Ltd, TMS House, Cray Avenue, Orpington, Kent BR5 3QB.

(b) Contractual. We are fulfilling a contractual obligation to provide a service which includes the use of our software application, to the educational institution which users are associated with.

## **How we store your personal information**

Your information is securely stored on our secure servers within the EEA and / or within other third-party web-based software, which we ensure are fully GDPR compliant. VLE Support are certified as compliant with Cyber Essentials practices and therefore ensure high levels of data security.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data: see 'Your data protection rights' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Should you wish to exercise any of your data protection rights, you should in the first instance contact the data controller (ie the educational institution to whom you have provided the personal data). The data controller will then liaise directly with VLE Support (the data processor) in order to action your data request, subject to the approval of the data controller.

If you make a request, your data controller will have one month to respond to you.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at VLE Support Ltd, TMS House, Cray Avenue, Orpington, Kent BR5 3QB.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>