

# EqualiTeach Privacy Policy

This privacy policy sets out how EqualiTeach uses and protects any information that clients give us when interacting with EqualiTeach's products and services.

EqualiTeach is committed to ensuring that clients' privacy is protected. Should EqualiTeach ask clients to provide certain information by which they can be identified, it will only be used in accordance with this privacy policy.

## When does EqualiTeach collect information?

Collecting information allows us to keep in touch with clients throughout the registration and contract servicing processes. It helps EqualiTeach to operate as effectively as possible and to make sure interactions with clients are timely, relevant and tailored.

EqualiTeach may collect personal and other information at the following times:

1. During the sales/enquiry process
2. During the booking process
3. During the invoicing process
4. During visits to EqualiTeach's website pages. We work with Google Tag Manager and Google Analytics who, through cookies, track clients' experience with our website including where they came from, what they did whilst using our website and where they went after our webpage.

## What information does EqualiTeach collect?

EqualiTeach may collect the following information:

- Identity data including first name, last name, username or similar identifier, marital status, employer/school names and job title/role.
- Contact data including billing address, delivery address, email address and telephone numbers
- Financial data including bank account and payment details.
- Transaction data including details about payments to and from clients and other details of products and services clients have purchased from us.
- Usage data including information about how clients use our website and products and services.
- Marketing and Communications data including clients' preferences in receiving marketing from us and your communication preferences.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated data could be derived from clients' personal data but is not considered personal data in law as this data will not directly or indirectly reveal their identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated data with personal data so that it can directly or indirectly identify clients, we treat the combined data as personal data which will be used in accordance with this privacy policy.
- We do not collect any Special Categories of Personal Data about clients (this includes details about ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about

health, and genetic and biometric data.) Nor do we collect any information about criminal convictions and offences.

- Where we need to collect personal data by law, or under the terms of a contract we have with clients, and clients fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with them. In this case, we may have to cancel a product or service they have with us. We will notify clients if this is the case at the time.

## How does EqualiTeach use clients' information?

EqualiTeach only ever uses clients' personal data with their consent in order to:

- Enter into, or perform, a contract with them
- Comply with a legal duty

In the event of a change of contact details, a change of contact preferences or a decision to opt-out of marketing material, clients should notify EqualiTeach by email or in writing so that our records are up to date. Clients can also use the unsubscribe link in any marketing email from EqualiTeach.

Below outlines some of the different ways EqualiTeach uses data for different areas of their work.

For administration purposes

- To keep a record of the relationship between EqualiTeach and each client
- To contact clients when they have requested information about the products and services EqualiTeach provides, have requested help, have a general enquiry or would like to register for a service.
- To invoice clients.

For direct marketing purposes

- To share training opportunities, resources, newsletters and other information.
- To analyse and improve services, products and information.
- To understand clients better and target potential clients.
- To reach potential clients on social media.

## How does EqualiTeach keep clients' information safe?

EqualiTeach makes sure that appropriate physical, technical and human controls are in place to ensure good care of clients' information is taken.

Data is saved in online password protected client relationship management software and in spreadsheets used for monitoring, promotions and marketing, to which all staff members who service clients have access. Hard copies of customer data will be destroyed using a cross-cut shredder.

Data is saved online in online accounting software accessible only to the senior management team and business development team. Downloaded invoices are saved in an invitation-only SharePoint folder and paid invoices are only accessible to the senior management team in a separate SharePoint folder.

Emails containing client data are permanently deleted from staff inboxes once they no longer serve a purpose/the data has been transferred to the relevant files. Emails containing personal data will never be forwarded to other EqualiTeach staff members not involved with that client's service, other external clients or to personal email addresses.

Email addresses of clients saved on Outlook are accessible only on password protected and encrypted computers and mobile devices.

However, transmission of information over the internet is never completely secure and as a result, while EqualiTeach strives to protect clients' personal information, EqualiTeach cannot guarantee the security of any information transmitted and clients do so at their own risk. Once EqualiTeach receives clients' data, every effort is made to ensure its security both on EqualiTeach' systems and while in transit between systems.

All staff who have access to clients' personal data understand the importance of keeping information safe and secure at all times and are given training to support them in this.

EqualiTeach is not responsible for the privacy policies and practices of other organisations even if they are accessed using links in content from EqualiTeach's products. EqualiTeach recommends that clients check the policy of each organisation visited.

EqualiTeach ensures that additional controls are in place for financial, sensitive and special categories of information, meeting regulatory and legal requirements for managing these types of information.

## How long does EqualiTeach keep information for?

EqualiTeach only uses and stores information for as long as it is required for the purposes it was collected for and in line with the General Data Protection Regulations.

Clients' personal information will be kept for seven years from the last interaction with EqualiTeach.

Data anonymised for analysis purposes will be kept indefinitely.

## Subject Access Requests

Individuals have the right to request via email the following:

- Confirmation that their data is being processed
- Access to their personal data, and
- Other supplementary information

In most circumstances, EqualiTeach will provide the information requested free of charge. EqualiTeach will charge a fee based on the administrative cost of providing the information when a request is manifestly unfounded, excessive or repetitive.

Information will be provided without delay and within a month. Where requests are complex or numerous, EqualiTeach will extend the deadline to three months. However, EqualiTeach will respond to the request within a month to explain why the extension is necessary.

For more information, please see EqualiTeach's Subject Access Request Procedure.

## Requests for the Deletion of Client Data

GDPR gives individuals the right to ask for their data to be deleted and EqualiTeach has an obligation to do so, except in the following circumstances:

- The personal data is needed to exercise the right of freedom of expression.
- There is a legal obligation to keep that data.
- For reasons of public interest (for example, public health, scientific, statistical or historical research purposes.)

Data collected from minors must be deleted.

Data can be kept if it has undergone an appropriate process of anonymisation.

## Newsletter Sign Up Data

When clients and potential clients sign up to EqualiTeach's quarterly newsletter, the following data is collected.

- Name of contact
- Email address of contact
- Name of contact's school/organisation

Name of contact and email address of contact is saved in Excel spreadsheets in a password protected SharePoint folder, accessible only to the senior management team and the member of staff responsible for data entry and uploading. Excel spreadsheets are deleted once they no longer serve a purpose. The data is uploaded to Mailjet software, which is used to automatically send out newsletters.

Mailjet software is password protected.

## Third Parties

In accordance with General Data Protection Regulations, EqualiTeach will not sell, distribute or lease clients' personal information to third parties unless required to do so by law.

## Website Cookies

EqualiTeach's websites (the main website, the Equalities Award website, the e-learning website and the Empowered website) use cookies. This information can be used to track clients' sessions on each site. Cookies may also be used to customise websites for individual clients. If clients use a common internet web browser, they can set up their browser to either let them know when they receive a cookie or to

deny cookie access to their computer. We work with Google Analytics who may also, through cookies, track clients' experience with our websites including where clients came from, what clients did whilst using the websites and where clients went after landing on webpages.

## Changes to this Privacy Policy

EqualiTeach may change this privacy policy at any time, in which case the amended privacy policy will be posted on the EqualiTeach website and will apply from the date posted, with the exception of any services ordered prior to the posting of the new privacy policy. Clients should check this privacy policy on each occasion they purchase from EqualiTeach as they will be bound by the latest privacy policy.

## Contact Information

For more information about this policy or to make a complaint, please contact Kate Hollinshead [kate@equaliteach.co.uk](mailto:kate@equaliteach.co.uk) 01480 470 660.