

# Data Privacy Policy

<b>Policy Owner</b>	Robert Roulston
<b>Policy Approver(s)</b>	Kieran McGlade.
<b>Related Policies</b>	NA.
<b>Related Procedures</b>	NA
<b>Storage Location</b>	Causeway / Policies
<b>Effective Date</b>	13/6/2020
<b>Next Review Date</b>	1/5/2021

## Purpose

The purpose of this policy is to provide staff and others working for Inish Education Technology with clear guidance on the appropriate, safe, and legal way in which they can make use of personal information belonging to Customers and to **Inish Education Technology**. Anybody working for the Company need to be aware of the compliance required with this policy and **Inish Education Technology's** commitment to comply with the companies Security Operations Policy.

## Scope

### The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and email contact details) for course authors and course learners.
- Learners' responses and scores relating to online learning performance as part of a tuition programme.

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

Most of the personal information we process is provided to us directly by customers for one of the following reasons:

- To facilitate the creation of online learning courses
- To provide the Customer Institution with Learner scores and performance data (if applicable) when they complete a learning package,

We also receive personal information indirectly, from the following sources in the following scenarios:

- From Causeway site administrators at individual Institutions Institution to enable accounts to be created for Course Authors
- From learners when they add their data as part of their participation in a learning package for the purposes of submitting their performance data and obtaining feedback. [

We use the information that Customers give us in order to contact Users with help and advice when problems arise.

We store this information and supply this back to your institution.

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

(a) Customer consent. Customers are able to remove consent at any time. They can do this by contacting their Institution's Causeway Administrator available on the Institutions web site.

(b) We have a contractual obligation.

## **How we store Customers' personal information**

Customer information is securely stored on Inish Education Servers hosted within Digital Oceans server farm located in the UK.

We keep Name, email address, course marks for the duration of the contract with the Customer institution We will then dispose of customer information by erasing all personal data from our data stores and deleting all security backups. Archive of student performance data will be transmitted to the customer on requested by means of a spreadsheet after which all student data will be erased from our servers.

## **Customer data protection rights**

Under data protection law, Customers have rights including:

**Right of access** - Customers have the right to ask us for copies of their personal information.

**Right to rectification** - Customers have the right to ask us to rectify personal information they think is inaccurate. They also have the right to ask us to complete information they think is incomplete.

**Right to erasure** - Customers have the right to ask us to erase personal information in certain circumstances.

**Right to restriction of processing** - Customers have the right to ask us to restrict the processing of their personal information in certain circumstances.

**Right to object to processing** - Customers have the the right to object to the processing of their personal information in certain circumstances.

**Right to data portability** - Customers have the right to ask that we transfer the personal information given us to another organisation, or to them, in certain circumstances.

Customers are not required to pay any charge for exercising their rights. We have one month to respond to such requests.

Customers should contact us at [info@inishedtech.com](mailto:info@inishedtech.com) if they wish to make a request as set out in this policy.

## **How to complain**

If Customers have any concerns about our use of personal information, they can make a complaint to us at:

### **Inish Education Technology Ltd**

#### **Our contact details**

Name: Robert Roulston (Data Controller)

Address: 6 Ogles Grove

Phone Number:07816477843

E-mail: [info@](mailto:info@)

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>

## Revision History

Version ID	Date of Change	Author	Rationale