

## DATA PROTECTION STATEMENT

New Media Learning Ltd was formed in 2002 and has many years' experience of develop computer software for schools. New Media Learning Ltd is a company registered in England with company number: 4373179. New Media Learning Ltd is registered with the Information Commissioners Office with ref no: Z9896584

The EU General Data Protection Regulation (GDPR) is a significant piece of European legislation which will come into force in 2018. It builds on existing data protection laws, strengthening the rights that EU individuals have over their personal data, and creating a single data protection approach across Europe.

### How will New Media Learning Ltd comply with the GDPR?

New Media Learning Ltd is reviewing all the internal processes, procedures, data systems and documentation to ensure that we will be compliant with the GDPR.

Our GDPR Principles are:

- Data is processed fairly and lawfully
- Data is processed only for specified and lawful purposes
- Processed data is adequate, relevant and not excessive
- Processed data is accurate and, where necessary, kept up to date
- Data is not kept longer than necessary
- Data is processed in accordance with an individual's consent and rights
- Data is kept secure
- Data is not transferred to countries outside of the European Economic Area ('EEA') without adequate Protection

### What personal information do we collect?

New Media Learning Ltd. collects contact information ("Subscription Details") which schools voluntarily provide to us when they place and order for a licence for our products This information is limited to: *Name of institution, address of institution, a contact name, job title, email address*. A school may also decide to provide contact details for a finance contact person, the data manager, and any persons who wish to receive our newsletter. New Media Learning Ltd holds this information on file for the duration of the licence period plus three years, as is necessary for accounting purposes. After this time this information is then deleted.

Our business as a company is to sell software to schools which allows a school to store sensitive information within the software. However, New Media Learning Ltd. does not have access to the information which a school may decide to enter into the Software. The Software and the information which schools might enter into it resides on the school's network and remains under the control of those persons whom the school nominates as administrators of the system. It will be for schools themselves to ensure that their procedures and policies with respect to this data meet the requirements of the GDPR.

### How do we use personal information?

New Media Learning uses the Subscription Details provided voluntarily to us to contact the named person(s) in the school to inform them when their licence needs renewing, or when an update has been prepared, or to send a newsletter if the school has opted for this.

No personal or contact information will be passed on to any other person or organization without the permission of that person, or unless we are required by law. An exception to this is that we are sometimes asked by schools to supply the names of other schools in their area which use the Software. It is our policy to provide a list of schools with a similar postcode at our discretion, but not to pass on contact details. We ask potential users to note established courtesies should they wish to make an approach to another school.

Banking information details made available to us during the course of a purchase will be kept confidential by us and not passed on to any other person or organisation. This information is regarded as restricted and it can only be accessed by persons within the Company authorised to process such information.

Your subscription details are kept on file for the duration of the Licence. On termination of the Licence we will continue to store this information for a period of three years for accounting purposes. Once this time has elapsed the contact details will be erased from our systems. We will however keep a record on file for as long as we require of the fact that your Institution had held a licence for the Software. This record will not contain any information other than the name of the Institution and the dates of the Licence Period.

Invoices issued by us to you are kept on file for period of three years from the end of the Licence period to meet accounting requirements. At all times your information will remain confidential.

Users of the Software may enter information into the Software which falls into the category of 'sensitive' information. Sensitive data may include information about the pupils of an Institution, or information about the employees of the Institution.

The Software maintains the confidentiality of this data by requiring users to log into the Software using identifying information supplied by the school to its employees. The Software runs across a school network and operates within the security provided by the school's policy and practice regarding information held on the school network.

Associates, employees and contractors of New Media Learning Ltd do not have access to the sensitive data which resides inside the Software when it is in use within an Institution. Under most circumstances there will be no occasion or need for our associates or employees to view a school's data. There are possible exceptions to this. A school may request our technical staff to view a school's computer screen in order to find a solution to a technical problem; or an associate might incidentally view a school's data when providing training for an Institution. In exceptional circumstances when we cannot resolve a technical issue via remote support an Institution may provide us with a copy of their database to test. The database will be received by us in an encrypted form. The database will only be used for the testing period and then erased from our system. Our policy in such situations is:

- a. when a school sends data to us for testing we will request that all references to personal information are first anonymised, and;
- b. if we need to investigate a fault requiring a complete database we will ensure that it is sent to us encrypted. It is our policy not to view the data in investigating a fault in a database beyond that which is necessary to find and repair the fault, and;
- c. to erase all data which is the property of an institution once a fault has been found and repaired, and;
- d. to disregard all data that we may view on screen in the course of training or in the course of providing support or while investigating faults.

Users of the Software may disclose information to us during the course of our work which may fall into the category of 'sensitive' information. Sensitive data may include information about the pupils of an Institution, or information about the employees of the Institution. Information deemed as 'sensitive' will be disregarded and no record will be made of it.

We provide technical support to users of the Software by responding to information about technical issues which users notify us about. Information about the technical issue which is the subject of each enquiry may be anonymised, summarised and added to our Knowledge Base so that other users of the Software can read and benefit from this information.

### **Where do we store your personal data?**

The Subscription Details that we collect are stored in our secure company database under password control. It is only accessible to authorised personnel in order to fulfil our obligations under the licence. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with our data protection policy.

### **Personal data and your rights**

You have a number of rights surrounding your information that we hold.

These rights include access to your data, having inaccuracies corrected, and having information erased. If you wish to exercise any of these rights as an authorised representative of your school, please contact us using this email address [info@4matrix.com](mailto:info@4matrix.com)