

### 1. Introduction

Please read this Privacy Notice carefully. It applies to employees of organisations (“**Third-Party Partner**”) receiving education network services from Novus (“**Novus Education Network**”).

### 2. What is the purpose of this document?

The LTE Group, of which Novus is an operating division (“**we**”, “**our**”, “**us**”), is committed to protecting the privacy and security of your personal information (“**personal data**”). This Privacy Notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the “**GDPR**”), together with other UK data protection laws.

**More information can be found at:** <https://www.ltegroup.co.uk/dataprotection/>. **You can also contact our Data Protection team at** [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk) **if you have any questions regarding this document.**

It is important that you read this Privacy Notice, together with the **Third-Party Partnership Agreement** and **Acceptable Use Policy**, so that you are aware of how and why we are using your personal data and what your legal rights are in relation to it.

### 3. The kind of information we hold about you

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).

In our capacity as a data processor, we will process your personal data (name, email address) in order to set up a network account and allow you access to the Novus Education Network.

### 4. How is your personal information collected?

This data will typically be provided to us by your employer (Third-Party Partner).

### 5. How will we use information about you?

Overall, we use your personal data to provide you with access to Novus services.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a “lawful basis” for the processing.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent, where this is required or permitted by law.

- Where we need to perform a **contract** we are about to enter into, or have entered into with you;
- Where we need to comply with a **legal obligation**

## **Do we need your consent?**

We do not generally process your personal data based on your consent (as we can usually rely on another lawful basis). If we do process your personal information based on your consent, we will inform you of this before we start the processing and you will have the right to withdraw your consent at any time.

## **6. Change of purpose**

We will only use your personal information for the purposes which we collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

## **7. If information is not provided**

If you do not provide personal information, we may not be able to provide you with access to our services, or we may be prevented from complying with our legal or contractual obligations.

## **8. Automated decision-making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not intend to take any decisions about you in this way. We will notify you in writing if this changes.

## **9. Data sharing**

We will only disclose information to third parties under the following circumstances:

- if we employ companies and individuals to perform functions on our behalf, we may need to disclose personal information to these parties for the performance of the purposes set out in this Privacy Policy
- if we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings, or to protect the rights, property, or safety of us, our users or others.

A full register of who we may share your personal data with and why is available upon request from [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

## **10. Data security**

We have implemented appropriate policies, procedures and technical measures, to ensure the security of the personal information we collect, use, and maintain. Our objective is to maintain the confidentiality, integrity and availability of such information. The security practices adopted and implemented by our Information Services department have been externally certified to ensure achievement against and in accordance with the ISO27001 Standard. This accreditation is maintained and externally audited on an annual basis.

Your data will be stored in the UK only.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

## **11. Data retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. Details of retention periods for different aspects of your personal information

are available in our **Data Retention Policy** and **Data Retention Schedule** which are available upon request from [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

Once we no longer require access to your personal information we will retain and securely destroy it in accordance with our data retention policy and applicable laws and regulations. We will typically destroy your data in any of the following circumstances:

- 30 days after the end of our contract to provide education network services to your employer (Third-Party Partner)
- 30 days after you/your employer requests that your user account is deleted

## 12. Your individual rights in connection with personal data

Under certain circumstances, by law, you have the right to request:

- **Access** to your personal information
- **Correction** of the personal information we hold about you if it is inaccurate
- **Erasure** of your personal information. We can only do this in certain circumstances.
- **Restriction** of processing of your personal information
- **Transfer** of your personal information to another party
- **Objection** to processing of your personal information
- **Suspension** of processing of your personal information

If you wish to invoke any of the above rights please contact us via email at:

[dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

## 13. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

**The Company Secretary & General Counsel**

LTE Group  
Whitworth House  
Ashton Old Road  
Manchester  
M11 2WH

Email: [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

Further information is available on the ICO website, or via the telephone:

<https://ico.org.uk/global/contact-us/>  
0303 123 1113

More information on the ICO's complaint procedure can be accessed at:

<https://ico.org.uk/make-a-complaint/>