

Privacy Notice – PEF Third Party Partners

1. Introduction

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

2. What is the purpose of this document?

LTE Group (a statutory corporation and exempt charity for the purposes of the Charities Act 2011) of which Novus is an operating division (“**We**”, “**Our**”, “**Us**”) are committed to protecting the privacy and security of your personal information. This data protection 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/privacy-foi/> You can also contact our Data Protection Officer at dpo@ltegroup.co.uk if you have any questions regarding this document.

For the purposes of this document we are a “data processor” This means that we process your personal information under a contractual agreement with a “data controller” (MoJ/PEF Third Party Partners). Whether we are acting as a data controller, processor, or joint controller, we are responsible for ensuring your data is handled in a secure way, and we have included in this document all the privacy information that you should be aware of.

Under data protection legislation, we are required to notify you of the information contained in this document. This Privacy Notice, together with the **Third-Party Partnership Agreement** and **Acceptable Use Policy**, sets out the basis on which any personal data we collect from you, or provided by you, will be processed by us.

3. The kind of information we hold

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

4. How we use information

We may use your personal information as follows:

- 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**

5. Change of purpose

We will only use your personal information for the purposes for which we collected it, 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 we will explain the legal basis which allows us to do so.

6. 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.

We will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

A full register of who we may share your personal data with and why is available on request: dpo@ltegroup.co.uk

7. 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 information. The security practices adopted and implemented by our Information Services department have been externally certified to ISO27001. This accreditation is maintained and externally audited on an annual basis.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

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.

Data is exclusively stored within the UK.

8. 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 is available on request from 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 (PEF Third-Party Partner)
- 30 days after you/your employer requests that your user account is deleted

9. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

10. Your individual rights in connection with personal information

By law, you have certain individual rights in relation to any personal data of yours that we process. If you wish to invoke any of the above rights please contact us via email: dpo@ltegroup.co.uk.

11. 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

Executive Suite
LTE Group
Ashton Old Road
Manchester
M11 2WH

If you do not wish to discuss this 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). This can be done through live chat on the ICO website, or via the telephone:

www.ico.org.uk/livechat

0303 123 1113

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

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