

Contact Group – Tell By Text Privacy Policy

At the Contact Group, we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about people who visit the website, <http://www.tellbytext.com>, use the SMS or telephone IVR service. It also explains how we use it and the conditions on how we may disclose this to others. Finally it outlines how we keep any supplied information secure.

We may change this policy from time to time, and it is recommended that you occasionally read and check any changes that occur. By using Tell by Text you are agreeing to be bound by this policy.

For more information regarding this policy and our privacy practices please contact dpo@the-contactgroup.com, or writing to Truancy Call Ltd, 5th Floor, Lyndon House, 58-62 Hagley Road, Birmingham, B16 8PE or phoning 03333 131415.

Who are we?

Contact Group is a leading provider of best in class communication and data services in the education sector. Our range of solutions cover mass messaging, online payments, personalised schools app, attendance management, anti-bullying system and Looked-after Children. We are a company incorporated in England and Wales under Company Number 4125665. We work with around 3000 education establishments in the UK.

How do we collect information from you?

We obtain information about you when you use our website, sms or phone service. For example, when you contact us to use the Tell By Text service. Our products may also collect information from your School Management Systems that we may use to contact you regarding additional services we offer.

What type of information is collected from you?

The personal information we may collect includes your name, address, email address, phone number, and information regarding what pages are accessed and when. We also collect audio recordings from phone calls, SMS messages from our text message service and images via user upload on our web service.

We also collect descriptions of safeguarding incidents or concerns that have been reported by a user.

How is your information used?

Tell by text will collect information from you for safeguarding purposes only. This will be shared directly with an appropriate party in the organisation that has decided to use the Tell By Text service. This information may be used as evidence where it is deemed necessary, if a serious safeguarding issue has been uncovered. On occasion this evidence may be shared with the appropriate authority, such as Social Services or Police. This information is only shared if there is a legitimate reason to. This will be shared by the organisation who have put Tell By Text in place and not Contact Group. It is at the organisations discretion how they choose to act on the information that you share with them.

We may use your information to:

- Process requests that you have submitted
- To carry out our obligations arising from any contracts entered into by you and us
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Send you communications to further discuss any safeguarding concerns you have
- Improve our products

Retention and Deletion

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Any request submitted via Tell By Text will only be readable by the organisation who it has been submitted to and the Contact Group. We will only ever have need to access this data if there is a technical issue, subject access request or a request for removal has been made.

Third Party Service Providers working on our behalf:

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process messages and communications sent to you).

However, when we use third party service providers for further processing, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about how we can improve parental engagement and other related activities that our exciting products and services, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have

indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: dpo@the-contactgroup.com or telephone on 03333 131415.

How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: dpo@the-contactgroup.com. Alternatively, you can telephone 03333 131415.

You have the right to ask for a copy of the information, the Contact Group hold about you.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear next to the address bar at the top of popular browsers such as Microsoft Edge and Google Chrome.

While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We may analyse your personal information to create a profile of your concerns or locations that incidents occur. We do this to support organisations in enhancing their safeguarding.

Use of 'cookies'

Like many other websites, the Contact Group website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Transferring your information outside the UK and European Union (EU)

Some of our processing does use services which may operate outside the UK and the EU. For example we use JIRA Service Desk to manage any support incidents and queries from our customers. Data protection laws may not be equivalent in countries outside the UK and EU. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in May 2018.