

The National Association of School-Based Teacher Trainers

THE NATIONAL ASSOCIATION OF SCHOOL-BASED TEACHER TRAINERS ("NASBTT") PRIVACY POLICY

1. INTRODUCTION

This privacy policy (**Policy**) relates to your personal information in connection with your use of and access to the NASBTT website (www.nasbtt.org.uk) (the **NASBTT Platform**) and any services provided by NASBTT (the NASBTT Platform and services together forming the **NASBTT Services**).

We are committed to protecting your information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us via info@nasbtt.org.uk.

When you use the NASBTT Services, you trust us with your information. We take your privacy very seriously. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue your use of the NASBTT Services.

2. CHANGES TO THIS POLICY OR YOUR PERSONAL INFORMATION

We review this Policy regularly and it is your responsibility to check regularly and determine whether you still agree to comply with the Policy. If you do not agree to any changes to this Policy then you must immediately stop using the NASBTT Services. In the event we make any significant changes to this Policy, we will use our reasonable endeavours to inform you of such changes in advance through our usual member communication channels.

It is important that the personal information we hold about you is true, complete, accurate and current. You must notify us of any changes to your personal information (for example, if you change your email address).

3. ABOUT US

The NASBTT Services are owned and operated by NASBTT, a charity registered in England and Wales with registered charity number 1176171 and whose registered office is situated at The Priory Centre, 63 Newnham Avenue, Bedford, MK41 9QJ ("NASBTT/we/us/our"). NASBTT is the controller (also known as a data controller) and is responsible for your personal information. The term "you" refers to the user wishing to access and/or use the NASBTT Services.

The NASBTT Platform provides a platform designed to represent the interests of schools-led teacher training provision in relation to the development and implementation of national policy developments. NASBTT members can access: opportunities to influence national policy developments; member-only tailored content and resources, including publication libraries, stakeholder resources and useful links; opportunities to discuss and feedback on sector-related matters; opportunities to engage with other NASBTT members; a wide range of CPD opportunities and events; relevant support, advice, guidance, updates and information; an occupational health and widening access support package, NASBTT EMM, NASBTT Learn; legal advice and support; and more. Trainees of NASBTT members can access the Trainee Subject Networks and Trainee Resource Area. In addition, NASBTT offers free access to the NASBTT Teacher Educator and Mentoring Zone (TEMZ) which is available to all Mentors and Teacher Educators.

4. INFORMATION WE MAY COLLECT ABOUT YOU

4.1 Personal information you disclose to us

In Short: We collect personal information that you provide to us including information such as your name, provider address, provider contact information, job title, social media handles and URLs.

We collect personal information that you voluntarily provide to us when registering to use and actually using the NASBTT Services, or otherwise contacting us. The personal information that we collect depends on the context of your interactions, the choices you make and the services and features you use. When you use the NASBTT Services and/or when you otherwise deal with us, we may collect the following information about you (the **Information**):

- Identity Data, which includes first name and last name.
- Contact Data, which means the data we use to contact you including your billing address, delivery address, email address and contact number.
- Financial Data, which means the payment method and card association used to
 process your payments for your orders and membership subscriptions. We do not store
 or process your card details ourselves; they are processed and stored via one of our
 contracted third party service providers. We encrypt your payment card details in your
 browser and securely transfer this data to our relevant third party payment provider to
 process a payment.
- Transaction Data, which means details about transactions you have made using the NASBTT Services including the payments to and from you along with other details of services you have purchased from us.
- Profile Data, which includes your username, email address and login data, details of any purchases or orders made by you, and your interests, preferences, feedback and survey or questionnaire responses.
- Usage Data, which includes information about how you use the NASBTT Services. This includes your browsing patterns and information such as how long you might spend on one of our webpages on the NASBTT Platform and what you look at and for, the page that referred you to the NASBTT Platform and the click stream during your visit to our website, page response times and page interaction information (for example, clicks you make on a page).

- Marketing and Communications Data, which includes your preferences with regards to receiving marketing from us and your other communication preferences.
- Other information relevant to services, surveys, questionnaires and/or offers.

4.2 Information automatically collected

In Short: Some Information – such as IP addresses and/or browser and device characteristics – is collected automatically when you use the NASBTT Platform.

We automatically collect certain Information when you visit, use or navigate the NASBTT Platform. This Information does not reveal your specific identity (unless your device name is the same as your name) but may include device and usage Information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, Information about how and when you use the NASBTT Platform and other technical Information. This Information is primarily needed to maintain the security and operation of the NASBTT Platform, and for our internal analytics and reporting purposes.

Like many businesses, we also collect Information through cookies and similar technologies. You can find out more about this in our Cookies Policy.

5. HOW DO WE USE YOUR INFORMATION?

In Short: We process your Information for purposes based on legitimate business interests, the fulfilment of our membership contract with you (where applicable), compliance with our legal obligations, and/or your consent.

We use your Information collected via the NASBTT Services for a variety of business purposes, as described below. We process your Information for these purposes in reliance on our legitimate business interests (**Business Purposes**), in order to enter into or perform a contract with you (**Contractual Reasons**), with your consent (**Consent**), and/or for compliance with our legal obligations (**Legal Reasons**). We indicate the specific processing grounds we rely on next to each purpose listed below.

We may process your Information for the following purposes:

- Fulfil and manage any orders or subscriptions in connection with the NASBTT Services (Contractual). We may use your Information or pass it onto our brand partners to fulfil and manage your orders, payments, returns, and exchanges.
- To send administrative Information to you for Business Purposes, Legal Reasons and/or possibly Contractual Reasons. We may use your Information to send you product, service and new feature Information and/or Information about changes to our Terms and policies.
- To send you marketing and promotional communications for Business Purposes and/or with your Consent. We and/or our brand partners may use your Information for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails: see below for further details.
- If applicable, to facilitate account creation and the log-in process with your Consent. If you choose to link your account with us to a third party account (such as your Google or Facebook account), we use the Information you allowed us to collect from those

third parties to facilitate account creation and the log-in process. See our <u>Terms</u> for further information.

- To administer promotions for our Business Purposes and/or with your Consent.
- To request feedback for our Business Purposes and/or with your Consent. For example, we may use your Information to request feedback and to contact you about your use of the NASBTT Platform.
- To protect the NASBTT Services for Business Purposes and/or Legal Reasons. We
 may use your Information as part of our efforts to keep the NASBTT Services safe and
 secure (for example, for fraud monitoring and prevention).
- To enforce our <u>Terms</u> and policies for Business Purposes, Legal Reasons and/or possibly Contractual Reasons.
- To respond to legal requests and prevent harm for Legal Reasons. For example, if we
 receive a subpoena or other legal request, we may need to inspect the data we hold
 to determine how to respond.
- We may use your Information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve the NASBTT Services, our products and services, our marketing and your experience.

6. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information to comply with membership-related obligations, fulfil our charitable purposes, or with your consent].

We only share and disclose your Information in the following situations:

- Contractual. We may share Information with brand providers and partners to enable any orders for products or services, or obligations arising out of any such orders, to be fulfilled.
- Compliance with Legal Obligations. We may disclose your Information where we are legally required to do so in order to comply with applicable laws, governmental requests, judicial proceedings, court orders, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests. We may disclose your Information where we believe it is necessary to
 investigate, prevent, or take action regarding potential violations of our policies,
 suspected fraud, illegal activities or situations involving potential threats to the safety
 of any person, or where we believe it is necessary for the purpose of providing
 evidence in litigation in which we are involved.
- Third-Party Service Providers. We may share your Information with third-party vendors, service providers, contractors or agents who perform services and require access to such Information to carry out that work. Examples include: data analysis, email delivery, hosting services, customer service and marketing efforts. They will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential and may not use it other than as we ask them to and always in accordance with this Policy.

- **Business Transfers.** We may share or transfer your Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- Third-Party Advertisers. We may use third-party advertising companies to serve ads
 when you visit the NASBTT Platform. These companies may use Information about
 your visits to the NASBTT Platform and other websites that are contained in web
 cookies and other tracking technologies in order to provide personalised
 advertisements about goods and services that may be of interest to you. See our
 Cookie Policy for further Information.
- Business Partners. Provided you have given us Consent to do so we may share your Information with our business partners to offer you certain products, services or promotions.
- With your Consent. We may disclose your Information for any other purpose with your Consent.

We may disclose aggregated, anonymous Information (i.e. Information from which you cannot be personally identified), or insights based on such anonymous Information, to selected third parties, including (without limitation) analytics and search engine providers, to assist us in the improvement and optimisation of the NASBTT Services. In such circumstances, we will not disclose any Information which can identify you personally.

7. THIRD-PARTY WEBSITES

In Short: We are not responsible for the safety of any Information that you share with third-party providers who feature or advertise, but are not affiliated with, the NASBTT Services.

The NASBTT Platform may feature links to third-party websites or contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Policy.

We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the NASBTT Platform. You should review the policies of such third parties and contact them directly if you have any related questions.

8. FOR HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your Information for as long as necessary to fulfil the purposes outlined in this Policy, unless a longer retention period is required or permitted by law.

We will only keep your Information for as long as necessary to fulfil the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax law, accounting requirements or other legal or regulatory requirements).

When we have no ongoing Business Purpose to justify the processing of your Information, we will either delete or anonymise it, or, if this is not possible (for example, because your Information has been stored in backup archives), then we will securely store your Information and isolate it from any further processing until deletion is possible.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your Information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any Information we process. However, please remember that we cannot guarantee that the Internet itself is 100% secure. Although we will use our reasonable endeavours to protect your Information, transmission of personal Information to and from the NASBTT Platform is at your own risk. You should only access our services within a secure environment.

10. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We take steps to ensure that the NASBTT Services are only used by those over 16 years of age and we do not knowingly collect data from or market to children under 16 years of age.

We do not knowingly solicit data from or market to children under 16 years of age. By using the NASBTT Services, you represent that you are at least 16 years of age. If we learn that Information from users less than 16 years of age has been collected, we will deactivate the relevant account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under 16 years of age, please contact us immediately via info@nasbtt.or.uk.

11. YOUR CONSENT TO PROCESSING

You will be required to give Consent to certain processing activities before we can process your Information. Where applicable, we will seek Consent from you when you first submit Information to or through the NASBTT Services.

If you have previously given your Consent you may freely withdraw such Consent at any time. You can do this by emailing info@nasbtt.org.uk.

If you withdraw your Consent and we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another legal basis for processing your Information, then we may continue to do so subject to your legal rights.

Please note that if we need to process your Information in order for you to use the NASBTT Services and you object or do not provide Consent to us processing your Information, you accept that the NASBTT Services will no longer be available to you.

12. MARKETING AND OPTING OUT

If you have given Consent to marketing we may contact you about our products, services, promotions and special offers. If you no longer wish to receive such Information you can withdraw your Consent at any time by sending an email to info@nasbtt.org.uk or unsubscribing from the communications.

If you have given Consent, we may share your Information with carefully selected third-party organisations and business partners and they may contact you directly. If you would prefer to no longer receive direct marketing communications from third-parties and partners after previously giving your Consent, please contact those third parties and partners directly to withdraw the Consent.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us in connection with your purchase of a product or service or your involvement in other related transactions.

13. ACCOUNT INFORMATION

You may at any time request changes to the Information in your account by emailing info@nasbtt.org.uk.

If you wish to terminate your NASBTT account, please contact us via info@nasbtt.org.uk and we can arrange this for you. Some Information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our <u>Terms</u> and/or comply with legal requirements.

14. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You have certain rights in respect of your Information.

You have certain rights in relation to the Information that we hold about you. Details of these rights and how to exercise them are set out below. Please note we will require evidence of your identity before we are able to respond to any requests. This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further Information in relation to your request to speed up our response. To exercise or discuss any of your rights, please contact us via info@nasbtt.org.uk.

- Right of Access. You have the right at any time to ask us for a copy of the Information that we hold about you and to check that we are lawfully processing it. Where we have good reason, and where data protection law permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reason(s) for doing so.
- Right of Correction or Completion. If Information we hold about you is not accurate or is out of date and requires amendment or correction, you have a right to have the data rectified or completed.
- **Right of Erasure.** In certain circumstances, you have the right to request that the Information we hold about you is erased (for example, if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based only on your Consent and there are no other legal grounds on which we may process the Information).
- Right to Object to or Restrict Processing. In certain circumstances, you have the
 right to object to our processing of your Information (for example, if we are processing
 your Information on the basis of our legitimate interests but there are no longer any
 compelling legitimate grounds to justify our processing overriding your rights and
 interests.

You may also have the right to restrict our use of your Information, for example during a period in which we are verifying the accuracy of your Information in circumstances where you have challenged the accuracy of that Information.

 Right of Data Portability. In certain instances, you have a right to receive the Information that we hold about you in a structured, commonly used and machinereadable format. In such circumstances, you can ask us to transmit your Information to you or directly to a third party organisation on your behalf.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal Information of others without their consent.

If we are relying on Consent to process your Information, you have the right to withdraw your Consent at any time. Please note however that this will not affect the lawfulness of the processing that occurred before the withdrawal of such Consent.

15. CONTACT US

We welcome your feedback and questions on this Policy. If you wish to contact us about this Policy or have any other questions, please email us via info@nasbtt.org.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (the ICO), the UK supervisory authority for data protection issues (https://ico.org.uk/concerns/). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance if you have any queries or grievances.