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Strive for better technologies

## Website Privacy Notice

### Who we are

This website is operated by Plum Innovations Limited (Registered Number 08974389). If you have any concerns regarding your data and privacy you can contact us at [info@pluminnovations.co.uk](mailto:info@pluminnovations.co.uk) or by mail at Unit 17.3 Thames Innovation Centre, 2 Veridion Way, Erith, DA18 4AL

References to the "Company", "we", "us", "our" and "ours" in this privacy policy means Plum Innovations.

### **Purpose of this privacy policy**

The privacy of your data is important. We are committed to the security, privacy and confidentiality of information provided by you or on your behalf to us or which is data that we assist you with through the provision of data processing and/or data storage services. This privacy policy describes our current policies and practices with regard to any personal information collected by us whether from you directly, through the website.

Personal information means any information which identifies you, and may include information such as your name, email address, telephone number and position.

### **How we manage Data Protection compliance**

Having regard to our responsibilities to comply with the General Data Protection Regulation and other applicable laws, we have appointed an appropriate person to oversee and to assure compliance of our business with all data protection and e-privacy rules. That person can be contacted at [info@pluminnovations.co.uk](mailto:info@pluminnovations.co.uk).

## **Notification of changes to our privacy policy**

We are continually improving our methods of communication and adding new functionality and features to this website and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. We encourage you to check this page regularly.

This policy was last updated on 24<sup>th</sup> May 2018.

We have updated this policy to recognise the responsibilities we will have under the General Data Protection Regulation and related UK data protection laws.

## **The Information we collect**

We only hold personal data which is directly relevant to our dealings with or which affect a given data subject and where any processing we may subsequently undertake of that data can be carried out by us lawfully – for example in pursuance of our legitimate interests as explained within this Policy or for purposes relating to the entering into of a contract with an organisation and the subsequent performance of that contract. That data will be held and processed in the way we describe within this Policy.

You may have been directed to this Policy through a weblink we provided you with. We make individuals aware of our policy in relation to our holding and any processing of that person's data at the point of collection of the personal data concerned.

## **How we collect personal information**

We may collect your personal information at the point you make an enquiry of Plum Innovations. This includes any telephone enquiry you may make and enquiries that we receive at trade fairs and in other marketing activities we conduct. We will only take your information on a basis that entitles us to thereafter hold and use that personal data with an express consent provided by you to us holding the data and for each purpose that we then intend to use that data.

We collect and hold personal information concerning users of our products and services where an enquiry or request for assistance has been made to our helpdesk. We will request the full name and email address of the individual making the

enquiry. We may in certain circumstance also request a telephone number. Access to this information will be limited to those individuals who need to know.

If you sign up for any training event or conference we also require personal information so that we can communicate with you about the event.

## **Our use of your personal information**

### **For our marketing purposes**

If you indicate now or at a future time that you consent to our doing so, we will maintain the personal information you provide us with so that we may:-

- contact you to inform you of new services and products we will be providing;
- send you requested information about our services or products; or
- contact you with updates in the further development of any products and/or services you have expressed interest in.

We consider that we may use your personal data in the course of pursuing our legitimate interests as a business engaged in and committed to the success of the education sector.

Our emails provided on the basis above will always have an opt-out option in respect of further communications.

### **For Purposes of entering into contracts and the management and administration of the contract**

We will use the personal information we hold to note enquiries that may be raised in any way that is provided for under the contract. This includes use by users or our products or services of any helpline facility that we provide.

Personal Data of this kind will be retained for the remainder of the contract we hold with the relevant School or will be deleted as otherwise allowed for under this privacy notice.

### **For the purpose of providing services as required by our contracts with schools and other customers.**

We hold information about certain persons for purposes associated with the administration of contracts that we hold with schools and other customers of our

business. We will hold that information for so long as we have a contract with the organisation concerned or until we are advised of any change in the person or persons we are to work with in the administration and management of the contract in which case details of the previous individual will be deleted immediately unless we are then provided with a consent by that person to continue to communicate in relation to our products and services.

We maintain a list of individuals employed or otherwise engaged by our customers who are authorised to call the helpline service we provide. That list is updated regularly based upon updated information provided by the Customer (we have no way of validating that information independently).

We hold a record of individuals who call any helpline services that we provide (this will include circumstances where an individual contacts us by another means but is referred to the helpdesk). We will request the following details: names, contact numbers and work email addresses.

We will hold details of your Data Protection Officer or if you do not have one the individual you have identified as responsible for data protection matters.

We will also have access from time to time to personal and other data that a School that is our customer is the data controller of. This data will be provided by the School either directly or via a third party that is commonly referred to as a data extractor. Please refer to the privacy policy of any school that you may be interested in to understand how it expects us to operate with them as a data processor.

### **To administer events that we organise**

We will use information provided at the point of registration to attend any event that we organise such as training workshops, seminars and events we organise at Trade Fairs to keep you advised of the event prior to it being held. We may also contact you afterwards to encourage you to provide us with feedback relating to the event you have attended.

### **How long do we hold your personal information?**

If you make any enquiry of us that does not within a period of 30 days lead to our providing you with a proposal to provide any of our products and/or services we shall delete the information we have or (if we wish to retain information for the purposes of the further development of our products and services retain the

information without any of the same constituting personal data immediately thereafter.

We hold information relating to individuals who are nominated by Schools and other customers as authorised to work with us in contract management and administration for so long as that authorisation is in place or until the contract with us comes to an end if earlier.

If you register for or attend any event that we organise or participate in and we receive your personal information relating to that, you may be invited to agree that we market to you thereafter in which case your personal information will continue to be held as explained earlier in this Policy. In all other cases your information will be deleted by no later than 60 days following the holding of the event.

## **Unsubscribe and Right to have Personal Data Deleted**

Where you have consented to contact being made by us with you for any of the purposes mentioned above but you no longer wish to receive emails from us or wish to change your selections as to how or what our contact with you should be please email us at [info@pluminnovations.co.uk](mailto:info@pluminnovations.co.uk)

You may also wish to write to us at the address given in at the beginning of this Policy.

If you choose to unsubscribe from our mailing lists we will only make contact with you again in circumstances where you have consented to our being reprovided with your information and that contact is authorised by you.

We will also remove you from our database when we hold your information for other purposes specified in this notice where you request this unless we require to retain the information for example for purposes of compliance with a contract we are required to perform (and then, only data expressly required for the purposes of that contract will be retained other information being securely deleted).

## **Anonymous data collected through this website**

In addition to the information we collect as described above, we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers they use. This technology does not personally identify you – it simply enables us to compile statistics about our visitors and their

use of our website.

Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again this technology does not identify you personally – it simply enables us to compile statistics about the use of these hyperlinks.

## **Cookies and similar technologies**

In order to collect the anonymous data described in the preceding paragraph, we may use cookie technology on our website.

A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. Cookies do not damage your computer.

You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the services and features offered through our website may not function properly if your cookies are disabled.

We use two types of cookies on our website:

### **Strictly necessary cookies**

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for cannot be provided. They are deleted when you close the browser.

### **Performance cookies (e.g. Google Analytics)**

These cookies collect information in an anonymous form about how visitors use our website. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to continually improve the site.

We may also use your IP address to help diagnose problems with our server, to administer our website and to improve the service we offer to you. An IP address is a numeric code that identifies your computer on a network, or in this case, the internet. Your IP address might also be used to gather broad demographic information.

We may perform IP lookups to determine which domain you are coming from (i.e. aol.com, yourcompany.com) to more accurately gauge our users' demographics.

Information from these types of cookies and technologies or about website usage is not combined with information about you from any other source. None of the cookies or technologies that we use will personally identify you.]

## **Consent**

To comply with current legislation, we need to ask for your consent to set the performance cookies described above. When you arrive on our website a banner appears asking for your consent to place performance cookies on your device. By continuing to use our website or by clicking 'OK', we assume that you consent to cookies being placed on your device. If you do not agree please leave our website immediately. Once your consent has been provided, this message will not appear again when you revisit. If you, or another user of your computer, wish to withdraw your consent at any time, you can do so by altering your browser settings.

## **If you wish to access any personal data we hold**

You are entitled to make a request that we provide you with any personal information that we hold concerning you by making a subject access request. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form

all circumstances save where you request multiple copies of the information requested.

We will also correct, amend or delete any personal information that you tell us is inaccurate and notify any third party recipients of the necessary changes. You may update any information you have given to us by contacting us at our registered address or the email address given above.

We expect Schools, under their agreement with us to ensure that personal data they provide is updated as required so as to maintain its accuracy.

## **Disclosure of your personal information**

We do not share, sell or distribute your personal information with unrelated third parties, except as otherwise provided for in this privacy policy and in circumstances in which you have expressly consented to the sharing and the purpose for which the sharing is to be undertaken.

We may share, transfer or disclose the information in our databases and server logs to comply with any legal requirements, or in the event of our flotation on a stock exchange, sale, merger, reorganisation, dissolution, disposal of all or part of our assets or similar event. We will inform you of any such transfer or disclosure if required by law.

## **Data access and corrections**

Requests to delete personal information are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.

## **Links to other websites**

Our website may contain hyperlinks to websites that are not operated by us. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information about yourself.

## **Transfer of data abroad**

If you are visiting this website from a country other than the country in which our servers are located (currently United Kingdom), the various communications will necessarily result in the transfer of information across international boundaries. By visiting this website and communicating electronically with us, you consent to the processing and transfer of your personal information as set out in this privacy policy.