



## WHO WE ARE

National Association of Virtual School Heads is a registered charity in England and Wales (charity number 1166708) with a registered address at 9-11 Vittoria Street, Birmingham B1 3ND. .

When you engage with us, you may share some information with us. We want to be upfront about the information we collect, how we use it, who we share it with and the choices we give you to control, access and update your information. For the purposes of data protection legislation, we are the data controller of your personal data.

Please read this privacy policy carefully.

Questions, comments and requests regarding this privacy policy are welcomed and should be emailed to us at: [info@navsh.org.uk](mailto:info@navsh.org.uk).

## SUMMARY

- We keep to a minimum the information we hold about you.
- We use your data to engage with you, respond to your enquiries, manage our relationship with you, meet our legal obligations, and improve our website.
- We delete your data when it is no longer needed for these things.
- Generally, we do not give your information to third parties, but there are some exceptions.
- You have lots of privacy rights.
- We take security seriously.
- We are happy to answer your questions about any of this.

## THE PERSONAL INFORMATION WE COLLECT AND USE

We ensure that your privacy is respected at all times and our primary goal is to improve upon and make sure our content is relevant for all our users, while also ensuring that personal information of all users is respected and protected.

To learn about the information we collect and how we use your personal data, read the notice or notices which apply best to your relationship with us:

[I have a membership with you as a Virtual School Head \(VSH Membership Holders\)](#)

I have a membership with you as an associate (**Associate Membership Holders**)

I am enrolling onto a course with you (**Students**)

## **COOKIES**

Our website uses cookies. Cookies are pieces of code that allow small amounts of information to be passed from your internet browser to our web server. We use third party cookies, serving several purposes. All data passed by cookies is anonymous and will never contain your name, address, telephone number or payment details.

They enable us to:

- estimate our audience size and usage pattern;
- store information about your preferences, and so allow us to customise our site according to your individual interests;
- speed up your searches; and
- recognise you when you return to our site.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **SHARING AND TRANSFERRING YOUR PERSONAL INFORMATION**

We may share your information or data with trusted third parties who help us provide certain aspects of our business. In particular, we may share your information with:

- the affiliate university supplying the course you enrol onto (if applicable);
- third parties who facilitate our membership services to you;
- third parties who help us track website conversion and success metrics; and
- third parties who log any errors and issues with our website.

For VSH Membership Holders only: where requested, we may share your name and contact details with other Virtual School Heads who hold memberships with us and the Department for Education.

We enter into confidentiality and data processing terms with our partners to ensure they comply with high levels of confidentiality and best practice in privacy and security standards and we regularly review these standards and practices.

We also have to share information or data in order to:

- meet any applicable law, regulation, legal process or enforceable governmental request;
- enforce applicable policies, including investigation of potential violations;
- detect, prevent, or otherwise address fraud, security or technical issues; and

- protect against harm to the rights, property or safety of our users, the public or to us and/or as required or permitted by law.

Your personal information may be stored and processed in any country where we engage service providers, including outside the EEA. Whilst these countries will have data protection rules that differ from the EEA, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your personal information remains protected to the standards described in this privacy policy.

If you would like further information about who we share your personal information with, please contact us.

## **RETAINING YOUR PERSONAL INFORMATION**

We will hold on to your information for as long as is needed to be able to continue engaging with you.

We may also keep hold of some of your information if reasonably necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

## **KEEPING YOUR PERSONAL INFORMATION SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way.

We use Dropbox, a third-party file hosting provider, who stores all personal information in a secure environment, with a comprehensive security protocol in place. For more information relating to how Dropbox keeps personal information secure, please visit [https://www.dropbox.com/en\\_GB/security](https://www.dropbox.com/en_GB/security).

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **CONTROL OVER YOUR PERSONAL INFORMATION**

Under the General Data Protection Regulation, you have a number of important rights available to you for free. In summary, those include rights to:

- be informed about how your personal information is being used (hopefully this privacy policy explains it all);

- access the personal information we hold about you;
- request that we port elements of your data to another service provider;
- request us to correct any mistakes in your information which we hold
- request the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured format;
- stop any direct marketing which you can do through your account or the unsubscribe links at the bottom of emails; and
- object to decisions being taken by automated means concerning you or significantly affect you.

We are registered with the Information Commissioners Office in the UK with reference number A84 19522

For further information on each of these rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of these rights, please:

- email us at [info@navsh.org.uk](mailto:info@navsh.org.uk);
- let us have information to identify you;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

## **OPTING OUT**

If you want to opt out of receiving information from NAVSH please email [info@navsh.org.uk](mailto:info@navsh.org.uk)

## **HOW TO COMPLAIN**

We hope that we can resolve any query or concern you raise about our use of your information. If you are not happy with how we manage your personal data, you have the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

## **CHANGES TO THIS PRIVACY POLICY**

This privacy policy was published on [26<sup>th</sup> November 2018 and last updated on 26<sup>th</sup> November 2018.

Any changes we make to this notice will be posted on this page.

## HOW TO CONTACT US

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us please send an email to [info@navsh.org.uk](mailto:info@navsh.org.uk)

### Privacy Policy: VSH Membership Holders

## SUMMARY

This page sets out what information we process when you hold a membership with us as a Virtual School Head (VSH).

## WHAT PERSONAL INFORMATION WE HOLD

**Contact information:** when you register for a VSH membership with us, we collect your first and last name, postal address, email address and phone number.

**Employment information:** when you register for a VSH membership with us, we collect details relating to the local authority you work for.

**Usage information:** we collect usage information about you whenever you interact with our websites and other online content. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, and so on.

**Device and browser data:** we collect information from the device and application you use to access our website. Device data mainly means your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

**Third party integration:** our website connects directly with third-party websites such as Twitter so that we can better understand the use of our website, and to show you relevant content, including ads.

**Billing information:** we require you to provide your billing details, a name, address, purchase order number (if applicable) and financial information corresponding to your selected method of payment (e.g. a bank account number). Financial data is stored securely by a third party, details of which are available upon request.

## HOW WE USE YOUR PERSONAL INFORMATION

We process personal data about you:

- with your consent; and/or
- to fulfil our contractual responsibility to you; and/or

- to pursue our legitimate interests of providing support and improving the content we offer and developing new features; and/or
- to comply with a legal obligation.

Category of personal data	Purpose for processing	Legal basis for processing
<b>Contact information</b>	We use your contact information to: <ul style="list-style-type: none"> <li>• engage with you and to provide content to you (e.g. to communicate with you about upcoming events, guidance papers and research we have carried out);</li> <li>• to keep a record of your relationship with us and for internal administrative purposes;</li> <li>• to let you know about changes to our services and policies;</li> <li>• provide you with customer support;</li> <li>• send you communications of a transactional nature (e.g. billing-related matters);</li> <li>• to send you our newsletter and information relating to events we are a part of (for as long as you do not opt-out); and</li> <li>• to ask you to carry our surveys so you can let us know how we're doing.</li> </ul>	Fulfilment of a contract Consent Legitimate interests
<b>Usage information</b>	We collect information about the types of content you engage with, so we can direct you to other relevant features that we offer and help you in engaging with us.	Legitimate interests
<b>Device and browser data</b>	We use device and browser data to troubleshoot problems with our website and to make improvements to it, or to customise the interface for that device. We also infer your geographic location based on your	Legitimate interests Legal requirement

	IP address for abuse and tax and pricing purposes.	
<b>Third parties and integrations</b>	<p>We collect and use information from third parties and integration partners to:</p> <ul style="list-style-type: none"> <li>• ensure you can interact with us through a third-party integration; and</li> <li>• personalise our content for you.</li> </ul>	Legitimate interests
<b>Billing information</b>	We use your billing information to bill you for your VSH membership. Your VSH membership fees contribute to the work of NAVSH, helping to commission important research.	Fulfilment of a contract

## Privacy Policy: Associate Membership Holders

### SUMMARY

This page sets out what information we process when you hold a membership with us as an associate.

### WHAT PERSONAL INFORMATION WE HOLD

**Contact information:** when you register for an associate membership with us, we collect your first and last name, postal address, email address and phone number.

**Usage information:** we collect usage information about you whenever you interact with our websites and other online content. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, and so on.

**Device and browser data:** we collect information from the device and application you use to access our website. Device data mainly means your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

**Third party integration:** our website connects directly with third-party websites such as Twitter so that we can better understand the use of our website, and to show you relevant content, including ads.

**Billing information:** we require you to provide your billing details, a name, address, purchase order number (if applicable) and financial information corresponding to your selected method of payment (e.g. a bank account number). Financial data is stored securely by a third party, details of which are available upon request.

### HOW WE USE YOUR PERSONAL INFORMATION

We process personal data about you:

- with your consent; and/or
- to fulfil our contractual responsibility to you; and/or
- to pursue our legitimate interests of providing support and improving the content we offer and developing new features; and/or
- to comply with a legal obligation.

Category of personal data	Purpose for processing	Legal basis for processing
<b>Contact information</b>	We use your contact information to: <ul style="list-style-type: none"><li>• engage with you and to provide content to you (e.g. to invite you to our annual conference);</li><li>• send you service related emails including website improvements and changes and a welcome</li></ul>	Fulfilment of a contract Consent Legitimate interests



	<p>email;</p> <ul style="list-style-type: none"> <li>• onboarding tutorials (for as long as you do not opt-out);</li> <li>• provide you with customer support;</li> <li>• send you communications of a transactional nature (e.g. billing-related matters);</li> <li>• to send you our newsletter and information relating to events we are a part of (for as long as you do not opt-out); and</li> <li>• to ask you to carry our surveys so you can let us know how we're doing.</li> </ul>	
<b>Usage information</b>	We collect information about the types of content you engage with, so we can direct you to other relevant features that we offer and help you in engaging with us.	Legitimate interests
<b>Device and browser data</b>	We use device and browser data to troubleshoot problems with our website and to make improvements to it, or to customise the interface for that device. We also infer your geographic location based on your IP address for abuse and tax and pricing purposes.	Legitimate interests Legal requirement
<b>Third parties and integrations</b>	<p>We collect and use information from third parties and integration partners to:</p> <ul style="list-style-type: none"> <li>• ensure you can interact with us through a third-party integration; and</li> <li>• personalise our content for you.</li> </ul>	Legitimate interests
<b>Billing information</b>	We use your billing information to bill you for your associate membership.	Fulfilment of a contract

## Privacy Policy: Students

### SUMMARY

This page sets out what information we process as a student applying to enrol onto one of our courses.

### WHAT PERSONAL INFORMATION WE HOLD

**Contact information:** when you register for a course with us, we collect your first and last name, address, email address, phone number and the course location you wish to attend. We share this with the university we contract to provide the course.

**Employment information:** when you register for a course with us, we may collect details of the organisation you work for and your job role.

**Usage information:** we collect usage information about you whenever you interact with our websites and other online content. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, and so on.

**Device and browser data:** we collect information from the device and application you use to access our website. Device data mainly means your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

**Third party integration:** our website connects directly with third-party websites such as Twitter so that we can better understand the use of our website, and to show you relevant content, including ads.

**Billing information:** we require you to provide your billing details, a name, address, purchase order number (if applicable) and financial information corresponding to your selected method of payment (e.g. a bank account number). Financial data is stored securely by a third party, details of which are available upon request. This information will not be shared with the affiliate university providing the course.

### HOW WE USE YOUR PERSONAL INFORMATION

We process personal data about you:

- with your consent; and/or
- to fulfil our contractual responsibility to you; and/or
- to pursue our legitimate interests of providing support and improving the content we offer and developing new features; and/or
- to comply with a legal obligation.

Category of personal data	Purpose for processing	Legal basis for processing
Contact information	We use your contact information to: <ul style="list-style-type: none"><li>• provide you with our services (e.g. to enrol you onto a course);</li></ul>	Fulfilment of a contract Consent

	<ul style="list-style-type: none"> <li>• bill you for our services;</li> <li>• send you service related emails including service improvements and changes and a welcome email;</li> <li>• onboarding tutorials (for as long as you do not opt-out);</li> <li>• provide you with customer support;</li> <li>• send you communications of a transactional nature (e.g. billing-related matters);</li> <li>• to send you our newsletter (for as long as you do not opt-out); and</li> <li>• to ask you to carry our surveys so you can let us know how we're doing.</li> <li>• Inform the university we contract for the course that you wish to register as a student</li> </ul>	Legitimate interests
<b>Usage information</b>	We collect information about the types of content you engage with, so we can direct you to other relevant features that we offer and help you in engaging with us.	Legitimate interests
<b>Device and browser data</b>	We use device and browser data to troubleshoot problems with our website and to make improvements to it, or to customise the interface for that device. We also infer your geographic location based on your IP address for abuse and tax and pricing purposes.	Legitimate interests Legal requirement
<b>Third parties and integrations</b>	We collect and use information from third parties and integration partners to: <ul style="list-style-type: none"> <li>• ensure you can interact with us through a third-party integration;</li> <li>and</li> <li>• personalise our content for you.</li> </ul>	Legitimate interests

<b>Billing information</b>	We use your billing information to bill you for the course you enrol onto.	Fulfilment of a contract
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