

# UK EDUCATION RESEARCH AND INNOVATION LTD.

## PRIVACY AND 'COOKIE' POLICY

*When this document refers to "UKERI" or "we" or "our," it is referring to UK Education Research and Development Ltd.*

### Introduction

UKERI is committed to protecting your personal information when you interact with us. We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018) / UK Data Protection Act and Privacy of Electronic Communication Regulation.

UKERI is Registered with the *Information Commissioners Office (ICO)*: Our ICO Number is Z3590407.

In order to provide you with the full range of UKERI services, we sometimes need to collect information about you. In this respect, this Privacy and Cookies Policy relates to our use of any personal information we collect from you when interacting with us by (for example) phone, SMS, email, in letters and other correspondence and in person in the following indicative contexts:

- any form of consultative or advisory service provided by UKERI;
- any website or digital application provided and run by UKERI that links to this Privacy and Cookies Policy;
- social media or approved UKERI content on other websites;
- mobile devices and video ("Apps") provided by UKERI.

This Privacy and Cookies Policy explains the following:

- what information UKERI may collect about you;
- how UKERI will use information we collect about you;
- when UKERI may use your details to contact you;
- whether UKERI will disclose your details to anyone else;
- your choices regarding the personal information you provide to us;
- the use of cookies on UKERI websites and how you can reject cookies.

## **Our online services**

This policy applies to any UKERI service operated as part of the UKERI service and hosted on UKERI run domains such as *UK Education* (ukeducation.co.uk), *eData* (edata.cc), Governor Hub (governor.org.uk) and any other UKERI apps or websites branded clearly as being provided by UKERI and containing UKERI content.

Other companies might run UKERI-branded services under licence. These companies must operate to UKERI standards but please make sure you always check the privacy policy of the websites you use so you know who runs the website and how they will use your data.

Please note that in the case of the internet, no website can be completely secure; if you have any concerns that your UKERI account could have been compromised e.g. someone could have discovered your password, please get in touch straight away.

Some UKERI websites contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

## **What information will UKERI collect about me?**

When you participate in, order, access or sign up to any of UKERI's services, activities or online content, we may occasionally request and/or receive personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number, gender or date of birth, as well as information collected about your use of UKERI products and services (such as what you access from UKERI).

If you are the parent or guardian of a child under 13, we may process limited personal data about you so you can give consent for the child to access some UKERI services. We may use your contact details to communicate with you about the child's account or use of services.

UKERI sometimes collects information about how you use UKERI mobile or TV Apps, UKERI websites or other UKERI content online, and the device(s) you use to access the services. This can include collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet. For more information, please see the section of this policy on UKERI's use of cookies and similar technologies, and the section on information collected by UKERI when you use UKERI Apps on a Smart device such as a TV or mobile device.

## How will UKERI use the information it collects?

Where collected, UKERI will use your personal information for a number of purposes including the following:

- to provide our services, activities or online content, to provide you with contextualised information and to respond to your requests and enquiries;
- to provide you with the most user-friendly online navigation experience;
- for "service administration purposes", which means that UKERI may contact you for reasons related to the service, activity or online content you have signed up for, as set out in the section below (e.g. to provide you with password reminders, to notify you that a particular service, activity or online content has been suspended for maintenance, to notify you of major and significant updates to our Privacy and Cookies Policy or Terms of Use, to let you know if your UKERI account has become dormant and to ask if you would like to use it again before we close it);
- to contact you about a submission you have made, including any content you provide. For additional information, please see the 'Terms of Use';
- to use IP addresses and device identifiers to identify the location of users, to block disruptive use, to establish the number of visits from different countries.
- for analysis and research purposes so that we may improve the services offered by UKERI.
- we may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Where UKERI proposes using your personal information for any other uses we will ensure that we notify you first. Please see the section below for details.

## When will the UKERI contact me?

UKERI may contact you:

- in relation to any service, activity or online content you or your under-13-year-old child have signed up for, in order to ensure that UKERI can deliver the services, e.g. to verify your email when you sign up for a UKERI account, or to help you reset your password or to ask whether you agree to your child's request for additional account permissions;
- in relation to any correspondence we receive from you or any comment or complaint you make about UKERI products or services;
- in relation to any personalised services you are using;
- in relation to any contribution you have submitted to a UKERI service, e.g. on a message board or via text or voicemail message;
- to invite you to participate in surveys about UKERI services;
- to update you on any material changes to UKERI's policies and practices; and
- for marketing purposes, as set out in the section below.

We will never contact you to ask for your account passwords, or other login information. Please be cautious if you receive any emails or calls from people asking for this information and claiming to be from UKERI.

## **Will I be contacted for marketing purposes?**

UKERI will only send you marketing emails or contact you on UKERI service platforms where you have explicitly previously agreed to this.

## **Will UKERI share my information with anyone else?**

We will keep your information within UKERI except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies, including for child protection reasons) or as described below.

We will only use your information within UKERI and will only share it outside of UKERI where you have requested it or given your consent. Sometimes UKERI uses third parties to process your information on our behalf, for example to provide services or analysis. UKERI requires these third parties to comply strictly with its instructions and UKERI requires that they do not use your personal information for their own business purposes, unless you have explicitly consented to the use of your personal information in this way.

## **Offensive or inappropriate content**

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to UKERI websites or otherwise engage in any disruptive behaviour on any UKERI service, UKERI may remove such content.

Where UKERI reasonably believes that you are or may be in breach of any applicable laws, for example on hate speech, UKERI may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. UKERI would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

## **What if I am a user aged under 18?**

If you are aged 18 or under, please get your parent/guardian's permission before you provide any personal information to UKERI.

## **How long will UKERI keep my information?**

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

UKERI. If you delete your UKERI account then your personal information is deleted immediately, and the remaining information is anonymised for analytical purposes.

Where you contribute content together with your personal information (User Generated Content or UGC) please refer to the 'Terms of Use' provided within that service for further information about how long we may store such material.

If you have not used your UKERI account in the last year then your account may be classed as dormant and will be deleted in line with this privacy policy. We will email to remind you before deletion so please check your inbox regularly to see if we have sent you any emails about this.

## **Storage of information**

*UK Education Research and Innovation Ltd.* (UKERI) is based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our systems are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However, we only allow this when we have reason to believe that it will be adequately protected. (e.g. through, for example, US Privacy Shield or Standard EU contractual clauses).

## **How we secure your data**

Information system and data security is imperative to us to ensure that we are keeping our customers, members, volunteers, employees and contractor safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and as secure as reasonably deemed possible against the ever-changing threat landscape.

## **Sensitive personal data**

The law defines 'sensitive personal data' as (for example) information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

Only in certain very limited circumstances, would we legally collect and process sensitive personal data without requiring explicit consent. For example, we might process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This

processing will not normally happen without the employee's knowledge and, where necessary, consent.

In all other cases we will only process data about, but not limited to, a person's racial and ethnic origin, their sexual orientation or their religious beliefs where they have self-volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

## **Can I delete my data?**

You can always delete, or have deleted, your UKERI account or any associated data we hold. Normally such options are presented within the user interface of the service in question, however should you need UKERI to do this for you then email [dataprotection@ukeducation.co.uk](mailto:dataprotection@ukeducation.co.uk). A data deletion application will be sent to you.

As explained in the section above, deleting your UKERI account will erase any personal information in your account that we have about you and it will mean any data we hold about how you have used UKERI will be made anonymous.

## **Can I find out what personal information UKERI holds about me?**

Under the *Data Protection Act* you have many rights which we fully uphold, including (but not limited to) the right to:

- request a copy of the personal information UKERI holds about you and to have any inaccuracies corrected;
- rectify any personal information held about you;
- have data portability;
- restrict processing on the data held about you;
- object to any data held about you;
- define whether automated decision-making, including profiling, is used and its consequences;
- withdraw from consent at any time;
- understand the consequences (if any) of withdrawing consent.

We do not make any administrative charge for any of the requests made in relation to you exercising your rights, but we will require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files or perform any other required duty. Please address requests and questions about this or any other question to [dataprotection@ukeducation.co.uk](mailto:dataprotection@ukeducation.co.uk)

# Web browser cookies

## What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to (for example) your computer, tablet, mobile phone (all referred to here as a "device") or web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. When you first visit any of our web services, you will be asked if you are happy for cookies to be used. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the UKERI website. However, you can change your cookie settings at any time by following your particular browsers instructions (see the browsers 'help' function).

On UKERI websites, cookies may also record information about your online preferences and allow us to tailor our websites to your interests. During the course of any visit to a UKERI website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

## How does UKERI use cookies?

Information supplied by cookies can also help us to understand the profile of our users and help us to provide a better user experience. It also helps us to recognise when a user is signed in to a UKERI account and to provide a more personalised experience. For example, if on a previous visit a user went to a particular set of pages, the web site might automatically find this out from your cookie and highlight additional information on your second and subsequent visits. UKERI uses this type of information to help improve the services it provides to its users. Certain areas of UKERI websites may use cookies for a specific reason - for example, to help animated graphics work effectively on your device.

## Third party cookies in embedded content on UKERI pages

Please note that during your visits to UKERI websites you may notice some cookies that are not related to UKERI or the UKERI's contractors.

To support our services, we very occasionally embed content from social media and other third-party websites. These may include (for example) YouTube, Twitter, Facebook, SoundCloud, Vine, Instagram, Pinterest and Flickr. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third-party cookies may track your use of the UKERI website.

UKERI does not control the dissemination of these cookies and you should check the relevant third party's website for more information.

Where UKERI embeds content from social media and other third party websites, some websites may use Google Analytics to collect data about user behaviour for their own purposes. UKERI does not control this. For more information, see the Google website.

## UKERI cookies and how to reject cookies

Full information about cookies, and how to control what cookies are set on your device can be found by using your web browser or device settings. See the 'help' functionality of your device or web browser for further information regarding how to do this.

It is important to note that if you change your settings and block certain cookies, you may not be able to take full advantage of some user-interface features of UKERI services, and we might not be able to provide some features you have previously chosen to receive. However, you will not be blocked from using the service if you do not wish to use cookies, but some ease-of-use user-interface elements may be compromised.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit the third-party site [www.allaboutcookies.org](http://www.allaboutcookies.org). Further links regarding how to delete cookies on common browsers can be found at:

- [Disable Cookies in Chrome](#)
- [Disable Cookies in Firefox](#)
- [Disable Cookies in Safari](#)
- [Disable Cookies in Internet Explorer](#)

Below is a list of the cookies typically used on our websites:

Cookie	Type	Expiry	Linked information	Functions
ServerID	Session	Browser close	Anonymous	To provide an improved and faster server time, the ServerID cookie remembers which server should handle the user's requests.
JSESSIONID	Session	Browser close	Anonymous	To notice a first time user to a site and provide a message to let them know that the site uses some cookies.

Cookie	Type	Expiry	Linked information	Functions
JSESSIONID	Session	Browser close	Username	When a user logs in, maintains authentication state, access rights, etc.

The cookie information provided here is accurate to the best of our knowledge. If however you think that a cookie is being used that is not listed here then do not hesitate to contact us using the contact information provided in this document.

### Other information collected from web browsers

Your web browser may also provide UKERI with information about your device, such as an IP address and details about the browser that you are using. Where requesting local services, it may be possible for you to choose to provide UKERI with access to your device's location through the web-browser. We sometimes use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to UKERI services and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please contact us at [dataprotection@ukeducation.co.uk](mailto:dataprotection@ukeducation.co.uk)

## Apps, Devices and Smart TVs

When you download or use UKERI apps on your mobile device or TV, information may be accessed from or stored to your device. Most often this is used in a similar way to a web browser cookie, such as by enabling the app to 'remember' you or provide you with the content you have requested.

Your web browser or device may also provide UKERI with information about your device, such as a device identifier or IP address. Device identifiers may be collected automatically, such as the device ID, IP address, MAC address, IMEI number and app ID (a unique identifier relating to the particular copy of the app you are running).

When/if you sign in to a UKERI app, your sign-in details may be stored securely on the device you are using, so you can access other UKERI apps on the same device without needing to enter your sign-in details again.

If you have any concerns about the information which might be accessed from or stored on your device by UKERI, you may wish to only access UKERI content through a web browser and review your web browser settings to limit tracking - see your web browser for more information.

## **Changes to UKERI's Privacy and Cookies Policy**

This Privacy and Cookies Policy may be updated from time to time so you may wish to check it each time you submit personal information to UKERI. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use UKERI websites to submit personal information to the UKERI. You can also delete any UKERI accounts held at any time – please see the section below for our contact details or the service site in question (where relevant).

If material changes are made to the Privacy and Cookies Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

## **Contacting the UKERI about this Privacy and Cookies Policy**

If you any concerns, questions or comments about this Privacy and Cookies Policy please do not hesitate to contact:

**The UKERI Data Officer**  
(Email: [dataprotection@ukeducation.co.uk](mailto:dataprotection@ukeducation.co.uk))

Thank you. We hope you enjoy and gain benefit from our services and sites.

**May 10<sup>th</sup> 2018**