

The Link CPD Privacy Notice

This privacy policy relates to the use of The Link CPD service.

Who is Speech Link Multimedia Ltd?

Speech Link Multimedia Ltd is a private limited company. Registered Office: Canterbury Innovation Centre, University Road, Canterbury, Kent CT2 7FG.

Tel 0333 577 0784. Email dataprotection@speechlink.co.uk. Our company registration number is 504452. Our ICO registration number is Z9552034.

We have appointed a Data Protection Officer who can be contacted using the above email address.

Purpose of processing:

We process your personal data for the following purposes:

- To create and manage the contract and account for the provision of The Link CPD to your school
- To deliver our training modules to you as a participant
- To provide ongoing support for your use of The Link CPD
- To modify and improve The Link CPD

We are the data controller for these processing activities.

Lawful Basis for processing:

Our lawful basis for processing your personal data depends on the purpose:

- We process your personal data to provide and manage the contract and account for your school under the basis of our legitimate interests in managing our customer accounts and responding to enquiries,
- We process your personal data to deliver our training modules to you as a participant under our legitimate interest in being able to provide our services to you as an enrolled member of one of our courses,
- We process your personal data to support you when using The Link CPD under our legitimate interest in being able to support our customers,
- We process your personal data to improve the performance of The Link CPD under our legitimate interest of being able to correct faults and improve functionality. We will also ask for your consent to install analytics cookies to assist with improving and developing The Link CPD, and we will not install them without your consent.

Special category data:

We do not collect any special category data for these processes.

What personal data do we collect?

To respond to your enquiry and set up your school's account and contract:

- School name & address
- Your name
- Telephone number
- Email address
- Role in school

To deliver The Link's training modules to you as a participant:

- School name and address
- Your name
- Telephone number
- Email address
- Role in school
- Course module responses and assessments

Do we ever share personal data?

1. We will share data if required to do so by a legitimate law enforcement agency
2. We will be using Zoom to discuss your participant training with you, and to deliver the training. Basic personal data will be shared with Zoom to facilitate the call and the training.
3. If you consent to the use of analytics cookies then you will be sharing personal data with the third party analytics provider.

How do we keep your data secure?

We take appropriate steps to maintain personal data in a secure environment to ensure Confidentiality, Integrity and Availability. These measures include encryption, access restriction and physical security.

1. We hold Cyber Essentials Plus Certification,
2. All data sent between a web browser and our server are encrypted in transit,
3. All personal data are encrypted at rest, both for live databases and backup versions,
4. Our web servers reside in highly secure ISO27001 certified UK based data centres,
5. All our staff have an appropriate DBS check, dependent upon their role,
6. Where possible we anonymise personal data for service improvement and analytics purposes,
7. We have physical security in place at our offices including CCTV and security patrols,
8. We have protocols in place to ensure personal data is handled in an appropriate manner,
9. We will inform you if we subcontract any further data processing,

10. All staff sign a non-disclosure agreement relating to their employment and are subject to a duty of confidence.

How can you keep your data secure?

1. Do not share your access details.
2. Log out or lock the screen if you leave your computer unattended.
3. Don't leave a record of your login details (e.g. post-it note) near the computer.
4. Remember we will never call you to request your access details.

Your Rights

You have a number of rights relating to our processing of your data, if you would like to exercise them or ask us about them then please contact us. We may need to verify your identity when you do so.

We won't levy a charge for doing any of the following, however we may levy an administration charge in the case of frequent repeat requests.

- Access: You have the right to access a copy of the data we hold about you,
- Rectification: If you think some of the data we hold is incorrect then you have the right to ask us to correct it,
- Erasure: You have the right to ask us to delete the data we hold about you. Where we are processing data due to our legitimate interests, you can ask us to delete your data and we will do so if deleting it does not significantly impede our interests,
- Restriction: You have the right to ask us to temporarily cease processing your data, for example you can ask us to restrict processing whilst we verify corrections which you have requested,
- Awareness: You have the right to be fully informed about why and how we process your information. This privacy notice is intended to meet that requirement, but please do contact us if you have any questions,
- Object: You can object to us processing your data where our lawful basis for processing is based on us having a legitimate interest to do so. We will consider your objection fairly, in consultation with our Data Protection Officer, and confirm to you whether your objection is upheld or not. Where it is upheld we will then delete your personal data,
- Data portability: You can request a copy of your data in a digital format which you can then supply to another provider,
- Automated decision making: We don't apply any automated decision making algorithms for the processes covered by this privacy notice,
- Consent: Where we are relying on your consent to process your personal data you may withdraw your consent at any time.

Data Retention – how long do we keep your data for

Where we are processing data for the purpose of fulfilling a contract with your school we will keep your data for 7 years from the end of the contract.

Where we are processing personal data for the purpose of delivering The Link CPD training to you as a participant we will retain your basic personal data (name, school, contact details etc) for five years, however we will retain your responses to module questions for a shorter period of six months after the completion of the module.

Where we are collecting data with your consent then we will keep your data until such time as you withdraw your consent.

Cookies - How do we use cookies on our websites?

Name of Cookie	Set By	Type
ajs_anonymous_id	newrelic.com	Monitoring use and server performance
TSNGUID	newrelic.com	Monitoring use and server performance
osano_consentmanager	newrelic.com	Monitoring use and server performance
_mkto_trk	newrelic.com	Monitoring use and server performance
osano_consentmanager_uuid	newrelic.com	Monitoring use and server performance
_lr_hb-dlgskn%2Fspeechlink-training-live	cpd.speechandlanguage.support	Error tracking (logrocket)
_lr_tabs-dlgskn%2Fspeechlink-training-live	cpd.speechandlanguage.support	Error tracking (logrocket)
cpd-production	cpd.speechandlanguage.support	User Session
XSRF-TOKEN	cpd.speechandlanguage.support	Security
_lr_uf-dlgskn	cpd.speechandlanguage.support	Error tracking (logrocket)
base-token	cpd.speechandlanguage.support	User authentication

If you would like to know more about cookies, please visit the [ICO website](#).

What happens when I follow links to other sites?

If you follow links to other sites from our website your data will be subject to the privacy policies of those sites. You should refer to these policies before providing your data.

Where do we process data?

We process data at our registered offices at Canterbury Innovation Centre, University Road, Canterbury, Kent CT2 7FG, and at our UK based data storage provider.

When using the Zoom services for training or individual calls then data are processed in the USA by Zoom and transferred using Standard Contractual Clauses.

We apply UK data protection law and the UK GDPR conditions to our processing.

Making a complaint

You can contact us at the above address, alternatively the supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO. The ICO Helpline number is 0303 123 1113. The ICO will normally ask you to raise the issue with us first.