NETWORKY PRIVACY NOTICE

INTRODUCTION

Welcome to the Networky privacy notice. Networky is a messaging service that helps organisations such as schools and colleges, improve connections and relationships for their applicants and students. Each organisation that uses Networky will have access to their own separate messaging platform, where users are partnered up and can message each other. Networky is owned and operated by Behavioural Insights Ltd ("**BIT**"). BIT will be the controller of the personal data that colleges provide to us or that is provided by you to us directly.

BIT respects the privacy of users and is committed to protecting their personal data. This privacy notice will inform users as to how we look after their personal data when they visit the Networky website and use the messaging platform and tell them about their privacy rights.

It is important that all Networky users read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data so that they are fully aware of how and why we are using their data.

Where we refer to "personal data", "controller" or "processor", we give those terms the meanings they have in the EU General Data Protection Regulation and the UK Data Protection Act 2018 (or any legislation which updates or replaces this legislation).

CONTACT DETAILS

BIT has appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Email address: dpo@bi.team

Postal address: 4 Matthew Parker Street, London SW1H 9NP, United Kingdom

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

WHAT PERSONAL DATA DO WE COLLECT ABOUT NETWORKY USERS?

Information to enable you to use the Networky messaging platform:

Students currently in secondary school who have applied to college (the "Students")

For the Students, a college you have applied to attend for sixth form that is using Networky will provide BIT with the personal data required in order to register you with Networky so that you can use the messaging platform.

For the purposes of initial registration to Networky so that we can get in contact with you, your college provides us

with the following personal data:

Applicant ID
First name
Contact details (mobile telephone number and/or email address)
Secondary school
Gender

We will use this information to send an initial registration message. When you register with Networky, you will then provide your consent for us to use the personal data provided to us by the college set out above for the purposes of setting you up on the Networky messaging system.

The college that provided us with your details will be informed that you have registered.

Registering with us is entirely voluntary and you can let us know if you no longer want to be involved by contacting info@networky.co.uk at any time.

Students currently in sixth form who will be messaging partners for the Students (the "Mentors")

Colleges will also ask certain students in year 12 and 13 to register with Networky as messaging partners for potential incoming students. In this case, the colleges will email links to register to the selected existing students who will then register with Networky directly and provide consent to BIT to use the personal data provided on registration. We will inform the college which students have registered with us to be Mentors.

Registering with us is entirely voluntary and you can let us know if you no longer want to be involved by contacting info@networky.co.uk at any time.

Evaluation Data: For the purposes of evaluating the effectiveness of Networky on registration and attendance at college of the Students and its impact on the Mentors, your college may provide us with the following personal data:

Students:

- Confirmation of whether or not you registered at/enrolled at/attended college
- Retention data
- Attendance data
- Achievement data

Mentors:

- Retention data
- Attendance data
- Achievement data

Other students:

- For the purposes of comparison of outcomes between those that participated in the Networky programme as Students and Mentors and those that didn't participate, we may seek data from participating colleges about the students that didn't take part. Where we collect this data, we will ensure either that the data we

receive about these students has been anonymised, or that these other students have been properly informed that their data will be shared with us and have been provided with the opportunity to opt-out of the evaluation.

The Evaluation Data is also used for the general purposes of advancing behavioural sciences research in the education sector. Behavioural Insights Ltd may use your data to create anonymised sets of data for academic research purposes to be shared with trusted academic partners. This anonymised research data cannot be linked to students as individuals or identify students in any way. You have the right to object to this processing so please inform us by emailing info@networky.co.uk if you do not want your data to be processed in this way.

It is in our legitimate interests to process the Evaluation Data for the purposes identified above in order to deliver a meaningful Networky programme. The delivery of a meaningful programme aligns with our core business aims including undertaking research, evaluation and information activities, and delivering innovative technological solutions in sectors that will deliver social impact.

Messaging Data: includes the messages that Networky users send while using the Networky system, and associated information about those messages such as sender, time sent, responses received, recipient, and other information related to the format of the messages. Messaging Data will not be shared with colleges or other third parties except in exceptional circumstances where it is seen that the safety or wellbeing of a Networky user is at risk in accordance with the BIT Group's safeguarding procedures. When you register with Networky, you provide your consent to us to access the Messaging Data for the purposes of ensuring the safety and wellbeing of Networky users. We may also use Messaging Data for the purposes of improving the product, carrying out academic research for internal use or publication, or producing marketing materials. Messaging Data (or fragments thereof) will never be published (or used in marketing materials) in a format that would enable any individual to be identified.

Other data intentionally shared with us: We may collect personal data if it is intentionally submitted to us in other contexts. For example, if we are provided with feedback or a testimonial or responses to a survey. Taking part in these surveys is entirely voluntary and we will process such data on the basis of consent.

Information we automatically collect about you:

Like many website operators, each time someone visits the Networky website or messaging platform, BIT may automatically collect the following information:

Technical information: including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Information about your visit: including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 04/06/2019.

It is important that the personal data we hold about all Networky users is accurate and current. Please keep us informed if your details change during your relationship with us.

OTHER PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

As set out above, we generally use personal data of the Networky users to create their Networky accounts, to administer the messaging platform services, to contact the Networky users regarding changes or updates to the services we provide and for social impact research purposes.

We may also process personal data of the Networky users:

a. To manage and improve our services to Networky customers (namely the Sixth Form College Association and colleges that have signed up to use Networky) and the Networky users - we internally perform statistical and other analysis on information we collect on the messaging platform (including usage data, device data and referral data) to understand how the platform is being used, and to monitor, troubleshoot and improve our services, including to help us evaluate or devise new features.

b. To keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement and research and development purposes;

c. To create and provide new services, features or content. In relation to metadata, we may look at statistics like sign-up and usage rates, and publish interesting observations about these for informational or research purposes;

d. To contact Networky users with communications of a transactional nature (e.g. service-related announcements, changes to our services or policies, welcome messages). It is not possible to opt out of these communications as they are needed to provide our services;

e. where otherwise required or authorised by applicable law, to protect or defend ourselves or others against illegal or harmful activities, or as part of a reorganisation or restructuring of our organisation;

f. to establish, defend or enforce legal claims.

The processing of personal data for these activities is in our legitimate interests in order to study how individuals that are interested in BIT engage with our website and content and make any required improvements, to keep our website up to date and relevant, to develop and grow our business, to prevent fraud or abuse or to enforce our legal rights.

WHO ELSE DO WE PROVIDE YOUR INFORMATION TO?

We may provide your information to:

Our service providers: who process information on our behalf to help deliver the Networky website and messaging platform, for example cloud hosting services, survey platforms and SMS sending and receiving

services.

We take steps to ensure that third parties who have access to your personal data treat it with the same consideration that we do.

Researchers and academics: carefully selected third parties who assist us with our research, including trained scientists, academics and researchers.

Legal enforcement bodies: We may from time to time be required to disclose information about Networky users to law enforcement bodies, agencies or third parties under a legal requirement or court order. We act responsibly and take account of the interests of the Networky users when responding to any such requests.

Your college/the college you have applied to: We may from time to time be asked by colleges which of their applicants or students have registered as incoming students or messaging partners with Networky.

If any Networky users have concerns about these arrangements, they should not use the Networky website or messaging platform.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Subject to any legitimate requirements of law enforcement bodies, we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

COOKIES

This site contains cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. 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 aboutcookies.org or allaboutcookies.org.

This site uses cookies that are strictly necessary to enable you to move around the site or to provide certain basic features, such as logging into secure areas.

The site also uses performance cookies which collect information about how you use the site, such as how you are referred to it and how long you stay on certain pages. This information is aggregated and therefore anonymous and is only used to improve the performance of the site. Some of these performance cookies are Google Analytics web cookies. To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

INTERNATIONAL TRANSFERS

We may share your personal data with third parties as outlined above and within the BIT group of companies.

Other companies in the BIT group are based in Australia, Singapore and the United States. This may involve transferring your data outside the European Economic Area (**EEA**).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact the DPO you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances data subjects can ask us to delete their personal data: see the section below on “Your Legal Rights”.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the DPO.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that

personal data is not disclosed to any person who has no 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.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.