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1.0 Introduction

We, “Voice 21”, take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR-EU and GDPR-UK).

This notice aims to provide clear information to schools, students, parents, and guardians regarding the data we require partner schools to share with us and the information we independently collect. The key points covered in each section are as follows:

2.0 Why we collect your personal information

We collect your personal data for one of the following purposes:

- To manage communications between you and us
- To successfully deliver our sessions in school
- For safeguarding purposes
- To evaluate the impact and improve our sessions
- Manage any queries from yourself
- Manage your accounts and progress on the Voice 21 Exchange



3.0 Lawful basis of processing information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners, namely facilitating and enabling the management of all matters relating to your employment contract and our business, but only where your interests and fundamental rights do not override those interests i.e., recording video sessions for training and quality purposes, carrying out research.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

- **The purpose test** – to identify the legitimate interest
- **Necessity test** – to consider if the processing is necessary for the purpose identified
- **Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

4.0 What information we collect and where from

We collect personal information about website visitors, students and teachers and their respective schools. We gather this information from our member schools. The categories of personal information that we may collect, store and use about you may include:

- Student's full name
- Photos and videos
- School details
- Teacher's name, email address and job role
- Dietary and accessibility information
- An Internet Protocol (IP) address
- Contact details

5.0 How long we keep information for

We pride ourselves on ensuring that your personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. All personal information collected has a defined retention period, which is in-line with retention policies for processing. If you would like to find out how long your information is being retained, please see "additional information", section 13 of this policy.

6.0 Security of personal information

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees,



contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see "additional information", section 13 of this policy.

7.0 Your individual rights

In this Section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- Right to Object
- Right of Access
- Right to be informed
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Data Portability

8.0 Failure to provide personal information

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

9.0 Automated decision making

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

10.0 Transfers to third parties

Voice 21 may disclose your personal data, listed in section 4 to some third parties to help us deliver our services/products. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all of the following categories of recipients:

- Third parties that support us to provide products and services such as cloud-based software services, video cloud-based service.



11.0 Transfers Outside Of The EEA

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the United Kingdom (UK).

If we transfer any personal data outside the UK, we will ensure that any personal information transferred will only be processed on our instruction and that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws. Where personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

Standard Contractual Clauses with the UK Addendum

For more information about transfers and safeguarding measures, please contact us using the information in section 13.

12.0 Right to complaint

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email at data@voice21.org

Alternatively, you can contact us:

By Post: Voice 21, C/O X+Why, 8-10 Grosvenor Gardens, London, SW1W 0DH

Alternatively, you can make a complaint to the Information Commissioner's Office:

By Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website: [Click Here](#)

By Email: [Click Here](#)

By Phone: 0303 123 1113 (Local rate) or 01625 545 745 (National rate)

13.0 Additional information

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy notice or if you wish to receive more information about any topic within it, please contact our Data Team via email on data@voice21.org

14.0 Notice Review and Amendments

We keep this notice under regular review. This Policy was last updated on 17/06/2024

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.