

## **Swivl Privacy Notice**

### **(How we use your information)**

Activate Learning is committed to protecting your privacy. This privacy notice explains how we collect, use and share your personal information, and your rights in relation to the personal information we hold.

This privacy notice concerns students and members of teaching and student support staff who are present in lessons being recorded via Swivl.

Activate Learning Further Education Corporation is the controller of personal information, and is subject to the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

We may collect, use and share your personal information as outlined in this policy in order to support the development of our teachers and to improve the quality of teaching and learning.

### **What information we hold**

The personal information that we collect, hold and share includes video footage of faces, dialogue and activity.

### **Why we hold your information**

We use personal information to:

- Provide appropriate guidance and support to our teachers;
- Assess and improve the quality of our services, especially teaching and learning;
- Comply with the law regarding data sharing;
- Comply with our contractual obligations.

### **The lawful basis for using this information**

Under GDPR, we are able to process information on certain legal grounds (bases). In the case of student information, we collect and use information under the basis of Public Task.

### **Collecting personal information**

The majority of student information you provide to us is necessary for us to support the development of our teachers and to improve the quality of teaching and learning and refusal to supply such information may mean that we are unable to provide our teachers with adequate support. However, if you have a reason to object to the collection of this data, please inform the teacher at the start of the class in which Swivl technology is being used.

### **Storing personal information**

We store personal information securely and in line with our Data Protection Policy and associated procedures. A copy of our Data Protection Policy can be obtained from the Data Protection Officer, whose contact details are listed below. We hold information collected via

Swivl securely on our servers for a maximum of three years after collection, although in most cases it will be kept for less than one year.

## Who we share personal information with

We do not share information collected via Swivl with third parties unless it is necessary and in line with the lawful basis for processing listed above, or with the consent of the student concerned. Where data is routinely shared, a data processing agreement will be established to ensure the protection of students' information.

## Requesting access to your personal data

Under data protection legislation, students have the right to:

- Request access to the information we hold about them (Subject Access Request);
- Be informed of the identity of the controller, the reasons for processing their personal data and other relevant information necessary to ensure the fair and transparent processing of personal data;
- Object to processing of personal data that is likely to cause, or is causing, damage or distress;
- Prevent processing for the purpose of direct marketing;
- Object to decisions being taken by automated means;
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and/or
- Claim compensation for damages caused by a breach of the data protection regulations.

## Contact

In order to make a Subject Access Request or to discuss anything in this privacy notice, please contact our Data Protection Officer:

Email: [dpo@activatelearning.ac.uk](mailto:dpo@activatelearning.ac.uk)

Phone: 01865 551228

Address: Activate Learning  
City of Oxford College  
Oxpens Road  
Oxford  
OX1 1SA

## Concerns

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>