

# Privacy Policy

[For an easy read version of this policy click here.](#)

Digital Unite Ltd is committed to protecting and respecting your privacy. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or the regulator if you have a complaint.

## Who are we

This Privacy Policy provides information on the processing of personal data by Digital Unite.

We are the leading provider of Digital Champion training, which it delivers via its online training platforms. We serve housing associations, councils, charities, corporates and the general public via the following online platforms. Full details about us and our product can be found here: <http://www.digitalunite.com/about/>

DU operates in the UK and our registered office is: 18 Hundred Acres, Wickham, Fareham PO17 6JB. We are registered with the ICO as a Controller under registration number Z748481X.

<p>Digital Unite website <a href="https://www.digitalunite.com">(<a href="https://www.digitalunite.com">https://www.digitalunite.com</a>)</a></p>	<p>Our website provides:</p> <ul style="list-style-type: none"> <li>• Freely accessible technology guides to the general public</li> <li>• Information about our Digital Champion service</li> <li>• Industry insights</li> </ul>
<p>The Digital Champions Networks, including: <a href="https://www.digitalchampionsnetwork.com">https://www.digitalchampionsnetwork.com</a> <a href="https://digitalinspire.co.uk/">https://digitalinspire.co.uk/</a></p>	<p>The Digital Champions Networks provide:</p> <ul style="list-style-type: none"> <li>• A unique training and support community for aspiring and experienced Digital Champions</li> <li>• Management information for organisations who are running dedicated Digital Champion projects</li> <li>• Membership sits behind a log-in: the Digital Champions Networks are not freely available to the general public.</li> </ul>

Note: Digital Unite's updated (2022) Digital Champions Network has been built with Learning Pool (<https://learningpool.com/>) on Learning Pool's Learning Management System (LMS) technology.

To read Learning Pool's Policies *in relation to their LMS*, please see here:

- Accessibility Statement <https://bit.ly/3ReutrM>
- Privacy Policy <https://learningpool.com/privacy-policy/>

## What our privacy policy covers

- This privacy policy covers use of the Digital Unite website and the Digital Champions Networks (including Inspire).
- It does not cover the links within our websites linking to other websites. We encourage you to read the privacy statements on the other websites you visit.
- It does not apply to any third-party websites that may have links to our own website.
- It does not cover how a Digital Champion's data is used by their sponsoring organisation. Digital Champions can get this information from their organisation directly.

By visiting our websites or using our services, you agree that we can use your personal information for the purposes described in this privacy policy.

## Definitions

When we refer to 'we', 'us', and 'our', we mean Digital Unite Ltd.

We also refer to 'personal information' and by this we mean information which relates to or is obviously about you, or from which you can be identified.

When we refer to a 'sponsoring organisation' or 'client organisation', we mean the organisation that is paying for a Digital Champion's membership of the Digital Champions Networks and has acquired this membership from Digital Unite Ltd.

## Processing your personal information

We collect, use and are responsible for certain personal information about you.

When we do so we are subject to certain data protection laws, including the General Data Protection Regulation (GDPR) if you are in the EU, the UK GDPR if you are in the UK and the Data Protection Act 2018. We are responsible as 'controller' of that personal information we process for the purposes of those laws.

We may collect personal information about:

- visits to our websites
- enquiries about our products or services
- information obtained through our 'get in touch' forms on both the Digital Unite and Digital Champions Networks websites
- Information in enquiry, feedback or event-booking forms
- information you provide in application forms or order forms
- telephone calls to and from Digital Unite Ltd are never recorded.

In addition, we collect the following data about Digital Champions who use our Digital Champions Networks service.

\* indicates a mandatory field

- First and last name\*
- Email address\*
- Password\*
- City
- Country
- IP address
- Current level of awareness about digital exclusion and its impact\*
- Current level of knowledge in supporting others to improve their digital skills\*
- Confidence to support others to improve their essential digital skills\*
- Main reason for being a Digital Champion\*
- Business unit/department\* (Inspire only)
- eLearning courses started and completed

The Digital Champions Networks can also monitor a Digital Champion's session with an end learner. The data captured here is specified by the Digital Champion's sponsoring organisation but may include:

- Date of session
- Time spent helping
- Number of people helped
- Topics covered
- Any anecdotal comments on the session

## How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- you have given consent—where we need your consent, we will ask for it separately of this privacy notice and you can withdraw consent at any time;
- to comply with our legal and regulatory obligations;
- to fulfil our contract with you/your employer or take steps at your request before entering into a contract; or
- for our legitimate interests.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or that the processing is required to establish, exercise or defend legal claims.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services/products to you	To fulfil our contract with you or to take steps at your request before entering into a contract
Providing services/products to your organisation	For our legitimate interest, i.e. as a contact person to facilitate and maintain a business relationship with your organisation
Receiving services/products from you	To fulfil our contract with you or to take steps at our request before entering into a contract

What we use your personal data for	Our reasons
Receiving services/products from your organisation	For our legitimate interest, i.e. as a contact person to facilitate and maintain a business relationship with your organisation
Preventing and detecting fraud against you or us	For our legitimate interests, i.e. to minimise fraud that could be damaging for you or us
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests, ie to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests
Ensuring internal business policies are complied with, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, services range or other efficiency measures	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems	Depending on the circumstances: —for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us —to comply with our legal and regulatory obligations
Statutory returns	To comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
Marketing our services to existing and former customers and third parties	Depending on the circumstances: —for our legitimate interests, i.e. to promote our business —consent
External audits and quality checks, such as the audit of our accounts to the extent not covered by ‘activities necessary to comply with legal and regulatory obligations’ above	Depending on the circumstances: —for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards —to comply with our legal and regulatory obligations
To share your personal data with members of our and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets

## Cookies

A cookie is a small text file that is placed on your device when you visit a website. Cookies help websites work properly and give us information about how people use our site so we can improve it. When you first visit our website, you will be asked to accept or reject non-essential cookies.

You can:

- accept all cookies
- reject non-essential cookies
- change your preferences at any time via [insert link to cookie settings/banner]

You can find out more in our Cookie Policy available on our policies page: [Our policies | Digital Unite](#)

## Marketing

We may use your personal data to send you updates (e.g. by email or social media channels) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. Where this is not the case, we will always ask for your consent.

In all cases, you have the right to opt out of receiving marketing communications at any time by:

- contacting our Data Protection Manager (see '**How to contact us**' below);
- using any 'unsubscribe' link in emails.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations outside of the Digital Unite for marketing purposes.

## Who we share your personal data with

- Your client organisation. Digital Unite sells membership of the Digital Champions Networks to individuals and to client organisations. Digital Champions self-enrol on the Digital Champions Networks using a registration code that is created by Digital Unite. Where a client organisation buys a membership, they can then recruit their Digital Champions and distribute the registration codes which Digital Unite has provided to them. Only the client organisation can access their own Digital Champions' personal information, in addition to Digital Unite.
- Third parties we use to help deliver our services to you, e.g. providers of our CRM, finance system and other software platforms, IT service providers including cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments.
- Third party external advisors, e.g. lawyers, tax advisors, accountancy and technology service providers, or law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.

- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be possible and the recipient of any of your personal data will be bound by confidentiality obligations.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We ensure all outsourcing providers operate under service agreements that are consistent with our legal obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

## Where your personal data is held

Personal data may be held at our offices, third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the EEA. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data abroad**'.

## How long we keep your personal information

We will not keep your personal data for longer than we need it for the purpose for which it was collected or as required by law.

As a general rule of thumb, we will keep your personal data for at least seven years from the conclusion of any contractual relationship we have with you. However, different retention periods apply for different types of personal data and for different services. For example, any data held on our Digital Champions Network is normally deleted 12 months after the client organisation ends their membership.

Specific retention periods for Personal Data we processes is outlined in our Retention Schedule, a copy of which is available on request (see '**How to contact us**' below).

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

## Transferring your personal data abroad

It is sometimes necessary for us to transfer your personal data to countries outside the European Economic Area (EEA). This may include countries which do not provide the same level of protection of personal data as the EEA.

We will transfer your personal data outside the EEA only where:

- the European Commission has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy decision); or
- there are appropriate safeguards in place (eg standard contractual data protection clauses published or approved by the relevant data protection regulator), together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under data protection law.

You can contact us (see '**How to contact us**' below) if you would like a list of countries benefiting from a European adequacy decision, for copies of any appropriate safeguards we have implemented or for any other information about protection of personal data when it is transferred abroad.

## Security

We take appropriate organisational and technical security measures to protect personal information that we hold against unauthorised disclosure or unlawful processing. Personal information transmitted to our websites is held on secure servers and encrypted. However, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your information transmitted to our websites; any transmission is at your own risk.

We require our business partners, suppliers and other third parties to implement appropriate security measures to protect personal data from unauthorised access, use and disclosure.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are required to do so.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data.
Rectification	The right to require us to correct any mistakes in your personal data.
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations.
Restriction of processing	The right to require us to restrict processing of your personal data—in certain situations, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time. You may withdraw consents by contacting our DPM (see ' <b>How to contact us</b> ' below). Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- provide enough information to identify yourself (e.g. your full name, address) and any additional identity information we may reasonably request from you;

- let us know what right you want to exercise and the information to which your request relates.

We will respond to all requests within 40 days of having received the request.

## How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Information Commissioner is the UK's independent body set up to uphold information rights.

## Changes to this privacy notice

We may change this privacy notice from time to time. When we do we will publish the updated version on our website.

## How to contact us

You can contact us or our Data Protection Manager by post, email or telephone if you have any questions about this privacy notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

<b>Our Data Protection Manager's contact details</b>
Emma Weston, Digital Unite 18 Hundred Acres, Wickham, Fareham PO17 6JB  <a href="mailto:du@digitalunite.com">du@digitalunite.com</a> 0800 2289272