

## Customer Services: Education Sumdog Privacy Notice Your Personal Data

### What information do we need?

Argyll and Bute Council will act as the 'Data Controller' in regard to the personal data you provide to us. The Data Protection Officer can be contacted at the Council's headquarters is at Kilmory, Lochgilphead PA31 8RT. The email address is: [data.protection@argyll-bute.gov.uk](mailto:data.protection@argyll-bute.gov.uk)

Glassary Primary School has made a decision to use software called Sumdog to provide you with Education services. This means that personal information about you that you have previously provided in order to receive Education will be shared with this company. This information is contained in the General Education Privacy Notice which can be found on the Council website at <https://www.argyll-bute.gov.uk/data-protection#privacy> . The personal data will include your first name and the initial letter of your surname, together with your year stage, class and school.

### Why do Sumdog need this information?

Your information is being collected to allow use of the software that is needed to support your numeracy and literacy. There are enhanced benefits to the pupil, parents/carers and the school in using this tool.

The legal bases for collecting your information in these circumstances are:

Article 6(1)(e) – Public Task on the basis of the legal obligation placed on the Education Authority to track and monitor pupil progress and to raise attainment in terms of the undernoted legislation:

- Education (Scotland) Act 1980
- Education (Additional Support for Learning) (Scotland) Act 2009
- Scottish Schools (Parental Involvement) Act 2006
- Standards in Scotland's Schools etc. Act 2000
- Children and Young People (Scotland) Act 2014

### What we will do with your information?

The information Sumdog collects from you will be processed in the United States of America. This information is protected by a Data Sharing Agreement which commits to providing an equivalent level of protection to the GDPR.

Your information will be shared with the recipients or categories of recipients as detailed below:

What we will do with your information	
Who we will share with	Reason for Sharing
Sumdog	Sumdog provide valuable tools to support the learning of numeracy and literacy. To do this they require individual pupil accounts which are identified with first name and initial.

You should also be aware that your data may be downloaded from Sumdog by Glassary Primary School and will be stored on school servers located within the United Kingdom. We will take all reasonable steps to ensure that your data is kept securely and more information on how we do this is provided on the Council website ([www.argyll-bute.gov.uk](http://www.argyll-bute.gov.uk)) or can be provided in paper format on request to your School Support 01369 704000.

### How long will Sumdog keep your information?

Personal data will be held in Sumdog for as long as the pupil is using the service. Data will not be stored for a period of longer than 9 months if the account becomes inactive. However if you actively choose to leave Sumdog the personal data associated will be deleted within 30 days. Schools will delete pupil records when they leave the school (deletion will be requested within 90 days).

Data downloaded from Sumdog by the school will be kept as detailed in the General Education Privacy Notice. More information on Argyll and Bute Council's retention schedule is provided on the Council website ([www.argyll-bute.gov.uk](http://www.argyll-bute.gov.uk)) or can be provided in paper format on request to School Support 01369 704000.

### Your Rights

When you provide information to the Council, you will have the following rights:

- to withdraw consent at any time, where the legal basis specified above is consent
- to lodge a complaint with the Information Commissioner's Office
- to request access to your personal data
- to data portability, where the Legal basis specified above is i) consent or ii) performance of a contract
- to request rectification or erasure of your personal data, as so far as the legislation permits

If you would like this document in an alternative format, such as a hard copy, please contact Glassary Primary School on 01546 605219.

You can find out more about your rights in relation to data protection here: [www.argyll-bute.gov.uk/data-protection](http://www.argyll-bute.gov.uk/data-protection) or from the Data Protection Officer by telephone or in writing, as detailed above.

### Information Commissioner's Office

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

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

The Information Commissioner's Office – Scotland

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0303 123 1115 Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)