



Privacy Policy.

We take your privacy very seriously. Please read this privacy policy 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 supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Bromcom is a company that:

- Keeps a record about Bromcom staff, suppliers, customers and potential customers,
- Supplies Management Information System software and services to schools and organisations that oversee schools such as local authorities (LAs) and Multi Academy Trusts (MATs).
- Supplies education based information to parents and guardians of pupils via the MyChildAtSchool website. Also provides an online payment facility via the MCAS website.

In view of GDPR, Bromcom is a data processor and Bromcom's customers are the data controllers.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Bromcom Computers Plc Rutland House, 44 Masons Hill, Bromley, England, BR2 9JG Company no.: 02040690
You	Bromcom's customers, the customer's students and staff, website users
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data (when processed to uniquely identify an individual) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to



Personal data we collect about you

We may collect and use the following personal data about you and your organisation's staff/students:

- name and contact information, including email address and telephone numbers and company, details
- information to check and verify you/your organisation's staff/student's identity
- location data
- Information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions
- your account details, such as username and login details.
- student information
- staff information
- parent/guardian information
- recordings of phone calls to the following teams: onboarding/deployment, migration, training, helpdesk and customer care (together "Customer Service")
- recording of webinars, presentation and other video calls

We collect and use this personal data to provide services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How your personal data is collected and where it is kept

We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- from a third party with your consent
- from cookies on our website—for more information on our use of cookies, please see our cookie policy below.

Cookie Policy

We use cookies on <https://www.bromcom.com> for statistical purposes to track how many unique users we have and how often they visit the Bromcom website. Data we collect includes which of our pages are most



frequently visited, and we use this information to continually improve our website. The data collected and stored is anonymous and does not contain any personal data or identify you. We also use targeting/advertising cookies- these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.

Necessary cookies: Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Statistic cookies: Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Throughout the Bromcom Computers Plc website we may link to other websites owned and operated by third parties. These other third party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third party websites, please consult their policies as appropriate.

Bromcom uses Google Analytics, a web analytics service provided by Google inc. Google Analytics sets the following third-party through this website in order to evaluate your use of the site and compile reports for us on activity:

_utmaGoogle AnalyticsGeneral tracking code

_utmbGoogle AnalyticsGeneral tracking code

_utmcGoogle AnalyticsGeneral tracking code

_utmzGoogle AnalyticsGeneral tracking code

Google stores the information on servers in the USA. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Information on how to reject or delete the Google Analytics cookie can be found at: <http://www.google.com/intl/en/privacypolicy.html> privacy policy link.

Please note other websites to which this website may be linked, may also make use of their own cookies.

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, eg:

- where you have given consent;



- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

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

What we use your personal data for	Our reasons
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interests or those of a third party, ie to minimise fraud that could be damaging for you and/or us
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie 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, monitoring and quality control	Phone recordings: For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price Telephone/webinar/demo video recordings: Consent.
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for you and/or us To comply with our legal and regulatory obligations
Updating and enhancing customer records	To perform our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products



Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: –existing and former customers; –third parties who have previously expressed an interest in our services; –third parties with whom we have had no previous dealings.	For our legitimate interests, ie to promote our business to existing and former customers
External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

- we have your explicit consent;
- the processing is necessary to protect you (or someone else’s) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

Telephone recording

We may record telephone calls you make to us to:

- check for mistakes
- train staff and quality assurance purposes
- prevent, detect and investigate fraud
- help plan and make improvements to our services.

We do this in the interest of offering a good service to our customers and improving our services, which are our legitimate interests to processing the data. If you object to this, please find alternative methods of communicating with us e.g. by email.



Sometimes, calls may not be recorded if:

- there's a technical fault with the telephone system,
- a call handler is using equipment which does not let calls be recorded.
- you've been transferred to a line which does not record calls.

Your call recording may be shared with other organisations if they have a legal right to it.

We will delete call recordings 12 months after the call was made.

Recordings of webinars/presentations/demos videos on Microsoft Teams

We may record the above to:

- check for mistakes
- train staff and for quality assurance purposes
- prevent, detect and investigate fraud
- help plan and make improvements to our services

We do this in the interest of offering a good service to our customers and improving our services. We will ask your permission to record.

Sometimes, calls may not be recorded if:

- there's a technical fault with the system,

Your call recording may be shared with other organisations if they have a legal right to it.

The retention period is 6 months after the call was made. For more information on how Microsoft MS Teams record stored the record the recording, see here: [Use OneDrive for Business and SharePoint for meeting recordings - Microsoft Teams | Microsoft Docs](#)

Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) 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. However, where consent is needed, we will ask for this separately and clearly.



You have the right to opt out of receiving marketing communications at any time by:

- contacting us at legal@bromcom.com for marketing opt-out;
- using the 'unsubscribe' link in emails or 'STOP' number in texts
- 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 share it with other organisations for marketing purposes.

Who we share your personal data with

We routinely share personal data with:

- Third parties we use to help deliver our services to you, eg payment service providers
- Any third party as requested by our customers e.g. to a third party software application such as "Cashless Catering". Such third party links are at the sole discretion of the customer.

We only allow our service providers to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may also need to:

- share personal data with external auditors, eg in relation to ISO accreditation and the audit of our accounts;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

Bromcom hosts all of its cloud hosted MIS services on the Microsoft Azure Platform and these services are run exclusively from the UK North and UK South Azure Regions, therefore all data stored on the Bromcom MIS cloud hosted solution remains in the UK only.

Parents and Guardians using the MCAS website for online payments, Bromcom will only process data for the purposes of facilitating payments and no payment card data is stored by Bromcom. Some data in this process may be transferred outside of the EEA by sub data processors, although this would be done subject to the safeguarding procedures of the payment service providers.

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



We will not share your personal data with any other third party.

Where your personal data is held

Personal data may be held at our offices and those of our service providers, representatives as described above (see above: 'Who we share your personal data with').

How long your personal data will be kept

We will keep your personal data while you have an account with us, or we are providing services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data e.g call recordings which are kept for 12 months.

Should a Bromcom customer reach the end of a contract with Bromcom to provide its services, the data of the customer is made available for download from a secure site or by any other acceptable and secure method. Once downloaded by the customer the data is deleted by Bromcom.

A copy of the customer's data is available to the customer at any time during its contract with Bromcom, upon request.

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 circumstances, eg 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, eg processing carried out for the purpose of our legitimate interests.
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

For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

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 (*eg your full name, address and customer or matter reference number*) 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.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

We also have procedures in place 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 legally required to do so.

How to complain

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

You also have the right to lodge a complaint with the Information Commissioner [or any relevant European data protection supervisory authority]. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was last updated on 20/01/2022

We may change this privacy notice from time to time—when we do, we will inform you via *our website or other means of contact such as email*.



How to contact us

Individuals in the UK

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

Our contact details are shown below:

Our contact details	Osman Erener
	Osman.Erener@bromcom.com

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