

## 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)

Dunbeg Primary has made a decision to use a company called Renaissance 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> . For the purposes of this specific service, the personal data we require includes *special category* information about you (also known as '*sensitive personal data*' which may include race / ethnic origin, religious beliefs or health details.

Dunbeg Primary School will share the following data with Renaissance:

Name, date of birth and gender

When we are using this more sensitive type of personal information, our legal basis is usually that we require the information for reasons of substantial public interest for aims that are proportionate and which contain appropriate safeguarding measures.

### Why we need this information?

*Your information is being collected to help improve literacy and numeracy by allowing staff to track and monitor progress on an individual targeted basis.*

The legal basis for collecting your information in these circumstances is:

UK GDPR Article 6(1)(e) – Public task on the basis of the obligations placed on the Authority to track and monitor pupil progress as outlined in the legislation below:

- 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

Article 9(2)(g) - Processing is necessary for reasons of substantial public interest on the basis of Union or Member State law which is proportionate to the aim pursued and which contains appropriate safeguards

There are enhanced benefits to the pupil, parents/carers and the school in using these tools.

### What we will do with your information?

The information we collect from you will be processed as detailed below:

- myON Product: Personal Data is stored on servers in the United Kingdom. Personal Data is accessible from the United States.
- All other Renaissance Products: Personal Data is stored on servers in the United States.

Where data is processed outwith the UK we take steps to make sure they provide an adequate level of protection in accordance with UK data protection laws.

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
Renaissance Learning including Accelerated Reader, Accelerated Maths, MyOn, Star Assessment and Freckle	To provide access to Renaissance Products: <a href="#">Privacy Hub</a>   <a href="#">Renaissance Learning % (renlearn.co.uk)</a>

You should also be aware that your data may be downloaded from Renaissance by Dunbeg Primary School and will be stored on school servers located within the United Kingdom. Your downloaded data may also be held as paper files which are stored securely in school. 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 we keep your information?

Personal data will be held by Renaissance as follows:

If a school chooses to not renew a contract the data will be deleted no more than 90 days from termination and within 180 days from the back up servers.

For Freckle Product Free-version customers' accounts that have been inactive for a period of 13 months will be deleted 1 month after that and within a further 3 months from the back up servers.

Data downloaded from Renaissance 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 School Support on 01369 704000.

#### **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, 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)