

## Privacy Notice

College Development Network, a company limited by guarantee (company number SC143514), whose registered office is Argyll Court, Castle Business Park, Stirling, Stirlingshire FK9 4TY (“CDN”) provides you with this privacy notice to explain how CDN may collect, use and share your personal information in relation to services we offer through our website at [www.collegedevelopmentnetwork.ac.uk](http://www.collegedevelopmentnetwork.ac.uk) (the “Website”) and other online and traditional communication channels. In this privacy notice, references to “we” and “us” (and connected words such as “our”) refer to CDN.

### SUMMARY

<a href="#">Information we collect.</a>	We collect information about you in connection with your registration with, use of or enquiries about our services. Most information we collect is non-sensitive personal information, but some information may be considered to be ‘sensitive’ personal information in terms of data protection legislation.
<a href="#">Using your information.</a>	We use your information to perform our functions and activities generally, provide our services, operate the Website, respond to your queries, provide you with support, process your payments, produce usage statistics for management and planning, and market our products and services.
<a href="#">Sharing your information.</a>	We may share your information with your employer with selected third parties, including our key partners and key stakeholders; and as required or permitted by law.
<a href="#">Marketing.</a>	We may use your information to send various marketing communications to you in accordance with applicable law and your preferences.
<a href="#">Storing your information.</a>	Most of your personal information is held within the EEA, although some non-sensitive personal information may be transferred to, and held at, a location outside the EEA. We take reasonable steps to prevent unauthorised access, or loss or damage, to your information.
<a href="#">Your rights.</a>	You have the right to be informed if we are processing your information, and the right to access information we hold about you, upon request.
<a href="#">Cookies.</a>	We use cookies across our Website. Please see further information in our <a href="#">Cookie Policy here.</a>
<a href="#">Changes.</a>	We will tell you about material changes to this privacy notice by posting it on our Website, before it comes into effect, and (where appropriate) notified to you by email.

Retention of your information.	We hold your information for as long as you are receiving our services and afterwards for as long as may be necessary for establishing, exercising or defending legal rights. This will generally be for a minimum of five years.
Contact us.	If you have any queries about how your information is being used or about this privacy statement, please contact us at <a href="mailto:info@cdn.ac.uk">info@cdn.ac.uk</a>

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### INFORMATION WE COLLECT.

**Registration information.** You may provide us with basic personal information when you contact us or register with us. This information may include non-sensitive personal information such as your name, postal address, email address and areas of interest, and may also include (for example, in relation to Chartered Management Institute and Scottish Qualifications Authority candidates registering with us) sensitive personal information, such as racial or ethnic origin, and physical or mental health or conditions.

**The Moodle LearnOnLine virtual learning environment (the “Moodle”).** In connection with our operation of the Moodle, which is accessible through and part of our Website, we hold course-specific tracking information in the form of Moodle logs which contain detailed information about user activity collected in relation to each course, including the date and time of when course-specific information was viewed and updated; the details of those updates; the user’s name, location and email address; information about contributions to courses; contributions to chat rooms and discussion forums; and evidence of participation in other Moodle-based activities.

**Booking events.** When you book a CDN event or course through the Website, you provide us with specific information including your email address, name, organisation or college, subject area, postal address and contact phone details.

**Survey Monkey.** If you choose to provide feedback on our events and courses, you provide data on an anonymous basis directly to Survey Monkey, a third party service provider. After each particular event or course, we obtain a report from Survey Monkey which contains that anonymised data. All feedback is trended and anonymous. Some specific comments you provide are taken as testimonials and used in marketing materials, but these comments are always anonymously attributed.

**Payment information.** We may provide you with an online payment facility for booking events and courses or purchasing other products from us, in which case you will be required to provide payment card information and other details to us or a third party service provider in order to process such payments.

**Technical data.** We collect information about how you use the Website and how you access our services, including your computer’s IP address and information that can be derived from it (such as your internet provider and geographic location). We collect some of this information using cookies and similar technologies.

## USING YOUR INFORMATION

**Performing our functions and activities.** CDN is a registered charity which supports and promotes the learning community in the college sector. Our core functions and activities depend on our relationships with key partners and key stakeholders at a college and strategic level. This is what allows us to ensure we design and deliver services that maximise value and benefits to the college sector. We use your information in relation to fostering these relationships with key partners and stakeholders to perform our functions and activities as an educational charity generally.

**Providing you with our services.** We use the information you provide us with in order to enable you to book events and purchase other products or services, to enable you to use our forums, to communicate with you about our products and services (for example, through our newsletter), and to manage your account.

**The Moodle.** We use the information we hold about you in connection with the Moodle to provide you with support, for system administration and bug tracking, and for producing usage statistics for management and planning purposes. Access to this information is restricted to designated course tutors, the senior learning technologist and the operations manager and other authorised CDN personnel. Information recorded through Moodle may also be used to create summary statistics which may be made publicly available, and may be shared directly with colleges and other relevant stakeholders. CDN may also share a user's name and evidence of such user's use of and/or participation in the Moodle with that user's relevant institution.

**Improving events.** We (and selected third parties to whom we may pass such data) use anonymised data provided to us through Survey Monkey to improve events and courses offered to you.

**Processing payments.** We use your payment card information and other details to process your transaction and to provide you with customer service and related support.

**Operating our services.** We use your information to ensure that content on our Website is presented in the most effective manner for you and for your computer; to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; to keep our Website safe and secure; and to notify you about changes to our services.

**Improving our business.** We also use your information to ensure that content is presented in the most effective manner for you and for your computer; and to perform, analyse and improve our Website, business and services.

**LEGAL BASES FOR PROCESSING INFORMATION.** We process your personal information, including any that would be considered to be 'sensitive' personal information, lawfully and fairly in accordance with data protection laws. We may process your personal information where: it is necessary for performing our functions and activities generally or for providing our services to you; you have consented to our processing of your personal information; we have a legal obligation to do so; or we have a legitimate interest to do so (for example, for fraud prevention purposes).

We are also subject to the requirements of the Freedom of Information (Scotland) Act 2002 (“FOISA”) and the Environmental Information (Scotland) Regulations 2004 (“EIRs”), and may be required under FOISA and the EIRs to disclose your personal information.

#### SHARING YOUR INFORMATION.

**Selected third parties.** We may share your information with selected third parties, including:

- Key partners, including the Scottish Government and the Scottish Funding Council
- Key stakeholders, including public sector and not for profit education agencies (such as Education Scotland, Skills Development Scotland, the Scottish Qualifications Authority, and the Scottish Credit Qualifications Framework)
- Awarding and accreditation bodies (such as the Chartered Management Institute and the Scottish Qualifications Authority), to enable candidates to proceed with the accreditation
- Schools, colleges and other relevant training establishments
- Your employer
- Other voluntary sector and not for profit organisations with whom we partner to deliver services

**Analytics.** We may share your information with analytics and search engine providers that assist us in the improvement and optimisation of our Website.

**Successor entity.** Your personal data may be disclosed to a successor organisation in the event that a third party organisation assumes the role of CDN and takes on the functions and activities of CDN

**Compliance with law.** We may share your information if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or to protect the rights, property, or safety of CDN, our customers, or others.

We may also share personal information with other parties as instructed by you or subject to your consent.

#### MARKETING.

Generally, during the course of our functions and activities and in providing our services to you, we will inform you if we are collecting information for marketing purposes.

We may use your information to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about. Where we have obtained your details in the course of a previous sale or negotiations of a previous sale to you, we may contact you by electronic means with information about services similar to those which were the subject of this previous transaction unless you tell us you do not want us to by opting out.

We may also use your information (or permit selected third parties) to provide you with information about services we feel may be of interest to you.

We may send you marketing material by email, by post, online and by any other communication channels, in accordance with applicable law and your preferences.

We may also send you service messages, which are essential for our services. These include messages relating to managing your account and to fulfilling your requests. If you opt out of receiving marketing messages, you will continue to receive these service messages.

#### STORING YOUR INFORMATION.

Most of the personal information that we collect from you is held within the EEA; however, some non-sensitive personal information may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the processing of your personal information and the provision of support services. By submitting your personal information to us, you agree to this transfer, storing or processing.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our site; any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

We follow strict security procedures in the storage and disclosure of personal information in order to ensure compliance with all applicable legal requirements, including by taking all reasonable steps to prevent unauthorised access or damage to, or loss or destruction of, personal information.

#### YOUR RIGHTS.

You have the right to be informed whether we are processing your information. You also have the right, to access, correct, delete or object to our use of your information. Any access request may be subject to a maximum of £10 to meet our costs in providing you with details of the personal information we hold about you. Please contact us by clicking [here](#) to exercise these rights.

You have the right to ask us at any time not to process your personal information for marketing purposes.

Our Website, from time to time, may contain links to and from the websites of our partner networks or affiliates. If you follow the link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### COOKIES.

We also use cookies and for detailed information on the cookies, please see our [Cookie Policy here](#).

#### CHANGES.

Any changes we make to this privacy notice in the future will be posted on this page and, where appropriate, posted as a prominent announcement on our Website. Please check back frequently to see any updates or changes to our privacy notice.

#### RETENTION OF YOUR INFORMATION.

We will hold your information for as long as we are providing our services to you and afterwards for as long as may be necessary for establishing, exercising or defending legal rights. This will generally be for a minimum of five years.

#### CONTACT US.

If you have any questions or comments about how CDN uses your personal information or about this privacy notice, or would like to exercise your rights, please contact us by [info@cdn.ac.uk](mailto:info@cdn.ac.uk)