**Link2ICT GDPR Statement**

On the 25 May 2018 the European Union’s General Data Protection Regulation (GDPR) formed part of the data protection regime in the UK, alongside the new Data Protection Act 2018 (DPA 2018).

The GDPR applies to ‘personal data’ which the Information Commissioner’s Office (ICO) defines as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”. The GDPR also applies to both ‘controllers’, who determine the purpose and means of processing personal data, and ‘processors’, who process personal data on the controller’s behalf. Our catalogue of services and your subscription to them will determine whether we are a Data Controller or a Data Processor.

**Link2ICT as a Data Processor**
Link2ICT is a part of Capita Birmingham Limited which is part of Capita PLC.

As a Data Processor, Link2ICT processes personal data on your behalf and will only ever act upon your instruction.

Link2ICT contacted all our Data Controllers and we asked you to identify your:
- Legal basis for processing
- Reason for processing
- Types of data subjects
- How long you want your data retained for

It is important that you return this information to us so that Link2ICT has a complete record of the processing that we undertake on your behalf and to enable us to follow your instructions regarding data retention.

**Link2ICT as a Data Controller**
In order to support you and the services that we provide on your behalf, it is important for us to collect and manage data that will enable us to do this effectively. Your data is therefore managed (stored and processed) within our customer relationship management (CRM) portal - [The Link2ICT Portal](#), to provide accurate and relevant support that is unique to each customer.

The [Link2ICT Portal](#) is delivered through the secure, online solution ServiceNow; the GDPR compliance statement for which can be found here: [ServiceNow GDPR Statement](#)

**Updates to our Privacy Notices**
Link2ICT understands the value of data privacy and the importance of data privacy with regard to our customers where we act as a data controller. We have therefore updated our privacy notices to reflect this and to comply with the GDPR: [Link2ICT Privacy Policy](#)

**Data Retention**
Your data will be retained by Link2ICT for the duration of your service subscription(s) plus six years following subscription termination. Our data retention period has been selected as such because we operate as an advisory service to schools and other education establishments. The general retention period for an advisory service into education states:

(1) Retention of records relating to advice and support should equal the date of last action plus 3-6 years.
Where your data is held
Link2ICT and its partners, host your data based on the following principles and preferences, and so your data is either:

1. Hosted within the United Kingdom of Great Britain and Northern Ireland
2. Hosted within the European Economic Area, EEA (inclusive of the United Kingdom and Ireland)
3. There may be limited occasions where your data is either collected or hosted outside of the EEA through your use of a Link2ICT partner service. In those limited circumstances Link2ICT only uses partners that adhere to European Commission guidance on data transfer outside of the EU, particularly the EU-US Privacy Shield framework for data transfer to the United States (used by Google, Survey Monkey and Eventbrite). Your data will never be transferred to a non-EEA country that is not covered by these agreements.

Continued Compliance
To ensure that we comply with the new regulations, Link2ICT has been conducting numerous internal audits across the business to ensure compliance of all data driven processes, the governance of those processes and our own risk management controls. As an ISO20000 accredited organisation, our systems and controls have proven to be robust and are consistent with Link2ICT operating within the principles of GDPR.

As part of our commitment to GDPR compliance, we have and will continue to build upon our existing controls and processes to further invest in all areas including:

1. Further training and assessment of all employees’ understanding of all the GDPR principles including ‘privacy by design’ as part of their annual mandatory GDPR compliance training
2. Initial and ongoing training and assessment of all employees’ understanding of the principles of information security as part of our ISO20000 accreditation
3. Intensive reviews of data asset retention and deletion practices for both structured and unstructured data across the business
4. Business wide review of company policies, processes and procedures to ensure they reflect new GDPR processes and controls
5. Consistent campaign of internal and external communications on raising awareness and understanding of the GDPR
6. Updating our terms and conditions to ensure that the respective roles of controller and processor are clearly identified together with their respective obligations and liabilities

Third Party Provision
As compliance is a shared responsibility, we continue to work with our partners to determine their individual and ongoing compliance, and are currently compiling information from them. As you will be aware, supplier engagement is a continuous activity for Link2ICT and specific information about each of our third-party suppliers will be available upon completion.

Further information:
If you have any further questions, please email us at dp@link2ict.org or visit the Link2ICT Portal for more details.

Alternatively, you can write to us at Link2ICT, 5th Floor, Fort Dunlop, Birmingham, B24 9FD

Thank you

(1) As instructed in the BCC Corporate Retention Schedule and SCC Data Retention Schedule