

## Privacy Notice – eMonitoring - Staff

*This privacy notice has been written to inform staff of Hartlepool Aspire Trust, about how and why we process their personal data in relation to eMonitoring.*

### **Who are we?**

Hartlepool Aspire Trust is a 'Data Controller' as defined by Article 4 (7) of the UK GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The trust has appointed Veritau Ltd to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the trust is compliant with the UK GDPR and to oversee data protection procedures. Veritau's contact details are:

Schools Data Protection Officer  
Veritau Ltd  
County Hall  
Racecourse Lane  
Northallerton  
DL7 8AL  
[schoolsDPO@veritau.co.uk](mailto:schoolsDPO@veritau.co.uk)

01904 554025

*Please ensure you include the name of your school in all correspondence*



### **What eMonitoring software do we use?**

The trust uses Impero eMonitoring software. A copy of Impero's Privacy Notice can be accessed via this link: <https://www.imperosoftware.com/wp-content/uploads/2021/10/Impero-Product-Privacy-Notice.pdf>

### **What information do we collect and why do we collect it?**

By using Impero eMonitoring systems the trust collects, stores, and uses the following information to identify you and the information you have accessed:

- a. Username
- b. Computer
- c. Time
- d. Reason for the capture of information
- e. Attachments of relevant screenshots

## **The trust operates eMonitoring software for the following purposes:**

Compliance – Acceptable use Policy

## **Our lawful basis for processing your personal data is Article 6(1)(c) and 9 (2)(b) respectively:**

Article 6 (1) (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

9 (2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection.

## **Who has access to your personal data?**

Your information will only be made available to trust employees where there is a need to investigate the report. Only employees authorised by trust management may have access to this information.

## **Who do we share your personal data with?**

We will only share captured information with other agencies where there is a lawful reason to do so - for example to share with the police for the purposes of crime prevention.

## **How long do we keep your personal data for?**

Information which does not meet the trust threshold will be retained for 90 days.

Information which meets the trust threshold will be kept on your personnel file for 6 years after your leaving date.

## **What rights do you have over your data?**

Under the UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation,
- to request access to your personal data that we hold, and be provided with a copy of it,
- to request that your personal data is erased where there is no compelling reason for its continued processing.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the trust has handled your personal data. You can do so by contacting:

First Contact Team  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow Cheshire  
SK9 5AF  
[icocasework@ico.org.uk](mailto:icocasework@ico.org.uk) // 0303 123 1113