



# IT Services Privacy Notice



## Who are we?

Cantium Business Solutions (Cantium) is a Local Authority Trading Company owned by Kent County Council (KCC) via Kent HoldCo. Ltd. Cantium delivers a range of IT and related services to organisations including local authorities / public bodies, schools, academies and other educational settings and private companies. We aim to maintain the highest possible standards and seek to adopt best practice with regards to the way in which we manage and process data in the course of our business.

Cantium collects, uses and processes personal information about you. When we do so we adhere to the UK General Data Protection Regulation (GDPR), which was incorporated into UK law following Brexit, and which is supported by the Data Protection Act 2018 (DPA 2018). Depending on the service provided we are responsible as either a 'controller' or 'processor' of that personal information for the purposes of those laws.

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and their employees and other people with whom we interact in the course of undertaking our services. This Privacy Notice offers both our customers and their employees with meaningful and accessible guidance on our approach to handling personal data.

## Our Services

Cantium offers a number of IT and related services including:

- Project and Programme Delivery
- IT Consultancy, Enterprise Architecture as a Service
- IT Managed Services, encompassing:
  - Service Desk
  - Application Support
  - Enterprise Systems Management
  - Network Management
  - Hosting & DBA Services
  - Cloud Hosting & Operations
  - WAN/LAN Management
  - Firewall Management
  - Security Operations
  - Datacentre Management
  - Server Infrastructure Management



- Storage Infrastructure Management
- Database Management
- Microsoft 365 Management
- Public Cloud/Azure Management
- End User Device Infrastructure Management
- Enterprise technology transformation projects
- Education IT Services, encompassing:
  - MIS Hosting, Support & Consultancy
  - Anti-virus software
  - Installations
  - Disaster Recovery
  - Admin / Curriculum Services
  - GroupCall IDaaS
  - GroupCall Messenger
  - Mobile Device Management
  - Training
  - Technician Support
  - Remote Support Back-up
  - Office 365
  - Schools Broadband
  - Managed WiFi
  - Hardware/CSP/OVS



## About the information we collect, use and retain

In the course of providing IT services to our customers we collect and process personal information about our customers' employees and the data subjects they support e.g. service users, pupils, parents and guardians. This information may be provided directly by you, or by the customer organisation on your behalf. Information may be provided by means including online forms, email, telephone, post, live chat and virtual agent functionality. We may also obtain personal data from third parties with whom we liaise in providing a service to our Customers, or by a representative acting on your behalf.

Information may be shared with third party providers (e.g. third party applications) where the customer organisation uses these as part of the IT services we support.

The table below summarises the information we collect, use and retain for IT services, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
Project & Programme Delivery	This will be dependent on the specific project engagement but may include: <ul style="list-style-type: none"> <li>Name and contact details</li> <li>Identifiers</li> <li>Information regarding use of IT</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
IT Consultancy, Enterprise Architecture as a Service	This will be dependent on the specific project engagement but may include: <ul style="list-style-type: none"> <li>Name and contact details</li> <li>Identifiers</li> <li>Information regarding use of IT</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
IT Managed Services	This could include: <ul style="list-style-type: none"> <li>Name and contact details</li> <li>Personal and family details</li> <li>Identifiers</li> <li>Lifestyle and social circumstances</li> <li>Financial information</li> <li>Employment and</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  As required to support subject access requests, Freedom of Information requests and Environmental Information

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
	educational details <ul style="list-style-type: none"> <li>• Housing or social care needs</li> <li>• Visual images, such as photographs or CCTV recordings</li> <li>• Licences or permits held</li> <li>• Student and pupil records</li> <li>• Business activities</li> <li>• Special category data</li> <li>• Equalities data</li> <li>• Personal data relating to criminal convictions or offences</li> </ul>			Regulation requests
MIS Hosting, Support & Consultancy	This could include: <ul style="list-style-type: none"> <li>• Staff, pupil, parent/contact name, email address and contact phone number, ID documents</li> <li>• Special category data</li> <li>• Employment records</li> <li>• Academic records</li> <li>• Behaviour and</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  Information may be shared with the MIS provider where this is required for troubleshooting

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
	attendance records <ul style="list-style-type: none"> <li>• SEN data</li> <li>• Financial Information</li> </ul>			
Anti-virus software	This could include: <ul style="list-style-type: none"> <li>• Name and contact details</li> <li>• Identifiers</li> <li>• Employment details</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.		To provide the contracted services
Installations	This could include: <ul style="list-style-type: none"> <li>• Name and contact details</li> <li>• Identifiers</li> <li>• Network User Accounts</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
Disaster Recovery	This could include: <ul style="list-style-type: none"> <li>• Name and contact details</li> <li>• Identifiers</li> <li>• Network User Accounts</li> </ul>	From the customer organisation (as part of delivering the contracted services) or	Performance of contract	To provide the contracted services

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
		directly from the data subject.		
Admin / Curriculum Services	This could include: <ul style="list-style-type: none"> <li>• Staff, pupil, parent/contact name, email address and contact phone number, ID documents</li> <li>• Special category data</li> <li>• Employment records</li> <li>• Academic records</li> <li>• Behaviour and attendance records</li> <li>• SEN data</li> <li>• Financial Information</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  Information may be shared with the MIS provider where this is required for troubleshooting
GroupCall IDaaS	This could include: <ul style="list-style-type: none"> <li>• Staff, student, parent/contact name, email address, contact number, unique ID, family relationship</li> <li>• Date of birth, year group and</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  Information may be shared with the IDaaS provider where this is required for the provision of the services



Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
	registration group <ul style="list-style-type: none"> <li>• SEN data</li> </ul>			
GroupCall Messenger	This could include: <ul style="list-style-type: none"> <li>• Staff, student, parent/contact name, email address, contact number, unique ID, gender, job title, family relationship, preferred language</li> <li>• Date of birth, year group and registration group</li> <li>• Attendance records</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  Information may be shared with the Messenger provider where this is required for the provision of the services
Mobile Device Management	This could include: <ul style="list-style-type: none"> <li>• Username</li> <li>• Email address</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
Training	This could include: <ul style="list-style-type: none"> <li>• Staff names, email</li> </ul>	From the customer organisation (as part of	Performance of contract	To provide the contracted services

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
	addresses, contact numbers, business address, job title and unique identifiers <ul style="list-style-type: none"> <li>• Dietary requirements and allergies</li> <li>• Survey feedback</li> </ul>	delivering the contracted services) or directly from the data subject.	Vital interests (dietary requirement and allergies)  Legitimate interests (surveys)	
Technician Support	This could include: <ul style="list-style-type: none"> <li>• Staff, pupil, parent/contact name, email address and contact phone number, ID documents</li> <li>• Special category data</li> <li>• Employment records</li> <li>• Academic records</li> <li>• Behaviour and attendance records</li> <li>• SEN data</li> <li>• Financial Information</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
Remote Support Back-up	This could include: <ul style="list-style-type: none"> <li>• Personal data stored by the customer</li> </ul>	From the customer organisation (as part of	Performance of contract	To provide the contracted services

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
	which is backed up as part of the service	delivering the contracted services) or directly from the data subject.		
Office 365	This could include: <ul style="list-style-type: none"> <li>• Staff, student and parent names, email addresses, contact numbers and unique identifiers</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
Schools Broadband	This could include: <ul style="list-style-type: none"> <li>• Staff names and email addresses, IP address, URL addresses, web searches, active directory information</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  Information may be shared with KPSN (KCC) and the Web Filtering Provider where this is required for the provision of the services

Service	The information we collect	How we collect the information	Lawful basis	How we use and may share the information
Managed WiFi	This could include: <ul style="list-style-type: none"> <li>• Device names, applications used, administrator names and email addresses</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services
Hardware / CSP / OVS	This could include: <ul style="list-style-type: none"> <li>• Staff names, email addresses, contact numbers, address, Ip Address, Po Number and Customer Signature.</li> </ul>	From the customer organisation (as part of delivering the contracted services) or directly from the data subject.	Performance of contract	To provide the contracted services  Information may be shared with Microsoft where this is required for the provision of the services  Information may be shared with 3 <sup>rd</sup> party suppliers where the customer has requested quotes

As we have a contractual basis for collecting your personal data if you do not provide this we may be unable to provide the contracted services.



## How we use your personal information

We use your personal information:

- To provide IT service(s) to our customers
- To communicate with you on behalf of our customers where necessary in the course of providing services to our customer
- To fulfil statutory and contractual obligations
- To provide training and development opportunities to individuals and groups of staff on behalf of our customers

## How we use your information to make automated decisions

An automated decision is where an electronic system makes a decision using personal information without human intervention (e.g. monitoring your online activities and emails or events which trigger actions). This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the services we may offer you now or in the future.

Automated decision making is allowed in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration
2. Where it is necessary to fulfil our contractual obligations and requirements and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit consent and where appropriate measures are in place to safeguard your rights.

If an automated decision is made, based on any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must put in place appropriate measures to safeguard your rights.



## The lawful basis for which we collect and use your personal data

The lawful bases for which we collect and use your personal data are as follows:

- With your consent
- For the performance of a contract (please note this may be in relation to your own contract of employment with your employer or in relation to our contract of service with our customer)
- For compliance with a legal obligation
- Vital interests; or
- Legitimate interests

The lawful basis on which we collect and use special categories/sensitive personal data is as follows:

- For carrying out legal obligations or exercising specific rights in employment or social law
- Where it is necessary for the establishment, exercise or defence of legal claims or where the courts are acting in their judicial capacity
- We use consent where it is appropriate for us to do so

### How long your personal data will be retained

We will not retain your personal information for longer than is reasonably necessary in providing the service or as is required by law.

Upon expiry, any personal data which we are not legally obliged to retain, will be securely destroyed.

### When we will share your information

Other than as stated in the table above, we will share personal information with law enforcement, our regulators or other authorities if required by applicable law.

We will also share your personal information with internal departments or external third parties where it is necessary to administer our contractual relationship with you or where we have another legitimate interest in doing so (providing this is not overridden by your interests). Details of third party providers for specific services may be provided on request.

Customer information may be shared within the Kent HoldCo. Ltd. Group (Commercial Services Group) under a Data Sharing Agreement. The Agreement



reflects the requirements of the UK GDPR and DPA 2018. Where a customer organisation purchases multiple services from within the Group the following information may be shared where this is required to deliver the services: title, name, email address / contact details, employee number, job title, products/services consumed.

We may also need to share some of the categories of personal information with other parties where a transfer of the business takes place. Usually, information will be anonymised or pseudonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations and legally binding data sharing agreements.

## Where information may be retained

Information may be retained at our offices and those of our service providers, representatives and agents as described above.

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers/>

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the European Economic Area (EEA).

## Reliance on UK exemptions from the GDPR

We may use information in reliance on the exemptions under the GDPR where allowed e.g. where a claim to legal professional privilege would apply, in relation to the provision of confidential references or for the purposes of management forecasting (to the extent that such forecasting would be prejudiced by advance notification).



## Your Rights

Under the GDPR you have a number of rights which you can access free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties.

Please note: your request may delay or prevent us delivering a service to you. For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation: <https://ico.org.uk/>

If you would like to exercise a right, please contact [DPO@csltd.org.uk](mailto:DPO@csltd.org.uk) or write to Data Protection Officer, Cantium Business Solutions, 1 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4YT.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.





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.

## Who to Contact

Please contact [DPO@csltd.org.uk](mailto:DPO@csltd.org.uk) to exercise any of your rights, or if you have a complaint about why your information has been collected, how it has been used or how long we have kept it for.

You can contact our Data Protection Officer at [DPO@csltd.org.uk](mailto:DPO@csltd.org.uk) or by writing to Data Protection Officer, Cantium Business Solutions, 1 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4YT.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone 03031 231113.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This document was last reviewed in February 2023.