

smoothwall®

Smoothwall Monitor Privacy Policy



1. Contact Details

Your personal information is collected by [insert name of school] ("we"/"us"/"our"). You should speak to [the Head Teacher] if you have any questions on the below.

2. What Are We Doing?

We collect information to monitor your online activities and ensure your online safety. If we see that you are could be at risk (e.g. of bullying, self harm etc.) we screenshot the internet pages you have open and send these to [insert role of the individual notified (e.g. Head of IT)] along with a notification and a decision will be made how to respond. Information collected includes:

- **Information provided / generated when you use our IT system including:** your key strokes (what you type), and your school IT log-on details.
- **Special categories of personal data including:** in monitoring your online activities we may be able to infer information, or you may provide information on your health, sex life, religion, disabilities etc.

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4. Why Are We Doing This?

We will use the information collected from you because: (1) we have a legal obligation to keep children safe online; (2) we have a legitimate interest in safeguarding children at school and ensuring staff only visit appropriate websites. We use the special information collected about you because we have a legal obligation to keep you safe online and an interest in preventing unlawful acts or where this is necessary to protect your vital interests.

5. Information That We Share

We share this data with Smoothwall Limited (this is the company which provides our monitoring software) and Smoothwall Inc. so that these companies can provide support to us when required. We also share the data with Crisp Thinking who assist Smoothwall in providing our monitoring services. We will also share this data with third parties as required by law.

6. Retention of Your Information

We will keep your personal information for up to 15 months.

7. Where Your Information Will Be Held

Your information will be primarily held in the UK, and may be accessed by Smoothwall Inc. in the USA. When we transfer data to the USA we ensure that your data is adequately protected (e.g. by ensuring that there is an appropriate contract in place or that the party to which we are sending data to meets a specified privacy standard). Let us know if you have any questions on this. We will also share this data with third parties as required by law.

8. Your Rights

You have the following rights in connection to your information subject to the law: the right to access, correct, delete, limit, transfer and object to what we do with your information. You

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also have a right to complain to a supervisory authority. Please contact us on the details above if you want to exercise these rights.