

The Hub – Privacy Statement

The basics

This virtual learning environment (the “Hub”) is provided by The Brilliant Club, to allow pupils and tutors who are working together to interact in a safe and accessible way. The Brilliant Club (we, or us) is a charity registered with the Charities Commission in England and Wales under registration number 1147771, and Scotland under SC048774, with our registered office at 17th Floor, Millbank Tower, 21-24 Millbank, SW1P 4QP. We are the **data controller** for all personal data in the Hub.

In order to participate in the Programme, we need you to use the Hub and accept its terms and conditions, including this privacy statement.

The Hub is hosted using Amazon Web Services, using servers based in the United Kingdom. They are a **data processor** for the Hub.

We process your personal data (including any special categories of data / sensitive personal data that you disclose on the Hub) so that we can provide our services and deliver our programmes. To set up a profile on the Hub we use personal details including: your full name, school name / placement school name, year group (pupils only) and email address.

We process your personal data in the Hub to allow tutors and pupils to engage with each other between tutorials during the Programme, in order to further pupil learning, and achieve our programme and charitable objectives.

Your data will be added to the Hub by us, and when you interact on the Hub, you will add further personal data yourself. This may on occasion include some limited personal information in the categories identified as particularly sensitive by data protection law, if included in the communications that you upload or post to the platform – for example, information as to physical or mental health, religious or similar beliefs, political opinions, racial or ethnic origin or criminal convictions. We do not use this information except in the provision of the Programme to you.

In order to administer the Programme, and to monitor, evaluate, and research the effectiveness of the programme, we will only use your personal data in the Hub in accordance with this privacy statement. At all times we will comply with current data protection laws in all relevant jurisdictions.

The GDPR

Please see our general [privacy statement](#) for more information on the General Data Protection Regulation (GDPR).

Data Collection and Processing

For the purposes of the Hub, we will collect your personal data in the following ways:

1. *Information you, or your school, gives us:*

Pupils: When your details are registered with us at the start of the Programme, we will use this data to create a profile for you and to put you in contact with the correct tutor and resources via the Hub.

Tutors: When you are placed as a tutor on the Programme, we will create or update a profile on the Hub for you so that you can access the correct pupils and resources via the Hub.

2. Information we get from your use of the Hub:

Pupils and Tutors: We will receive information about the actions you take and interactions that you have on the Hub.

3. Information that is relayed to your profile on our customer relationship management (CRM) software

Pupils and Tutors: Our Hub is integrated with our CRM software, Salesforce, so information about your interactions and actions on the Hub will be saved to your profile on our central Salesforce system

Sensitive Personal Data

Data protection law recognises that certain categories of personal information are more sensitive than others. This is known as 'sensitive personal data' or 'special categories of data' and includes health information, race, religious beliefs and political opinions (please note that this is a non-exhaustive list). We will not add any sensitive personal data to the Hub however, we will process any sensitive personal data that you reveal on the Hub on the basis that you have consented to us holding it by disclosing it.

Legal Basis

We must have a **legal basis** to process your personal data. The legal bases we rely upon to process your personal data within the Hub are as follows:

- To fulfil a contractual obligation that we have with you or a partner organisation – *we have entered into an agreement with you to provide the Programme to you, and this Hub is one of the ways in which we provide the Programme;*
- Your consent - *where you provide personal information on the Hub;*
- Where we have a legitimate interest – *this is the basis we use where the other bases do not apply; you can find more details about our legitimate interests below.*

Legitimate Interest

This is where we have a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where we have relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- For monitoring, evaluating, and researching the effectiveness of our programmes;

Sharing your data

Your privacy is important to us, and we will not share your personal data with any third parties save for the **data processors** mentioned above who we have suitable contracts in place with, and very occasionally, with your school or local authority where we have concerns for your wellbeing or the wellbeing of another person as a result of items that you have posted on the Hub.

In order to flag any concerns, we regularly monitor the chat function of the Hub using technology which highlights key words which might alert us to a safeguarding concern.

Cookies

The Hub uses cookies to manage functionality. Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the site or a third-party to recognise you and make your next visit easier and the site more useful to you. The information received from cookies supports us to make user experience better and to generally improve our services.

Functionality cookies are useful for remembering your username in the login field, maintaining your session and remembering previous actions, and keeping you logged in (if selected).

Preferences cookies store your preferences, such as language and text size, so that they can be remembered the next time you log in.

Performance cookies, primarily Google Analytics, are used to collect information about you use our site. These cookies help us to understand popular pages, time spent on pages, etc. Individual users are not identified, and the information collected is used purely to help improve usability of the site.

Overseas Transfers

Data entered into the Hub will not be transferred outside the European Economic Area.

Data Retention

We will retain your personal data only for as long as is necessary for the purposes we collect it for and never longer than seven years. We will anonymise any data which is retained for longer than this period.

Your Rights / Rights of the Data Subject

Please see our general [privacy statement](#) for further information about your rights as a data subject.

Complaints or Queries

Please see our general [privacy statement](#) for further information about how to make a complaint about us.

Data Security

Please see our general [privacy statement](#) for further information about how we keep data secure.

Reporting Data Breaches

Like all organisations, we are required to report breaches in data protection procedure to our supervisory authority, the ICO. In line with the GDPR, where a breach is known to have occurred which is likely to result in a risk to your rights and freedoms, the ICO will be informed within 72 hours. We may also decide to contact you in certain instances.

Changes to this Privacy Statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.