

Canvas Learning Platform Privacy Notice

The Data Lab is committed to preserving your privacy. This notice sets out how The Data Lab (“we”, “our” and “us”) uses personal information that we collect from you when you use The Data Lab’s Learning Platform.

As a Scottish Innovation Centre, The Data Lab is administered and hosted by the University of Edinburgh meaning that we are the same legal entity. The University of Edinburgh is a registered charity with registration number SC005336.

For the purpose of the General Data Protection Regulation, the data controller is the University of Edinburgh with offices at Old College, South Bridge, Edinburgh, EH8 9YL, Information Commissioner’s Office Registration Number Z6426984.

This privacy notice applies to any registered or registering users of the Learning Platform.

The Data Lab uses a solution called “Canvas” which provides the basis of the Learning Platform. Canvas is provided by Instructure Global Limited (“Instructure”). Instructure acts as our Data Processor under the General Data Protection Regulation. Instructure will process personal data strictly for the purposes of operating the platform. The Data Lab has a contract in place with Instructure to ensure they are obliged to protect your personal information.

Please note The Data Lab offers other services which are provided under different privacy notices. For example, if you use our website www.thedatalab.com or attend an event hosted by The Data Lab, the relevant privacy notice is - <https://www.thedatalab.com/privacy-policy>. If you are unsure which privacy notice applies, please contact us.

Information About You

We may collect the following information from you.

INFORMATION COLLECTED	REASONS FOR COLLECTING IT	LEGAL BASIS
Contact Information: Name, email address	We collect this information so that we can provide you with access to the Learning Platform and inform you of any updates, changes or other useful information in relation to your use of the Learning Platform. If you opt in to our marketing emails we will use your email address to provide you with updates	Contract – we collect this information in order to fulfil our agreement with you to provide access to our Learning Platform Consent – We only send you these emails where you have provided your consent.

INFORMATION COLLECTED	REASONS FOR COLLECTING IT	LEGAL BASIS
	relevant to The Data Lab and the Learning Platform.	
Professional Information: Details about your job role, where you are based, the sector you work or study in, areas of interest, qualifications, work history	We collect this information to help us assess whether the content on the Learning Platform is suitable for our users and to help us improve on this.	Legitimate interests – to enable us to continually improve the Learning Platform and tailor our content
Gender	We collect this information as we wish to make sure the Learning Platform allows equal opportunities and to be able to assess and improve upon the accessibility of the Learning Platform.	Legitimate interests – to ensure and improve on equality
Payment Information: If you decide to purchase paid for content we will process your payment details	Where paid for content is available and you wish to purchase, we will require your payment information to facilitate this.	Contract – to enable you to fulfil your obligation to pay us for content (where you decide to purchase this)
Information provided by you when using the Learning Platform: any additional personal information you choose to upload to the Learning Platform	The Learning Platform is an interactive place which allows members to upload their own content and interact with other members. If you choose to upload any personal information e.g. a profile photo this will be stored on the Learning Platform.	Consent – you are not obliged to contribute any personal information to the interactive areas of the Learning Platform and to do so will be at your own choosing.
Cookies Information: Information collected about you by way of cookies: this may include your IP address, browser type, operating system, country you are browsing from.	Cookies are used to help ensure proper functioning of the Learning Platform.	If any cookies are used other than those which are strictly necessary, you will be asked for consent. The provider of the platform, Instructure, manages the cookies used on the platform. Please see further information here: https://www.instructure.com/policies/privacy

INFORMATION COLLECTED	REASONS FOR COLLECTING IT	LEGAL BASIS
Demographics Information: information including in relation to disabilities, ethnicity	We collect this information for equalities monitoring - as we wish to analyse whether the Learning Platform allows equal opportunities and to be able to improve upon this.	We collect this information via an anonymous form on Microsoft Forms. We use the information for aggregated statistics and do not collect your personal information in relation to these questions. You can choose whether or not to answer these questions.

Sharing Tools and Linking to Other Websites

The Learning Platform links to third party integrations such as Badgr, Youtube and polling tools. When you use these third party tools, the third party site may place cookies on your computer. If you have any questions about the use of these third-party cookies, you should check the relevant social site's cookie policy.

As we want your experience of our Learning Platform to be as informative and useful as possible, we may provide links to websites operated by third parties. Please be aware that we do not have any control over third party websites and that such third party websites may send their own cookies to users, or otherwise collect data or solicit personal information.

We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such third party websites and so these are not governed by this privacy notice. We encourage you to review each third party website's privacy notice before browsing and interacting with the website in question.

Retention of Your Information

Your personal data will be retained for the duration of our Learning Platform being in existence. Once our agreement with the platform provider, Instructure, ends, Instructure will delete your data within 90 days. You can also request for your personal data to be deleted and this will be carried out as soon as reasonably possible.

We may retain your personal data for longer than is set out above if reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our acceptable use policy and terms of use, or fulfil your request to opt out from further messages from us from the Learning Platform. As a Scottish Innovation Centre, we may have to comply with statutory retention periods as required by our funders.

Disclosure of Your Information

We will never sell or trade your personal information to others.

We use third party service providers and suppliers to deliver certain services. We put contractual arrangements in place with these third parties to ensure they are obliged to protect your personal information.

We only share your personal information where it is reasonably necessary to properly administer our business and/or to comply with law / regulations.

As noted above, Instructure is the provider of the platform and will process your personal data for the purposes of providing the platform. Please see Instructure's privacy policy for further information about how they protect personal data: <https://www.instructure.com/policies/privacy>

The following third parties may have access to your personal information:

- Software providers – where necessary for providing the Learning Platform -this includes Amazon AWS which hosts the Instructure platforms and Stripe which is the payment processor.
- Regulators, government departments, law enforcement authorities, tax authorities, accountants, insurance companies, professional advisers, dispute resolution bodies or the courts – where necessary to comply with law or enforce or rights; and
- Scottish Funding Council, Scottish Government, Scottish Enterprise and/or Highlands and Islands Enterprise – as a Scottish Innovation Centre we have certain reporting duties to our funders.
- Consultants – we use third party consultants where we require specialist assistance to deliver our services and where these are required on a short term or ad hoc basis.

Some of these entities may also be data controllers but please contact us in the first instance if you have any questions.

Please also note that other users of the Learning Platform will be able to view any personal information in your public profile or which you post to any interactive features on the Learning Platform.

Location of Your Information

The information we collect from you may be stored inside the UK, the European Economic Area ("EEA") or outside the EEA.

If you live or work outside of the EEA, we may need to transfer your personal information outside of the EEA to correspond with you. Where this applies, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice.

We may transfer personal information outside the EEA where our service providers host, process, or store personal information outside the EEA. Where this is the case we use contractual arrangements and safeguards to protect this personal information, these safeguards include:

- The country to which the personal information will be transferred has been deemed to provide an adequate level of protection for personal information by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.

If you would like more detail on this, please contact us.

Security

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted online or through the Learning Platform. Any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

Continuation of the Privacy Notice

Please find the second part of our privacy notice here: <https://www.ed.ac.uk/data-protection/notice>. This is the generic part of every University of Edinburgh privacy notice.

Contact Details

Please help us keep our records updated by informing us of any changes to your e-mail address and other contact details.

If you have any questions about this privacy notice, including if you wish to exercise any of your rights, please contact us at info@thedatalab.com with the subject line “privacy notice”.

Our Data Protection Officer is contactable by email at dpo@ed.ac.uk.