Data protection

Privacy notice

How TLG collects, uses and protects the personal data of its customers

Contents

1. Information about us 4
2. What does this notice cover? 4
3. What is personal data? 5
4. What are your rights? 5
5. What personal data do we collect and how? 6
6. How do we use your personal data? 7
7. How long will we keep your personal data? 9
8. How and where do we store or transfer your personal data? 9
9. Do we share your personal data? 10
10. How can you access your personal data? 10
11. How to complain. 11
12. How do you contact us? 11
13. Changes to this Privacy Notice 11

Appendix A – TLG companies 12

TLG understands 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 will only collect and use personal data in the ways described in this notice, and in a way that is consistent with our obligations and your rights under the law.

In brief

- This notice is for the people we deal with at our customer organisations, such as schools, multi-academy trusts and businesses, and for individual customers.
- We use your information to provide our products and services, manage your organisation's
- account, provide support and keep you informed.
- We never sell your personal data. We only send marketing in line with the law, and you can opt out
- at any time.
- You have rights over your personal data. Contact our Data Protection Officer, Tanya Taylor, at tanya.taylor@tlg.co.uk.

1. Information about us

TLG (Transforming Learning Group) is the UK operational partner for schools and multi-academy trusts, bringing together expertise across technology, data, finance and compliance. TLG is made up of several group companies, listed in Appendix A. In this notice, "TLG", "we", "us" and "our" mean the TLG company that you or your organisation has a contract or relationship with, which is the controller of your personal data.

Company name	Transforming Learning Group
Company number	Registered in England under company number 04995157
Registered address	Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN
VAT number	837 1722 24
Data Protection Officer	Tanya Taylor
Email	tanya.taylor@tlg.co.uk
Regulator	Information Commissioner's Office (ICO). Our ICO registration numbers are listed in Appendix A.

2. What does this notice cover?

This Privacy Notice explains how we collect, hold, use and share personal data about our customers, and your rights under the law. It applies to:

- staff and governors at schools, multi-academy trusts and other organisations that buy, use or enquire about our products and services, such as headteachers, school business managers, IT leads, finance staff and trust executives;
- individual customers and sole traders; and
- users of our customer portals, support services and software.

When we act for your school or trust

When we provide services to a school, trust or other organisation, we often process personal data on its behalf, for example pupil, parent and staff information held in systems we host, support or manage. In that case your organisation is the controller, and we are its processor. We only use that data on your organisation's written instructions and under a contract that meets Article 28 of the UK GDPR. Your organisation's own privacy notice explains how that data is used, and any request about it should be made to your organisation. We will pass on any request we receive and help your organisation respond.

This notice should be read with our Website Privacy Policy, which explains how we use information collected through our website, including cookies.

3. What is personal data?

Personal data is defined by the UK General Data Protection Regulation (UK GDPR) as "any information relating to an identified or identifiable living individual". Our use of personal data is governed by the UK GDPR, the Data Protection Act 2018 (DPA 2018), the Data (Use and Access) Act 2025 (DUAA) and the Privacy and Electronic Communications Regulations 2003 (PECR) (together, "the Data Protection Legislation").

In simpler terms, personal data is any information about you that enables you to be identified. It covers obvious information such as your name and contact details, but also less obvious information such as identification numbers, electronic location data and other online identifiers.

4. What are your rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold. Some rights only apply in certain circumstances.

Your right	What it means
To be informed	To be told how we collect and use your personal data. This notice is part of how we do this.
Of access	To ask for a copy of the personal data we hold about you (see section 10).

To rectification	To have inaccurate or incomplete personal data corrected.
To erasure	To ask us to delete your personal data where there is no good reason for us to keep it (sometimes called the "right to be forgotten").
To restrict processing	To ask us to pause using your personal data, for example while we check its accuracy.
To object	To object to us using your personal data based on our legitimate interests. You can object to direct marketing at any time and we will stop.
To withdraw consent	Where we rely on your consent, to withdraw it at any time. This does not affect anything we did before you withdrew it.
To data portability	To receive personal data you gave us in a reusable electronic format, where we use it with your consent or to perform a contract with you, and process it by automated means.
Relating to automated decision-making	Not to be subject to significant decisions made solely by automated means without safeguards, and to ask for human review (see section 6).

To exercise any of these rights, or if you have questions, please contact us using the details in section 12. It is important that the personal data we hold about you is accurate and up to date, so please tell us if your details change. Further information about your rights is available from the ICO at ico.org.uk.

5. What personal data do we collect and how?

We may collect and hold some or all of the personal data set out below, using the methods shown.

Data collected	Examples	How we collect it
Identity information	Name, title	From you, or from your organisation when it places an order or sets up a service; customer portal; website forms; support tickets
Contact information	Work address, email address, telephone numbers	As above
Business information	Organisation name, job title, role, department	As above; publicly available sources such as Get Information About Schools (GIAS) and Companies House

Data collected	Examples	How we collect it
Payment information	Bank account details, billing contact, payment and invoice history. For individual customers, payment details	Order forms, direct debit mandates, customer portal, our finance system
Account and profile information	Portal login details, products and services purchased, preferences, feedback and survey responses	Customer portal, orders, surveys
Support and correspondence	Support tickets, emails, chat messages, call logs and call recordings, meeting notes	Service desk, email, telephone, live chat, video meetings
Technical information	IP address, device and browser details, system and audit logs when you use our portals, software or remote support tools	Automatically when you use our systems
Marketing and communication preferences	Your preferences about receiving marketing, event attendance	Preference centre, sign-up forms, events
Data from third parties	Contact and profile information	Other TLG companies, partners, event organisers, and publicly available education-sector sources

We do not normally need special category data (such as health information) about our customer contacts. If you tell us about an access requirement, for example for training or an event, we will only use it to make suitable arrangements, with your consent.

Where we need personal data to perform a contract with you or your organisation, and it is not provided, we may not be able to provide the products or services requested.

6. How do we use your personal data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The table below describes how we use your personal data and our lawful bases for doing so. Where we rely on legitimate interests, we have checked that they are not overridden by your interests and rights.

What we do	What data we use	Our lawful basis

Setting up and administering your organisation's account	Identity, contact, business, account	Legitimate interests (to perform our contract with your organisation). Contract, for individual customers.
Supplying our products and services, including support, onboarding and training	Identity, contact, business, account, support, technical	Legitimate interests (to perform our contract with your organisation). Contract, for individual customers.
Managing payments, invoices and debt recovery	Identity, contact, payment	Legitimate interests (to perform our contract and recover money owed). Contract. Legal obligation (tax and accounting records).
Communicating with you about your account, services, changes to terms and this notice	Identity, contact, account, correspondence	Legitimate interests. Contract. Legal obligation.
Personalising and tailoring our products and services	Identity, business, account and profile	Legitimate interests (to provide relevant services).
Handling enquiries, feedback and complaints	Identity, contact, correspondence	Legitimate interests. Legal obligation.
Recording calls for quality, training and resolving disputes	Call recordings	Legitimate interests. We tell you when a call is recorded.
Keeping our systems and your data secure, including access logs and fraud prevention	Identity, technical	Legitimate interests (network and information security). Legal obligation.
Sending you information about our products, services, events and insights	Identity, contact, business, marketing preferences	Legitimate interests (direct marketing) for contacts at organisations. Consent where PECR requires it, for example for individual customers who have not bought from us.
Complying with the law and regulators, and establishing or defending legal claims	Any relevant data	Legal obligation. Legitimate interests.

Marketing

With your permission and/or where permitted by law, we may use your personal data to send you information, news and offers about our products and services by email, telephone or post. You will not be sent any unlawful marketing or spam. We will always comply with the Data Protection Legislation and PECR, and you can opt out at any time by clicking "unsubscribe" in any email, or by contacting us. We will always get your express consent before sharing your personal data with third parties for their own marketing. If you opt out, we will keep a minimal record so that we do not contact you again, and you will still receive essential service messages.

Automated decision-making

We do not make decisions about you based solely on automated processing that have legal or similarly significant effects. We use automated tools, such as data synchronisation between our systems, to keep records accurate and up to date, but these do not make decisions about you. We do not carry out profiling, other than grouping contacts by role or interest so that our communications are relevant. If this changes, we will update this notice. You can always ask for any decision to be reviewed by a person.

Change of purpose

We will only use your personal data for the purposes for which it was originally collected, unless we reasonably believe another purpose is compatible with the original one. If you would like us to explain how a new purpose is compatible, please contact us. If we need to use your personal data for an unrelated purpose, we will tell you and explain the lawful basis that allows us to do so. In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent, but only within the limits of the Data Protection Legislation.

7. How long will we keep your personal data?

We will not keep your personal data for longer than is necessary for the purposes it was collected for. Retention periods are set in our Data Retention Policy. Your personal data will be kept for the following periods (or, where there is no fixed period, the following factors will be used to decide how long it is kept):

Type of data	How long we keep it
Identity, contact and business information for customer accounts	6 years from the last action on the account, then reviewed
Payment and financial records (invoices, payments, bank details)	6 years from the end of the financial year they relate to, to meet HMRC and Companies Act requirements
Account and profile information (orders, preferences)	6 years from the last action on the account

General enquiries and correspondence	3 years from the last contact
Support tickets and service records	3 years from the last action
Telephone call recordings	12 months
Complaints	6 years from the last action
Marketing contacts	Until you opt out, or 6 months after your last engagement; we keep a suppression record so that we respect your choice
Contracts	6 years from the end of the contract
Data we hold for your school or trust as a processor	Returned or deleted at the end of the contract, in line with the contract and your organisation's instructions (normally within 7 days, with backups overwritten within 14 days)

We may keep personal data for longer if there is a complaint, or if we reasonably believe there is a prospect of legal action. At the end of the retention period, we securely delete or anonymise your personal data.

8. How and where do we store or transfer your personal data?

We store most of your personal data in the UK, where it is fully protected under the Data Protection Legislation.

Some of our service providers store or access personal data in the European Economic Area (EEA). The UK has approved the EEA as providing adequate protection, so transfers there are permitted without additional safeguards.

Some providers may store or access data in other countries, such as the United States. Where this happens, we make sure your data receives a level of protection that is not materially lower than in the UK, by using at least one of these safeguards:

- countries that the UK Government has approved as providing adequate protection;
- US organisations certified under the UK Extension to the EU–US Data Privacy Framework (the "UK–US data bridge"); or
- the ICO's International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses, with a transfer risk assessment.

Keeping your data secure

We use appropriate technical and organisational measures to protect your personal data, as required by Article 32 of the UK GDPR. These include encryption, access controls based on business need,

multi-factor authentication, secure configuration and patching, monitoring, backups, supplier checks, and regular data protection and security training for our staff. We have procedures to deal with any suspected personal data breach and will notify you and the ICO where we are legally required to do so.

9. Do we share your personal data?

We will not sell your personal data, and we will only share it in the following circumstances:

- Other TLG companies, for service delivery and account management. This includes our subsidiaries and our holding company and its subsidiaries.
- Service providers acting as our processors, such as cloud hosting and IT providers, our customer relationship management, service desk, finance and telephony systems, email and survey platforms, payment and direct debit providers, and courier services. They may only use your data on our instructions and under a contract that protects it.
- Professional advisers, such as lawyers, auditors, accountants, insurers and banks.
- Legal and regulatory disclosures. In limited circumstances, we may be legally required to share personal data, for example if we are involved in legal proceedings, or to comply with legal obligations, a court order or the instructions of a government authority such as HMRC or the ICO.
- Business changes. If we sell, transfer or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner may continue to use your personal data in the same ways described in this notice.

Whenever your personal data is shared, we will take steps to make sure it is handled safely, securely and in line with your rights, our obligations and the third party's obligations under the law. Where data is transferred outside the UK, the safeguards in section 8 will apply.

10. How can you access your personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it. This is known as a subject access request.

You can make a request in writing or verbally, using the details in section 12. To make this as easy as possible, a Subject Access Request Form is available on our website. You do not have to use the form, but it helps us understand what you need and respond quickly.

- No fee usually required. We may charge a reasonable fee, or refuse to respond, if a request is manifestly unfounded or excessive, for example if it is repetitive.
- Confirming your identity. We may ask for information to confirm your identity before we respond, so that your data is not disclosed to anyone else.
- Time limit. We will respond without undue delay and within one calendar month. If your request is complex, or you have made several requests, we may extend this by up to two

further months; we will tell you within the first month if so. If we need to ask you to clarify your request, the time limit is paused until you reply.

- Reasonable and proportionate searches. In line with the DUAA, we will carry out reasonable and proportionate searches for your information.

If your request relates to data we hold on behalf of your school or trust, we will pass it to them, as they are the controller.

11. How to complain

If you have any concerns about how we use your personal data, please contact us first so that we can try to put things right. You can email the DPO or use our Data Protection Complaint Form. In line with the DUAA, we will acknowledge your complaint within 30 days, investigate it and tell you the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office at any time:

Website	ico.org.uk/make-a-complaint
Telephone	0303 123 1113
Address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

12. How do you contact us?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Data Protection Officer	Tanya Taylor
Email	tanya.taylor@tlg.co.uk
Postal address	Data Protection Officer, TLG, Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN

13. Changes to this Privacy Notice

This Privacy Notice was last updated in October 2026.

Appendix A – TLG companies

This notice is issued on behalf of the following TLG companies.

Company	ICO registration	Registered office
turn IT on (TIO)	Z1244119	Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN
Schools ICT (SICTS)	Z1744726	Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN
Vital York	Z1290687	480 Huntington Road, Huntington, York, YO32 9PX
SBM Services (UK) Ltd	ZA324686	12 Park Lane Business Centre, Park Lane, Langham, Colchester, CO4 5WR
Locker Technology Ltd	ZB405559	Unit 434 Birch Park, Thorp Arch Estate, Wetherby, West Yorkshire, LS23 7FG
GDPR Sentry	ZA752169	Unit 434 Birch Park, Thorp Arch Estate, Wetherby, West Yorkshire, LS23 7FG
SalamanderSoft Limited	ZA362914	Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN
EduFin	ZA243265	The Oast, EMT Centre, New Road, West Malling, Kent, ME19 6BJ