



Data protection

Website privacy policy

How TLG collects, uses and protects personal data through its website

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Version history

Version	Date	Author	Summary of changes
1.02	-	Steve Baines (former DPO)	Previous Website Privacy Policy template.
2.0	20 October 2026	Tanya Taylor	Full rewrite: new TLG branding; DPO contact updated; DUAA 2025 changes (complaints, SAR searches, cookies, compatible purposes); PECR cookie and marketing rules; updated international transfer safeguards; and document control.

Contents

1. About this policy	4
2. Who we are and how to contact us	4
3. The personal data we collect	5
4. How we collect your personal data	6
5. How we use your personal data and our lawful bases	7
6. Cookies and similar technologies	9
7. Marketing	10
8. Who we share your personal data with	11
9. International transfers	11
10. How we keep your personal data secure	12
11. How long we keep your personal data	12
12. Your rights	13
13. Automated decision-making and AI	14
14. Children	15
15. Links to other websites	15
16. Complaints	15
17. Changes to this policy	15
18. Glossary	16
 Appendix A – Legislation and related documents	 17



1. About this policy

TLG respects your privacy and is committed to protecting your personal data. This policy explains how we look after personal data when you visit our website at www.tlg.co.uk (and any TLG business website that links to this policy), use our online services on behalf of your school, trust or organisation, sign up to hear from us, attend our events, or otherwise get in touch with us. It also tells you about your privacy rights and how the law protects you.

This policy is written to meet the transparency requirements of Articles 13 and 14 of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018) as amended by the Data (Use and Access) Act 2025 (DUAA), and the Privacy and Electronic Communications Regulations 2003 (PECR).

In brief

- TLG is the controller of the personal data collected through this website.
- We collect only what we need: mostly business contact details and information about how our website is used.
- We never sell your personal data, and we only use non-essential cookies with your permission (or where the law allows, with an easy way to opt out).
- You have rights over your data, including access, correction, deletion and objecting to marketing.
- Contact our DPO at tanya.taylor@tlg.co.uk.

Who this policy applies to

This policy applies to visitors to our website, contacts at our customer and prospective customer organisations (such as school business managers, headteachers, IT leads and trust executives), people who subscribe to our communications or register for our events, webinars and training, and anyone who contacts us through the website.

It does not cover personal data we process when we provide services to schools and trusts as their processor (for example, pupil or staff data held in systems we support). That is covered by the privacy notice of the school or trust concerned. Separate privacy notices also apply to job applicants (see our Data Privacy Notice – Applicants), our customers (see our Data Privacy Notice – Customers) and our staff.

Please read this policy together with any other privacy notice we give you on specific occasions, so that you have the full picture. This policy supplements those notices and does not override them.

2. Who we are and how to contact us

Controller

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 companies. This policy is issued on behalf of the TLG group of companies, so when we say "TLG", "we", "us" or "our" we mean the TLG company responsible for processing your data. Unless we tell you otherwise, TLG is the controller responsible for this website.

Processor

Sometimes we process personal data on behalf of another organisation, such as a school or trust that is our customer. In that case the school or trust is the controller and decides how the data is used. We will pass any request about that data to them and support them in responding, as required by our contract with them under Article 28 of the UK GDPR.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) who oversees questions about this policy and how we handle personal data. If you have any questions, or want to exercise any of your rights, please contact the DPO.

Organisation	TLG
Registered address	Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN
Company number	15027426
Data Protection Officer	Tanya Taylor
DPO email	tanya.taylor@tlg.co.uk
Website	www.tlg.co.uk

3. The personal data we collect

Personal data means any information about an identified or identifiable living person. It does not include data where the identity has been removed (anonymous data). Depending on how you interact with us, we may collect, use, store and transfer the following categories of personal data:

Category	What it includes
Identity Data	First name, last name, title, job title, the organisation you work for, username or similar identifier.
Contact Data	Work email address, telephone numbers, billing and delivery addresses.
Correspondence Data	Messages you send us through web forms, live chat, email or telephone, and our replies. Calls may be recorded (see section 5).
Account and Profile Data	Login details for any customer portal or online account, orders made by your organisation, your interests, preferences, feedback and survey responses.
Event Data	Registration and attendance details for events, webinars and training, and any information you choose to give us about access or dietary requirements.
Transaction Data	Details of payments to and from your organisation and the products and services purchased. We do not store full payment card details; card payments are handled by our payment provider.
Technical Data	IP address, browser type and version, time zone setting and approximate location, operating system and platform, device identifiers and similar information about the device you use to access our website.
Usage Data	Information about how you use our website, products and services, such as pages visited, links clicked and time spent on pages.

Category	What it includes
Marketing and Communications Data	Your preferences about receiving marketing from us, and your communication preferences.

Aggregated data

We also create and use aggregated data, such as statistics about how many visitors use a particular page. Aggregated data may be derived from personal data but is not personal data in law, as it does not directly or indirectly reveal your identity. If we combine aggregated data with personal data so that it can identify you, we treat the combined data as personal data in line with this policy.

Special category and criminal offence data

We do not intentionally collect special category data (information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation) or criminal offence data through this website. The only exception is where you choose to tell us about a health-related access or dietary need when you register for an event. We use this only to make suitable arrangements, with your explicit consent, and delete it after the event.

Please do not include special category data, or any information about pupils, in website forms or chat messages.

If you do not provide personal data

Where we need personal data to meet a legal obligation, or under the terms of a contract with you or your organisation, and you do not provide it, we may not be able to provide the products or services requested. We will tell you if this is the case at the time. Fields that are optional on our forms are clearly marked.

4. How we collect your personal data

We collect personal data in the following ways:

- Direct interactions. You give us Identity, Contact, Correspondence, Profile and Event Data when
- you fill in forms on our website, request a quote, demonstration or call-back, create an account, subscribe to our newsletters, register for an event or webinar, complete a survey, use live chat, or contact us by phone or email.

- Automated technologies. When you use our website, we automatically collect Technical and
- Usage Data using cookies, server logs and similar technologies. See section 6 for details.
- Your organisation. Your colleagues may give us your details as a contact for your school, trust or organisation, for example when placing an order or setting up a service.
- Third parties and public sources. We may receive personal data from analytics providers, event and webinar partners, education-sector directories and publicly available sources such as Get Information About Schools (GIAS), Companies House and professional networking sites, where this is lawful.

5. How we use your personal data and our lawful bases

We will only use your personal data when we have a lawful basis to do so under Article 6 of the UK GDPR. The table below describes the ways we use personal data, the types of data involved and the lawful basis we rely on. Where we rely on legitimate interests, we have carried out a legitimate interests assessment to make sure our interests are not overridden by your interests, rights and freedoms. You can ask the DPO for more information about this.

Purpose	Types of data	Lawful basis
To respond to enquiries, quote and demonstration requests, and live chat messages	Identity, Contact, Correspondence	Legitimate interests (to respond to enquiries and develop our business). Steps prior to entering a contract, where you are contracting personally.
To register your organisation as a customer and set up website or portal accounts	Identity, Contact, Account and Profile	Legitimate interests (to perform our contract with your organisation). Contract, where you are contracting personally.

Purpose	Types of data	Lawful basis
To process and deliver orders, manage payments, fees and charges, and recover money owed	Identity, Contact, Correspondence, Transaction	Legitimate interests (to perform our contract and recover debts). Legal obligation (tax and accounting records).
To manage our relationship with you, including telling you about changes to our terms or this policy and handling requests and complaints	Identity, Contact, Account and Profile, Correspondence	Legal obligation. Legitimate interests (to keep our records up to date and manage our customer relationships).
To register you for and run events, webinars and training	Identity, Contact, Event, Correspondence	Legitimate interests (to deliver events you have asked to attend). Explicit consent for any health-related access or dietary information.
To run surveys, prize draws or competitions and gather feedback	Identity, Contact, Account and Profile, Usage	Legitimate interests (to understand how customers use our services and to improve them).
To administer and protect our business and website, including security monitoring, troubleshooting, testing, fraud prevention and hosting	Identity, Contact, Technical, Usage	Legitimate interests (network and information security, preventing fraud and running our business). Legal obligation.

Purpose	Types of data	Lawful basis
To use analytics to understand how our website is used and improve it	Technical, Usage	Consent, given through our cookie banner. Where PECR (as amended by the DUAA) allows statistical cookies without consent, legitimate interests, with a clear way for you to opt out.
To send you marketing about our products, services, events and insights	Identity, Contact, Account and Profile, Usage, Marketing and Communications	Legitimate interests (direct marketing) for business contacts at schools, trusts and other organisations. Consent where PECR requires it, for example for sole traders and individual subscribers.
To show you relevant content and advertising and measure how effective it is	Technical, Usage, Marketing and Communications	Consent (through our cookie banner).
To record telephone calls for quality, training and dispute resolution	Correspondence (call recordings)	Legitimate interests (to monitor service quality, train our staff, keep records and prevent fraud). We tell you at the start of a recorded call.
To comply with the law, respond to regulators and establish, exercise or defend legal claims	Any relevant data	Legal obligation. Legitimate interests.
In the context of a business reorganisation, sale or group restructuring	Any relevant data	Legitimate interests (to run and develop our business).

Consent

Where we rely on consent, you can withdraw it at any time by using the cookie settings link in our website footer, clicking "unsubscribe" in any email, or contacting the DPO.

Withdrawing consent does not affect processing carried out before you withdrew it.

Change of purpose

We will only use your personal data for the purposes we collected it for, unless we reasonably consider that we need to use it for another purpose that is compatible with the original one. Under the DUAA, certain further purposes are treated as compatible, for example where processing is needed to protect public security or to meet a legal obligation. 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.

6. Cookies and similar technologies

Cookies are small text files placed on your device when you visit a website. We and our partners use cookies, pixels and similar technologies on our website. Under PECR, we must ask for your consent before setting cookies that are not strictly necessary, unless an exemption applies. When you first visit our website, our cookie banner lets you accept or reject non-essential cookies or choose by category. You can change your choices at any time using the Cookie settings link in the website footer.

Category	What they do	Do we need your consent?
Strictly necessary	Make the website work, keep it secure (for example, load balancing and protection against malicious traffic) and remember your cookie choices.	No. These cannot be switched off.
Functional	Remember preferences such as region or form entries, and support features like live chat.	Yes, unless the feature is one you have specifically requested.
Analytics	Help us understand how visitors use the website so we can improve it. Data is	Yes. Where the law allows statistical cookies without consent, we will tell you

Category	What they do	Do we need your consent?
	aggregated where possible and IP addresses are truncated.	and give you an easy way to opt out.
Marketing	Measure our campaigns and show you relevant TLG content on other websites and social media.	Yes. These are off unless you switch them on.

A full list of the cookies we use, who sets them and how long they last is available in our Cookie Policy at [\[insert link to cookie policy\]](#). You can also set your browser to refuse or delete cookies, but some parts of the website may then not work properly.

7. Marketing

We want to give you choices about how we use your personal data for marketing.

- Business contacts. If you work for a school, trust or other organisation, we may send you emails about TLG products, services, events and insights that are relevant to your role, based on our legitimate interests. Every email includes a simple way to unsubscribe.
- Individuals and sole traders. We will only send you electronic marketing if you have given consent, or if you have bought or asked about similar products or services from us and did not opt out when we collected your details (the "soft opt-in").
- Third-party marketing. We never sell your personal data. We will get your express consent before sharing your personal data with any company outside TLG for its own marketing.

You can ask us to stop sending you marketing at any time by clicking the unsubscribe link in any marketing email, updating your preferences in your account, or contacting the DPO. You have an absolute right to object to direct marketing. If you opt out, we will keep a minimal record of your email address on a suppression list so that we do not contact you again. You will still receive service messages that are needed to manage your organisation's account or contract.

8. Who we share your personal data with

We may share your personal data with the parties below for the purposes set out in section 5:

- Other TLG companies, which provide IT, data, finance, software and compliance services, where this is needed to respond to you or deliver services to your organisation.
- Service providers acting as our processors, including website hosting and content management, customer relationship management (CRM) and marketing automation, email delivery, analytics, live chat, event and webinar platforms, telephony, cloud IT and productivity services, and payment processing.
- Professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors and insurers.
- HM Revenue & Customs, the Information Commissioner's Office, other regulators, law enforcement and courts, where we are legally required to disclose information or where it is needed to protect our rights.
- Third parties to whom we may sell, transfer or merge parts of our business or assets. If our business changes hands, the new owners may use your personal data in the same way as set out in this policy.

We require all third parties to respect the security of your personal data and to treat it in line with the law. Our processors may only use your personal data on our documented instructions and under a written contract that meets Article 28 of the UK GDPR, including confidentiality, security and breach- notification obligations. We carry out due diligence on suppliers before we use them and review them regularly, in line with our supplier security controls.

9. International transfers

We aim to store and process personal data in the UK. Some of our service providers are based outside the UK, or use sub-processors outside the UK, which means your personal data may be transferred to other countries such as those in the European Economic Area (EEA) or the United States.

Whenever we transfer personal data outside the UK, we make sure it receives a level of protection that is not materially lower than in the UK, by using at least one of these safeguards:

- transfers to countries that the UK Government has approved under UK data protection regulations as providing an adequate level of protection (including the EEA);
- transfers to US organisations certified under the UK Extension to the EU–US Data Privacy Framework (the “UK–US data bridge”);
- the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses issued by the ICO, supported by a transfer risk assessment and additional technical measures such as encryption where needed.

Please contact the DPO if you would like more information about the safeguards used for a particular transfer.

10. How we keep your personal data secure

Information security is central to how we work. TLG applies appropriate technical and organisational measures to protect personal data against accidental or unlawful loss, access, use, alteration or disclosure, as required by Article 32 of the UK GDPR. These include:

- encryption of data in transit (our website uses HTTPS/TLS) and, where appropriate, at rest;
- access controls based on least privilege and business need, with multi-factor authentication for systems holding personal data (see our Access Control Policy and Password Policy);
- secure configuration, regular patching, vulnerability scanning and independent testing of our website and systems;
- logging and monitoring to detect and respond to suspicious activity;
- security and data protection due diligence on our suppliers, with contractual security requirements;
- backups and business continuity arrangements so that data stays available and can be restored;
- confidentiality obligations and regular data protection and security training for all staff and contractors; and
- privacy by design and default, including data protection impact assessments (DPIAs) for new or high-risk processing.

We have procedures to deal with any suspected personal data breach (see our Data Breach Policy). Where required, we will notify the ICO within 72 hours of becoming aware

of a breach, and tell you without undue delay if a breach is likely to result in a high risk to your rights and freedoms.

No transmission over the internet is completely secure. Please help us by keeping any account passwords confidential and contacting us straight away if you think your account has been compromised.

11. How long we keep your personal data

We keep personal data only for as long as necessary to fulfil the purposes we collected it for, including any legal, regulatory, tax, accounting or reporting requirements. We may keep it for longer if there is a complaint or if we reasonably believe there is a prospect of legal action. Retention periods are set in our Data Retention Policy, which considers the amount, nature and sensitivity of the data, the risk of harm from unauthorised use, the purposes of processing and our legal obligations. Typical periods are:

Type of record	How long we keep it
Website enquiries and general correspondence	3 years from our last contact with you
Customer account details	6 years from the last action on the account
Financial and transaction records	6 years from the end of the financial year they relate to (Companies Act 2006 and HMRC requirements)
Newsletter and marketing contacts	Until you unsubscribe, or 6 months after your last engagement with our communications; suppression list entries are kept so we can respect your choice
Marketing campaign records	6 years from the last action, then reviewed
Complaints	6 years from the last action
Telephone call recordings	12 months
Website security and system audit logs	12 months
Website analytics data	In line with our Data Retention Policy and the cookie lifetimes set out in our Cookie Policy
Event registration data	3 years from the event; health-related access or dietary information is deleted after the event

At the end of the retention period, we securely delete or destroy personal data or anonymise it so that it can no longer be linked to you. We may use anonymised information for statistical purposes without further notice to you.

12. Your rights

Under data protection law you have the following rights in relation to your personal data. 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 policy is part of how we meet this right.
Of access	To ask for a copy of the personal data we hold about you and information about how we use it (a "subject access request").
To rectification	To ask us to correct inaccurate data or complete incomplete data.
To erasure	To ask us to delete your personal data where there is no good reason for us to keep it. We may not always be able to agree, for example if we must keep it by law, but we will explain why.
To restrict processing	To ask us to pause using your data, for example while we check its accuracy or consider an objection.
To data portability	To receive personal data you gave us in a structured, commonly used, machine-readable format, or have it sent to another organisation, where we process it by automated means based on consent or contract.
To object	To object to processing based on our legitimate interests. You can object to direct marketing at any time and we will stop.
Related to automated decision-making	Not to be subject to a significant decision based solely on automated processing without safeguards, and to ask for human review (see section 13).
To withdraw consent	Where we rely on consent, to withdraw it at any time.

How to exercise your rights

To exercise any of these rights, please email the DPO at tanya.taylor@tlg.co.uk or write to us at the address in section 2. You can also use our Subject Access Request form [\[insert link\]](#). More detail is set out in our Subject Access Request Policy.

- No fee usually required. You will not normally have to pay a fee. We may charge a reasonable fee, or refuse to act, if a request is manifestly unfounded or excessive.
- Confirming your identity. We may need to ask for information to confirm your identity before we respond. This is a security measure so that personal data is not disclosed to someone who has no right to receive it.
- Time limit. We will respond without undue delay and within one month. If your request is complex or you have made several requests, we may extend this by up to two further months and will tell you why. Where we need to confirm your identity or ask you to clarify your request, the time limit is paused until we receive the information we need.
- Reasonable and proportionate searches. In line with the DUAA, we will carry out reasonable and proportionate searches for the information you have asked for.

13. Automated decision-making and AI

We do not make decisions about you based solely on automated processing (including profiling) that produce legal effects or similarly significant effects. We use limited profiling for marketing, such as grouping contacts by role or interest so that we send relevant content. You can object to this at any time.

14. Children

Our website is designed for education professionals and organisations and is not aimed at children. We do not knowingly collect personal data from children through this website. If you believe a child has given us personal data through the website, please contact the DPO and we will delete it.

Where we process pupil data on behalf of a school or trust, the school or trust is the controller, and its privacy notice explains how that data is used.

15. Links to other websites

Our website may include links to third-party websites, plug-ins, social media platforms and applications. Clicking those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. We encourage you to read the privacy policy of every website you visit.

16. Complaints

If you are unhappy with how we have handled your personal data, please contact us first so we can try to put things right. You can email the DPO at tanya.taylor@tlg.co.uk or use our Data Protection Complaint Form [\[insert link\]](#). Our Data Protection Complaint Procedure explains how we deal with complaints.

In line with the DUAA, we will acknowledge your complaint within 30 days, take appropriate steps to investigate it, keep you informed of progress, and tell you the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection, 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

17. Changes to this policy

We review this policy at least once a year, and sooner if there is a change in the law, ICO guidance, our processing activities or our website. The version number and date at the front of this policy show when it was last updated. If we make significant changes, we will highlight them on our website and, where appropriate, tell you directly.

It is important that the personal data we hold about you is accurate and up to date. Please let us know if your details change during your relationship with us.

18. Glossary

Term	Meaning
Controller	The organisation that decides why and how personal data is processed.
Processor	An organisation that processes personal data on behalf of, and on the instructions of, a controller.
Legitimate interests	Our interest in running and managing our business so we can give you the best service and the most secure experience. We balance any impact on you and your rights before relying on it, and do not use your data where our interests are overridden by the impact on you.
Performance of a contract	Processing your data where it is necessary for a contract you are party to, or to take steps at your request before entering into a contract.
Legal obligation	Processing your personal data where it is necessary to comply with a legal or regulatory obligation that we are subject to.
Consent	A freely given, specific, informed and unambiguous indication of your wishes, given by a clear affirmative action.
Special category data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and genetic, biometric, health, sex life or sexual orientation data.
DUAA	The Data (Use and Access) Act 2025, which amends the UK GDPR, DPA 2018 and PECR.
PECR	The Privacy and Electronic Communications Regulations 2003, which cover cookies and electronic marketing.

Appendix A – Legislation and related documents

Legislation and guidance

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA 2018)
- Data (Use and Access) Act 2025 (DUAA)
- Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), as amended
- ICO guidance on the right to be informed, cookies and similar technologies, and direct marketing

Related TLG documents

- Data Protection Policy
- Data Protection Complaint Procedure and Form
- Information Security Policy
- Access Control Policy
- Information Management Policy
- Password Policy
- Data Breach Policy
- Data Privacy Notices – Customers, Applicants, Staff
- Data Retention Policy
- Subject Access Request (SAR) Policy
- Cookie Policy