

Privacy Policy - Bromcom

- **Introduction**
- **Bromcom as a processor**
- **Personal data we collect about you**
- **How your personal data is collected**
- **How and why we use your personal data.**
- **Telephone recording**
- **Marketing**
- **Who we share your personal data with**
- **Where your personal data is held**
- **Cookies**
- **Your rights**
- **Keeping your personal data secure**
- **How to complain**
- **Changes to this privacy policy**
- **How to contact us**

Introduction

Bromcom Computers plc ("**Bromcom**", "**we**", "**us**" and "**our**") takes your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Bromcom is a company that:

- Keeps a record about Bromcom staff, suppliers, customers and potential customers,
- Supplies Management Information System software and services to schools and organisations that oversee schools such as local authorities (LAs) and Multi Academy Trusts (MATs).
- Supplies education based information to parents and guardians of pupils via the MyChildAtSchool website. Also provides an online payment facility via the MCAS website.

This privacy policy applies to Bromcom as a data controller; we are a data controller where we determine what personal data to collect and why. Bromcom is a data controller when it collects personal data about its staff, suppliers, customers and potential customers.

Bromcom as a processor

Bromcom is a processor where we process the personal data of users on behalf of a school, LA or MAT that is registered with us. We provide the Management Information System software to the school, and we are a processor for any information uploaded by users of this software. In these

circumstances the relevant school, LA or MAT is the data controller. Please look at the privacy policy of the relevant school, LA or MAT to find out how we process personal data for these purposes.

Personal data we collect about you

We may collect and use the following personal data about you and your organisation:

- name and contact information, including email address and telephone numbers and company details
- your job title
- information to check and verify you/your organisation's identity location data
- Information about how you use our website (cookies, location and traffic data, IP address and organisation etc), IT, communication and other systems, your responses to surveys, competitions and promotions
- recordings of phone calls to the following teams: onboarding/deployment, migration, training, helpdesk and customer care
- recording of webinars, presentations and other video calls

We collect and use this personal data to provide services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How your personal data is collected

We collect most of this personal data directly from you—in person for example at marketing events, by telephone, text or email and/or via our website and apps.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason. Under the UK GDPR, the lawful bases we rely on for processing your information are:

- where you have given us clear consent for us to process your personal information for a specific purpose;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The items below explain in more detail how we use your personal data and why:

Providing services to you – To perform our contract with you or to take steps at your request before entering into a contract.

Preventing and detecting fraud against you or us – For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us.

Ensuring business policies are adhered to, e.g. policies covering security and internet use – For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you.

Operational reasons, such as improving efficiency, training, monitoring and quality control – Phone recordings: For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price Telephone/webinar/demo video recordings: Consent.

Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures – For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price.

Preventing unauthorised access and modifications to systems – For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us to comply with our legal and regulatory obligations.

Updating and enhancing customer records – To perform our contract with you or to take steps at your request before entering into a contract to comply with our legal and regulatory obligations for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products.

Statutory returns – To comply with our legal and regulatory obligations.

Ensuring safe working practices, staff administration and assessments – To comply with our legal and regulatory obligations for our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.

Marketing our services to: existing and former customers; third parties who have previously expressed an interest in our services; third parties with whom we have had no previous dealings – For our legitimate interests, i.e. to promote our business to existing and former customers.

External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts – For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with our legal and regulatory obligations.

Telephone recording

We may record telephone calls you make to us to:

- check for mistakes
- train staff and for quality assurance purposes
- prevent, detect and investigate fraud
- help plan and make improvements to our services
- provide helpdesk support

We do this in the interest of offering a good service to our customers and improving our services, which is in our legitimate interests.

Sometimes, calls may not be recorded if:

- there's a technical fault with the telephone system
- a call handler is using equipment which does not let calls be recorded
- you've been transferred to a line which does not record calls.

Recordings of webinars/presentations/demos videos on Microsoft Teams

We may record the above to:

- check for mistakes
- train staff and for quality assurance purposes
- prevent, detect and investigate fraud
- help plan and make improvements to our services

We do this in the interest of offering a good service to our customers and improving our services. We will ask your permission to record.

Sometimes, recordings may not take place if there's a technical fault with the system.

The retention period is 6 months after the Microsoft Teams recording was made. For more information on how Microsoft MS Teams store the recording, see here: **Use OneDrive for Business and SharePoint for meeting recordings – Microsoft Teams | Microsoft Docs**

Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at **legal@bromcom.com** for marketing opt-out;
- using the 'unsubscribe' link in emails or 'STOP' number in texts
- We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business

We will always treat your personal data with the utmost respect and never share it with other organisations for marketing purposes.

Who we share your personal data with

We may need to:

- share personal data with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts;
- share personal data with any service providers we use such as our helpdesk suppliers;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see **'How to contact us'** below).

We will not share your personal data with any other third party.

Where your personal data is held

Personal data may be held at our offices and those of our service providers and representatives as described above (see above: **'Who we share your personal data with'**).

How long your personal data will be kept

We will keep your personal data while you have an account with us, or we are providing services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data e.g call recordings which are kept for 3 years in the case of a calls made to the support/help desk team or 12 months for any other type of call.

Cookies

In order to help us operate our website, and understand how it is being used, we use cookies and similar technologies. Cookies also help us target advertising effectively. Some cookies are essential for our website to work properly. We use non-essential cookies from Google Analytics in order to understand how people navigate to and use our website. You can disable and delete cookies through your web browser settings and/or on the website, although this may impact website functionality. For more detailed information on how we use cookies, please see our cookie policies.

Your rights

You have the following rights, which you can exercise free of charge:

Access – The right to be provided with a copy of your personal data.

Rectification – The right to require us to correct any mistakes in your personal data.

Erasure (also known as the right to be forgotten) – The right to require us to delete your personal data—in certain situations.

Restriction of processing – The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data.

Data portability – The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.

To object – The right to object: at any time to your personal data being processed for direct marketing (including profiling); in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision making – The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the **Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights**.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**';
- provide enough information to identify yourself (eg your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you; and
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us if you have any query or concern about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have. You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: **0303 123 1113**.

Changes to this privacy policy

This privacy notice was last updated on 30 / 09 /2025

We may change this privacy notice from time to time—when we do, we will inform you via *our website or other means of contact such as email*.

How to contact us

You can contact us and/or our Data Protection Officer by email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

44 Rutland House, Masons Hill, Bromley, BR2 9JG

020 8290 7171

DPO email: privacy@dataguard.co.uk