**DATA PRIVACY IMPACT ASSESSMENT (DPIA)**

This Data Privacy Impact Assessment (DPIA) should be completed by the business function with primary responsibility for the product, service, or system specified in Section I below and returned to the Company’s Business Unit Privacy Leader (BUPL) for review.

**Definitions:**

* Personal Information: Information that relates to an identified or identifiable individual (e.g., name, contact details). Personal Information can also include data collected through cookies stored on computers, IP addresses, device ID’s, an individual’s preferences, purchase or transaction history, and someone’s opinions about another person. Personal Information may be in paper or electronic form, and also includes images, video (such as CCTV) and video recordings, and pertain to information about an individual in a business or work context (e.g., [John.Smith@harpercollins.co.uk](mailto:John.Smith@harpercollins.co.uk)) Sensitive Personal Information, defined below, is a category of Personal Information.
* Sensitive Personal Information: Types of Personal Information that are considered to present a greater risk of privacy harm than others due to their level of sensitivity. Special Personal Information includes sensitive information such as: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; information regarding sexual orientation; and details relating to criminal offenses or convictions. It also includes information such as: Social Security numbers; driver’s license information; passport information; financial/banking information; payment card information; username and password; credit history; and health information.

1. **INFORMATION ABOUT THE SYSTEM / PRODUCT / SERVICE**

|  |  |
| --- | --- |
| Identify the product, service, or system covered by this DPIA | This impact assessment covers the digital learning platforms of:  Collins ADAPT  Collins Hub  Collins Openpage  Collins Vocab Express  Collins Connect |
| What is the purpose of this product, service, or system? | All platforms are used to enable digital online learning of individuals or pupils and to support schools to enable learning for their students. |
| Identify each Company legal entity that will collect or use Personal Information through this product, service, or system, along with the country/countries in which it operates: | All data will be used for the purposes of legitimate business interest only by:  HarperCollins Publishers, Westerhill Road, Bishopbriggs, Glasgow G64 2QT, regstered in UK registered SC027389.  DPO :  Arthur Heard, [Arthur.Heard@harpercollins.co.uk](mailto:Arthur.Heard@harpercollins.co.uk)  HarperCollins ICO Registration Number: Z4895037  We are supported by the following vendors / partners:  Collins Adapt & Collins Hub (Platform used under license agreement from) - Area9 Lyceum ApS (registered in Denmark under number 39079976) whose registered office is at Galionsvej 37, 1437 Copenhagen K, Denmark ("Area9").  Collins Connect & Collins Openpage (Platforms used under license agreement from) – Excelsoft Technologies Pvt, 1B Hotagalli Industrial Area, Mysore 570018, Karnataka, India.  VocabExpress – (Platform owned by HarperCollins Publishers) - No sub-processors are used.  Amazon Web Services (Europe):  AWS used for Collins Openpage & Connect - based in Dublin Ireland  AWS used for Collins ADAPT & Collins Hub – based in Germany EU.  Microsoft Azure (Europe) for Vocab Express – London UK. |
| Person responsible for completing this assessment:  Name:  Position & Department/Division:  Email:  Phone: | David Murray  Operations Director  Collins  HarperCollins Publishers  [david.murray@harpercollins.co.uk](mailto:david.murray@harpercollins.co.uk)  0141 306 3323 |

1. **WHO AND WHERE ARE THE INDIVIDUALS**

Whose Personal Information will be collected and/or used, and where are these individuals located? (Check all that apply)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | To be collected? (x) – Highlight fields applicable only | Country | Will we notify the individual of the processing before collection? | Will we give individuals options in relation to the processing of their data or the ability to opt out? |
| Employees/Consultants  Freelancers/Volunteers  Interns |  |  |  |  |
| Applicants |  |  |  |  |
| Customers/Subscribers  Members/Users | x  x - Users | UK, EU | Yes | Yes |
| Vendors/Suppliers |  |  |  |  |
| Service providers |  |  |  |  |
| Business partners  Survey respondents |  |  |  |  |
| Other (please specify) |  |  |  |  |

1. **WHAT CATEGORIES OF PERSONAL INFORMATION WILL BE COLLECTED OR USED?**

**Sensitive Personal Information Chart:** Please check the appropriate boxes below to indicate what type of information is collected or used for each category of individual. If a third party collects the information, please provide details in the Comments section below.

|  | Employees | Applicants | Customers | Vendor/ Suppliers | Service Providers | Business Partners | Survey Respondents | Other (specify) |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Racial or ethnic data |  |  |  |  |  |  |  |  |
| Political opinions or beliefs |  |  |  |  |  |  |  |  |
| Religious / philosophical beliefs |  |  |  |  |  |  |  |  |
| Health information (physical or mental, including disabilities) |  |  |  |  |  |  |  |  |
| Sexual orientation |  |  |  |  |  |  |  |  |
| Sex life |  |  |  |  |  |  |  |  |
| Criminal records or criminal / unlawful behavior |  |  |  |  |  |  |  |  |
| Biometric data |  |  |  |  |  |  |  |  |
| Genetic information |  |  |  |  |  |  |  |  |
| Union membership |  |  |  |  |  |  |  |  |
| Social security number |  |  |  |  |  |  |  |  |
| Driver’s license number |  |  |  |  |  |  |  |  |
| Passport number |  |  |  |  |  |  |  |  |
| Other government ID (please list which ones) |  |  |  |  |  |  |  |  |
| Date of birth |  |  |  |  |  |  |  |  |
| Debit or credit card number |  |  |  |  |  |  |  |  |
| Bank account information |  |  |  |  |  |  |  |  |
| Employee disciplinary records |  |  |  |  |  |  |  |  |
| Employee performance rating / evaluation |  |  |  |  |  |  |  |  |
| Other (please specify) |  |  |  |  |  |  |  |  |

Comments:

We do not collect any special or sensitive data categories in our platforms.

**Children**

|  |  |
| --- | --- |
| Does the product, service, or system collect Personal Information about children under the age of 13 | Yes. The platforms collect name and email address information in order to create individual login and user experiences.  However, any data is held securely within the platform and access is enabled via strict permission based access to view this.  The relevant access controls comply with OWASP best practices, and our platforms have also passed NewsCorp’s Information Security reviews including vulnerability scans and Penetration tests to ensure compliance & security of all data. |

**Other Personal Information:** Please check the appropriate boxes below with (x) to indicate what type of information is collected or used for each category of individual. If a third party collects the information, please provide details in the Comments section below.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Employees | Applicants | Customers | Vendors/ Suppliers | Service Providers | Business Partners | Survey Respondents | Other (specify) |
| Contact information (including name, address, email, phone) |  |  | x |  |  |  |  |  |
| IP address |  |  |  |  |  |  |  |  |
| Activity records |  |  | x |  |  |  |  |  |
| Employee ID |  |  |  |  |  |  |  |  |
| Job information |  |  |  |  |  |  |  |  |
| Other (please specify) |  |  | School Name |  |  |  |  |  |

1. **HOW WILL THE PERSONAL INFORMATION BE COLLECTED AND USED?**

|  |  |
| --- | --- |
| How will the Personal Information be collected? (List all that apply)   * + - 1. Submitted by individual, such as by completing a form     - 2. Through website, mobile app, or other online service (please identify)     - 3. From enterprise customers     - 4. From third-party service providers     - 5. From third-party business partners     - 6. From data brokers or other commercial data sources     - 7. Other (please identify) | Items 1 & 2 APPLY.    The data will be collected and retained securely within the platforms upon registration of the individuals.  This will be done either as:   1. Individual set up and registration by themselves or by a parent directly within the platform. 2. School administrator – Where schools have subscribed to the platforms and an authorized administrator acting on behalf of the school would sets up class registration. 3. Collins Digital Support Team – Where school administrators authorize HarperCollins to set up & register schools or classes within the platforms. |
| For what purposes will the Personal Information be used? (Check all that apply)   * + - 1. Developing products or services     - 2. Customer service     - 3. Data analytics for commercial purposes     - 4. Customer registration     - 5. Loyalty programs     - 6. Marketing     - 7. Employee relations     - 8. Other (please identify) | Items 2, 4 & 8 APPLY.  For 8. The activity progress is captured within the platform on Collins ADAPT to provide an adaptive learning journey unique to each student. |
| Will the Personal Information be used to make automated decisions about people, such as screening employment applications or deciding who will receive commercial offers? | No |

1. **WILL THE PERSONAL INFORMATION BE ACCESSIBLE FROM OTHER COUNTRIES AND/OR BY THIRD PARTIES?**

|  |  |
| --- | --- |
| Will the Personal Information be accessible by anyone from other countries? (if yes, provide details) | We are supported by partners in Denmark and India who assist with essential development or maintenance work of the core platform. |
| Will the Personal Information be stored or maintained on third-party systems, such as third-party cloud storage services or other service provider systems? (If yes, please identify the third-party systems) | Yes.  The hosting of the platforms is set up as follows:  Collins Connect and Openpage – AWS, Dublin Ireland, EU  Collins ADAPT & Collins Hub – AWS, Germany EU  VocabExpress – Microsoft Azure, London UK |
| Will the Personal Information be accessible to service providers or other business partners? (if yes, please identify them and provide copies of any applicable contracts under which the data would be shared) | Yes.  Excelsoft Technologies PVT, registered and based in India, is the developer of the digital platforms Connect and Openpage. They are responsible for the overall build, ongoing development work and they host the platform as part of our agreements. All schools data is hosted in EU via Amazon web services.  Area9 Lyceum ApS, registered and based in Denmark, is the developer of the digital platform ADAPT & Collins Hub. They are responsible for the overall build, ongoing development work and they host the platform as part of our agreements. All data is hosted in EU via Amazon web services.  Data sharing agreements, including necessary documentation for relevant transfers to cover platform development and maintenance access, are in place for these partners. |
| Does the Company have agreements with these third parties regarding the privacy and security of the Personal Information? | Yes. |

1. **WILL THE COMPANY PROVIDE ACCESS AND CORRECTION RIGHTS? HOW WILL THE COMPANY KEEP THE PERSONAL INFORMATION ACCURATE?**

|  |  |
| --- | --- |
| Is there a process to allow individuals (including all categories of individuals identified in Section II) to request access, correction and/or removal of Personal Information about them? | Yes. |
| Is there a system in place to keep the Personal Information accurate, complete and up-to-date? | Yes. |
| How long will this Personal Information be retained? | Personal information is held for the duration of a valid subscription and is deleted 90 days thereafter to allow for lapses in subscription renewals. |
| Is there an established process for securely disposing of the Personal Information? | Yes. There is a standardized procedure which is used. |

1. **HOW WILL THE COMPANY SECURE THE PERSONAL INFORMATION?**

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| --- | --- |
| Has an Information Security Assessment been performed? | All of our platforms have been subjected to an internal Infosec review and approval by our parent company News Corporation.  Any remedial action from those reviews has been applied to the platforms to ensure we are compliant. Reviews and penetration testing take place regularly. |