

Project Q & AQA Privacy Notice

Last Updated: April 2023

1 Introduction

The Project Q platform has recently been acquired by AQA Education Group of companies. AQA Education are the leading awarding organisation of GCSE and A Levels across England.

This means that assets, including personal data, are now owned and controlled by AQA Education as the recipient organisation. This Updated Privacy Information document has been compiled in relation to your personal data that is being handled both by Project Q and the new data processor, AQA Education Group, as part of the acquisition of Project Q. There may be some rationalisation of customer data into one central location and combined service offerings in the future.

2 Parties involved in processing your data

The legal entities that control and process your personal information are:

Data Processor:

- **AQA Education** (registered office: Devas Street, Manchester, M15 6EX). This also includes the wider group of AQA Education owned companies. See [AQA's Privacy Notice](#).

Sub-Processor for support services (as before)

- **School Synergy Ltd** (registered office: 7 Station Road, Hesketh Bank, Preston, Lancashire, United Kingdom, PR4 6SN).

3 The data we collect and what we do with it

The personal information you provide to AQA and Project Q is important. Utilising your personal data means that we can offer you services that best meet your needs, including new and innovative services.

Data you provide will be held securely and in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). Your personal details will not be disclosed to third parties outside of AQA Group. Project Q nor AQA are not responsible for deciding how information you enter into Project Q is processed; data is processed on behalf of your organisation. Each school/college remains the Data Controller. Use of Project Q will be on the understanding that your organisation is registered with the Information Commissioner's Office and are adhering to the Data Protection Legislation as it applies to you.

We may use your personal data for other purposes as long as they are compatible with the purposes in which they were collected. If there is an expectation that your personal data may be used for another unrelated purpose, we shall inform you prior to that further processing.

Where there is a requirement to transfer personal data outside of the UK/EEA to a third country, not deemed adequate by the UK GDPR, then additional safeguards are in place to facilitate this to occur.

The personal data in relation to this engagement will be processed for periods in line with current retention policies and where we have a lawful basis to do so. There is no automated decision making or profiling conducted on any personal data.

If you require any further information on your rights, or this new arrangement, please feel free to review AQA's Privacy Notice at <https://www.aqa.org.uk/about-us/privacy-notice>, and Project Q's Privacy Notice at <https://www.projectq.co/policies>. There is also a 'Contact us' section at the bottom of this document.

4 Cookies

During normal use of the www.projectq.co website, we only utilise strictly necessary cookies to deploy the site to you.

The student and teacher portal of my.projectq.co uses cookies as part of the normal running of the system. The information stored in a cookie is minimal and is not used for any other purpose than to maintain an active session on my.projectq.co.

5 Personal data you submit

The personal data you enter into Project Q is not used, shared or accessed via Project Q/AQA or shared with any third party outside of AQA Group. Following appropriate security checks and confirmation from the school coordinator we are able to view data to help resolve issues such as a password reset or specific query.

Your school is ultimately responsible for the data submitted to the Project Q platform. At the end of your school/Project Q subscription (and you do not wish to renew) your data will be erased from our production servers and removed from system backups at the end of their cycle.

6 Data processing activities

Please see below listing of processing activities conducted through use of the Project Q platform.

Purpose of processing	Categories of individuals	Categories of personal data
Data Controller <i>BDM / Sales</i>	<i>Customers</i>	<i>School contact details School Staff contact details (name/email/phone) Communication, activity and notes</i>
Data Controller	<i>Suppliers</i>	<i>Supplier contact details and financial (bank)</i>

Suppliers/Orders		<i>Supplier Staff contact details (name/email/phone)</i> <i>Communication, activity and notes</i>
Data Processor Project Q Service: Data Implementation	Customers	Student name, candidate number, email address and project work viewed within the Project Q Software and security audit logs
Data Processor Project Q: Data Backup	Customers	Project Q data (as above) <i>School contact details</i> <i>Staff contact details (email/phone)</i> <i>Communication, activity and notes</i>
Data Controller Technical Support	Customers	<i>User contact details (name/email/phone)</i> Communication, activity and notes including reference to data in fault resolution

Data will be retained in line with AQA Education’s retention policy and schedule. For further details of the retention periods of the Project Q platform and how these apply to your data, please contact us.

7 Third parties

We will never disclose any personal information entered into the Project Q platform to any third party outside of AQA Group of companies. Any requests for support will be passed directly to the relevant contact within the AQA Group of companies.

8 Security

Secure communications

Once you have logged into the Project Q platform at <https://my.projectq.co> all communication between your web browser and our server is secured using HTTPS TLS 1.2/1.3. Data is also encrypted at rest and further encrypted during our backup cycles.

Password security

We encourage strong password usage by implementing a mechanism for users registering with the Project Q platform to make use of the Microsoft Single Sign On option. We are unable to access passwords as these are stored using a ‘one way’ encryption method. Users can request a password reset which is sent to their registered email address.

Physical security

Our dedicated servers are hosted in a secure private cloud in London, England. The data centre is protected by multi-layered physical security and all access into and out of the building is monitored by a visual human check and proximity access tags along with 24/7/365 video surveillance.

Staff security

The Project Q platform is supported by a small, dedicated team supported by the wider AQA Education Group. All members of staff who require access to data are validated through Disclosure and Barring Service.

Backups

Our servers are protected by a robust mirroring system into a secondary data centre. Regular backups are performed routinely at the data centre. In addition, a disaster recovery backup is transferred and stored securely at our offices. Our disaster recovery plan would ensure that a serious outage and failure at our data centre could ensure that the Project Q platform would be fully running from 2 – 12 hours.

Monitoring

Our servers and services are monitored 24/7/365 by an array of external monitoring services. Failures or concerns to the service are communicated directly to our ICT team for speed resolution.

Data breaches

We take data security seriously and have many measures and specialist networking services and monitoring systems to help keep data secure. Data breaches will be disclosed to clients if required and we will support the Data Controller and Data Protection Authorities as per Data Protection Legislation.

9 Your rights

You have several rights under the data privacy legislation. This includes, under certain circumstances, the right to:

- **Access your data** – you can access your data at any time if you cannot self-serve. Please be specific about what you want to know. We'll need to confirm your identity before we release data to you.
- **Correct your data** – you can ask us to correct any data we hold about you that's inaccurate.
- **Request erasure** – you have the right to 'be forgotten', in certain circumstances, mainly to withdraw consent at any time if consent is relied upon. This doesn't apply if it would prevent the performance of a contract with you. Or if there's another legal requirement for us to keep your data. If erasure is not possible, you may be able to ask us to restrict processing.
- **Request the restriction of processing of your data** – you can suspend the processing of your data under certain circumstances. For example, pending a review of the accuracy of the data or after you have objected to our use of the data, and we need to establish whether we may lawfully continue processing it.
- **Request the transfer of your data** – in some cases, you can ask us to transfer the data you originally provided to us to yourself or to another company. This only applies to data you provided directly, or that we observed about you through automated means.
- **Object to the processing of your data** – you can object to our processing of your data for direct marketing purposes, based on our stated legitimate interests (defined in the table above). In some cases, we may have compelling lawful grounds to process your data which override your rights and freedoms.
- **Object to automated decision-making** – you can also object to the processing of your personal data where profiling is being used to make assumptions about your behaviours or preferences; for example, to target marketing communications. You have the right not to be subject to automated decision-making and can require that any such decisions are reviewed by a human.

10 Making a request or complaint

We take the handling of your personal data very seriously. But, if you feel your data is being handled in a way that breaches data protection legislation, you can make a complaint.

We may charge a reasonable fee if your request is unfounded, repetitive or excessive. We can refuse to follow your request in these circumstances. We'll always try to respond to any legitimate request within one month. It may take us longer if your request is complex or you've made many requests. In this case, we'll let you know and keep you updated.

As a security measure, we may ask you to confirm your identity. This ensures that:

- personal data isn't disclosed to any person who doesn't have a right to receive it
- your right to access your data or to exercise any of your other rights.

We may also contact you to ask you for further information in relation to your request to speed up our response. You also have the right to complain to the UK Information Commissioner at <https://ico.org.uk/global/contact-us>

11 Contact us

If you have any questions about this new engagement, or how AQA Education and Project Q collect, hold or process your data; or you wish to exercise your rights, please contact the Data Protection Officers below for each company:

- AQA Education - GDPRenquiries@aqa.org.uk.
- Project Q - support@projectq.co

12 Version control

Document Control			
Date	Version	Actioned By	Summary Changes
20/03/2019	v 1.0	A Cree	Initial Issue
10/08/2022	v 1.1	A Cree	Update to documents
11/04/2023	v 1.2-1.4	G Dwyer	Update re: AQA acquisition