



## **Privacy Policy**

### **Live Chat**

We use a live chat service on our website provided by a third party called Chat Heroes. Their privacy policy is available here: <http://chatheroes.com/privacy-policy/>

When you use our live chat service, we automatically collect the following information: IP address, browser type and operating system.

We will also collect your name, phone number, email address and any other information which you provide to us in order to follow up on an enquiry. If your enquiry is dependant on location, we may also need to confirm a postcode.

### **Transfer and storage of your information**

The information collected by our live chat service is processed by Chat Heroes and their third party chat service provider, SnapEngage, the privacy policy of which is available here: <https://snapengage.com/privacy-policy/>. SnapEngage stores your information for 60 days.

A transcript of your live chat is forwarded to us by SnapEngage via email and stored on our Office365 email provider's servers. Our email provider is Microsoft and their privacy policy is available here <https://privacy.microsoft.com/en-us/PrivacyStatement>.

### **Live Chat Cookies**

Our live chat service uses functional cookies to allow it to function properly. For further information on these cookies, please see our cookies policy, which is available here: <https://www.schoolbusinessservices.co.uk/privacy/> [section 10].

The live chat cookies that may be used are listed below:

Cookie Name	Type	Party	Description
SnapABugRef	Functional - Live Chat (Session)	First Party	Chat function that tracks the origin and site entry
SnapABugVisit	Functional - Live Chat (Session)	First Party	Chat function for the detection of new session
SnapABugChatWindow	Functional - Live Chat (Session)	First Party	Chat function that tracks the chat box position and minimize status.
SnapABugChatSession	Functional - Live Chat (Session)	First Party	Chat function for the tracking of chat in progress
SnapABugNoProactiveChat	Functional - Live Chat (Session)	First Party	Chat function flag to avoid proactively prompting visitors again
SnapABugChatPoll	Functional - Live Chat (Session)	First Party	Chat function tracking of the chat in progress transcript position
SnapABugChatMessage	Functional - Live Chat (Session)	First Party	Chat function to ensure the message typed by a visitor is persistence across pages
SnapABugChatView	Functional - Live Chat (Session)	First Party	Chat function to check logic handling
SnapABugUserEmail	Functional - Live Chat (Persistent - 1 year)	First Party	Chat function for visitor email address used to prepopulate the pre-chat window. This information is scrambled (not readable in plain text)
SnapABugBanned	Functional - Live Chat (Persistent - 30 days)	First Party	Chat function tracking whether the visitor is banned for chatting
SnapABugMinimizeStashCookie	Functional - Live Chat (Session)	First Party	Chat function for the detection of new messages while minimized so they persist during navigation.
SnapABugHistory	Functional - Live Chat (Persistent - 1 year)	First Party	Chat function that registers a unique ID that identifies the user's device to keep track of the visitor visits and last chats to present history to chat agent

SnapEngage transfers and stores your information outside of the European Economic Area. For further information on the safeguards used, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests:** we have a legitimate interest in collecting your IP address, browser information and device to better understand our customers as they access our website and live chat service.

We have a legitimate interest in collecting your name, email address, phone number and any additional information you provide in order to be able to respond to your enquiry and messages you submit via our live chat service. We ask for your phone number and email address in case we are unable to reach you on one of those means and to ensure that we are able to respond to your enquiry as quickly and effectively as possible.

We ask for your name so that we know who we will be contacting, to allow us to ensure we are contacting the correct person and for legal and evidential purposes so that we can identify what we have said to whom and when.

**Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract with you (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract:** where your message or enquiry relates to our goods and services, we will collect your information in order to enter into a contract with you or take steps to enter into a contract with you. This includes the collection of your name, email address and phone number so we know who we are contracting with and so that we can provide you with the information you need in order to be able to enter into a contract with you.

### **How Long We Retain Your information**

**Live chat transcripts:** we store the information from our live chat service for a maximum period of seven (7) years in order to defend against legal claims. This period is the maximum period in which a claim form can be issued and served in respect of contract and tort claims under the Limitation Act 1980 under English law.

### **Transfers of your information outside the European Economic Area**

#### **Live chat**

Information you submit to us by email is transferred outside the EEA and stored on SnapEngage's servers in the United States of America.

**Country of storage:** United States of America. This country is not subject to an adequacy decision by the European Commission.

**Safeguard(s) used:** our SnapEngage has self-certified its compliance with the EU-U.S. Privacy Shield which is available <https://www.privacyshield.gov/>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en)

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