



YSGOL GYMRAEG

Bro Teyrnnon

Polisi Hysbysiad Preifatrwydd
Privacy Notice Policy

Document Control

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Privacy Notice Policy

What the School, Local Authority, Education Achievement Service for South East Wales and Welsh Government does with the Educational Information they hold on Children and Young People

Subject

To meet the requirements of the Data Protection Act 1998, schools are required to issue a Privacy Notice to children and young people and/or parents and guardians summarising the information held on record about children and young people, why it is held, and the third parties to whom it may be passed.

This Privacy Notice provides information about the collection and processing of children's or young people's personal and performance information by the Welsh Government, Newport City Council (LA), the Education Achievement Service for South East Wales (EAS) and Ysgol Gymraeg Bro Teyrnnon.

The collection of personal information

The school collects information about children and young people and their parents or legal guardians when children and young people enrol at the school. The school also collects information at other key times during the school year and may receive information from other schools/Early Years providers when children and young people transfer.

The School processes the information it collects to administer the education it provides to children and young people. For example:

- the provision of educational services to individuals;
- monitoring and reporting on pupils'/children's educational progress;
- monitoring and reporting on pupil's/children's conduct;
- the provision of welfare, pastoral care and health services;
- the giving of support and guidance to children and young people, their parents and legal guardians;
- the organisation of educational events and trips;
- the planning and management of the school.

Welsh Government, Local Authority (LA) and the Education Achievement Service for South East Wales (EAS)

The Welsh Government receives information on school pupils normally as part of the Pupil Level Annual Schools Census (PLASC). The Welsh Government may receive information on children who attend LA funded early years provision in non-maintained settings. The Welsh Government uses this personal information for research (carried out in a way that ensures individual children and young people cannot be identified) and for statistical purposes, to inform, influence and improve education policy and to monitor the performance of the education service as a whole. Examples of the sort of statistics produced can be viewed at www.wales.gov.uk/statistics

The LA and the EAS also use the personal information collected to do research. They use the results of this research to make decisions on policy and the funding of schools, to calculate the performance of schools and help them to set targets. The research is carried out in a way that ensures individual children and young people cannot be identified.

In addition the Welsh Government, LAs and the EAS receive information regarding National Curriculum assessment and public examination results and attendance data at individual pupil level.

Personal information held

The sort of personal information that will be held includes:

- personal details such as name, address, date of birth, child/young person identifiers and contact details for parents and guardians;
- information on any special educational needs;
- information on performance in internal and national assessments and examinations;
- information on conduct and any disciplinary action taken;
- information on the ethnic origin and national identity of children and young people (this is used only to prepare summary statistical analyses);
- details about children's and young people's immigration status (this is used only to prepare summary statistical analyses);
- medical information needed to keep children and young people safe while in the care of the school;
- information on attendance and any disciplinary action taken;
- information about the involvement of social services with individual children and young people where this is needed for the care of the child/young person.

Organisations which may share personal information

Information held by the school, Early Years providers, LA, the EAS and the Welsh Government on children and young people, their parents or legal guardians may also be shared with other organisations when the law allows, for example:

- other education and training bodies, including schools, when children and young people are applying for courses or training, transferring schools or seeking guidance on opportunities;
- bodies doing research for the Welsh Government, LA and schools/Early Years providers, as long as steps are taken to keep the information secure;
- central and local government for the planning and provision of educational services;
- social services and other health and welfare organisations where there is a need to share information to protect and support individual children and young people;
- various regulatory bodies, such as ombudsmen and inspection authorities, where the law requires that information be passed on so that they can do their work;
- the Office of National Statistics (ONS) in order to improve the quality of migration and population statistics
- examination bodies and other education based testing services for the purpose of administering and awarding pupil results
- bodies doing work on behalf of Welsh Government initiatives such as Hwb, the all Wales digital learning platform

Children and young people have certain rights under the Data Protection Act, including a general right to be given access to personal data held about them by any "data controller." The presumption is that, by the age of 12, children and young people have sufficient maturity to understand their rights and to make an access request themselves if they wish. A parent would normally be expected to make a request on a child's behalf if the child is younger.

If you wish to access your personal data, or that of your child, then please contact the relevant organisation in writing. Details of this organisation can be found on the following website www.newportlearn.net/broteyrnon/ or www.newport.gov.uk. For those children and young people or parents where this is not practical, a hard copy can be obtained from the school by contacting the Head Teacher in writing.

Collecting attendance and personal characteristics data from schools from September 2020

We collect a wide range of data about you on an annual basis, and this is explained in more detail in [this privacy notice](#).

Due to the Covid-19 pandemic and schools having to adapt to new ways of working, we need to be able to collect attendance data more frequently than once a year. Collecting up to date information will support us and provide the evidence we need to understand the impact of the Covid-19 pandemic on attendance and how we can support schools.

How frequently are we collecting this data?

We will keep the frequency of collection under regular review. Initially the data will be collected every week but we may need to collect the data more regularly.

For which pupils are we collecting data?

We are collecting data for every pupil in a maintained school as at September 2020.

What information are we collecting?

We are collecting the following information about you every week:

- UPN
- Forename
- Middle name(s)
- Surname
- Gender
- DOB
- Home postcode
- Ethnic background
- Eligibility for free school meals
- Additional learning needs
- English as an additional language
- Attendance code for each half day session in that week

Why are we collecting this information?

This information is needed as a key part of our response and planning during the ongoing Covid-19 pandemic. The data will be collected every week to ensure that the latest data is available to inform our response. The data will be used for statistical and research purposes only and no decisions will be made about you using this data.

How will we use this information?

We will use the data in the same ways that we have listed in our [main privacy notice](#).

Will we be sharing the data?

We may share this information with those organisations listed in the [main privacy notice](#).

How long will we keep the information about you?

We will keep the data that identifies you until you are 25 years old.

What is the legal basis for collecting this data?

Section 538 of the Education Act 1996 provides the legal basis for collecting this data. This requires schools to make such reports and returns, and give such information, to Welsh Ministers as they may require for their functions in relation to education.

Your rights under the GDPR

Your rights are explained in full in the [main privacy notice](#).

Other information

The Welsh Government, LA and school place a high value on the importance of information security and have a number of procedures in place to minimise the possibility of a compromise in data security.

The Welsh Government, LA and school//Early Years provider will endeavour to ensure that information is kept accurate at all times. Personal information will not be sent outside the United Kingdom.

Your rights under the Data Protection Act 1998

The Data Protection Act 1998 gives individuals certain rights in respect of personal information held on them by any organisation. These rights include:

- the right to ask for and receive copies of the personal information held on yourself, although some information can sometimes be legitimately withheld;
- the right, in some circumstances, to prevent the processing of personal information if doing so will cause damage or distress;
- the right to ask for wrong information to be put right;
- the right to seek compensation if an organisation does not comply with the Data Protection Act 1998 and you personally suffer damage;
- in some circumstances, the parent or legal guardian of a child or young person may have a right to receive a copy of personal data held about a child/young person in their legal care. Such cases will be considered on an individual basis where the individual concerned is deemed to have insufficient understanding of their rights under the Act.

You also have the right to ask the Information Commissioner, who enforces and oversees the Data Protection Act 1998, to assess whether or not the processing of personal information is likely to comply with the provisions of the Act.

Seeking further information

For further information about the personal information collected and its use, if you have concerns about the accuracy of personal information, or wish to exercise your rights under the Data Protection Act 1998, you should contact:

- the school on (01633) 850804;
- your LA on (01633) 656656;
- the EAS on (01443) 864963;
- the Welsh Government's data protection officer at the Welsh Government, Cathays Park, Cardiff, CF10 3NQ;
- the Information Commissioner's office help line on 01625 545 745 or 0303 123 1113;
- Information is also available from www.ico.gov.uk.

Polisi Hysbysiad Preifatrwydd

Yr Hyn y mae'r Ysgol, yr Awdurdod Lleol, Gwasanaeth Cyflawniad Addysg De Ddwyrain Cymru, a Llywodraeth Cymru yn ei wneud â'r Wybodaeth Addysgol y maent yn ei chadw am Blant a Phobl Ifanc

Pwnc Trafod

Er mwyn bodloni gofynion Deddf Diogelu Data 1998, mae'n ofynnol i ysgolion roi Hysbysrwydd Preifatrwydd i blant a phobl ifanc a/neu rieni a gwarcheidwaid yn crynhoi'r wybodaeth sy'n cael ei chadw am blant a phobl ifanc mewn cofnodion, gan nodi pam mae'r wybodaeth yn cael ei chadw, a'r bobl neu'r sefydliadau y ceir rhoi'r wybodaeth honno iddynt.

Mae'r Hysbysrwydd Preifatrwydd hwn yn rhoi gwybodaeth am yr hyn sy'n digwydd pan fo Llywodraeth Cymru, Cyngor Dinas Casnewydd, Gwasanaeth Cyflawniad Addysg De Ddwyrain Cymru ac Ysgol Gymraeg Bro Teyrnnon yn casglu ac yn prosesu gwybodaeth bersonol am blant a phobl ifanc, ynghyd â gwybodaeth am eu perfformiad.

Casglu gwybodaeth bersonol

Mae'r ysgol yn casglu gwybodaeth am blant a phobl ifanc ac am eu rhieni neu eu gwarcheidwaid cyfreithiol pan fo plant a phobl ifanc yn cofrestru gyda'r ysgol. Mae'r ysgol yn casglu gwybodaeth ar adegau allweddol eraill yn ystod y flwyddyn ysgol hefyd ac mae'n bosibl y byddant yn cael gwybodaeth oddi wrth ysgolion/darparwyr Blynnyddoedd Cynnar eraill pan fo plant a phobl ifanc yn newid ysgol/darparwr.

Mae'r Ysgol yn defnyddio'r wybodaeth a gesglir i weinyddu'r addysg y mae'n ei darparu ar gyfer plant a phobl ifanc. Er enghraifft:

- darparu gwasanaethau addysgol i unigolion;
- monitro ac adrodd am gynnydd addysgol y disgyblion/plant;
- darparu gwasanaethau lles, gofal bugeiliol a gwasanaethau iechyd;
- rhoi cefnogaeth ac arweiniad i blant a phobl ifanc, eu rheini a'u gwarcheidwaid cyfreithiol;
- trefnu digwyddiadau a theithiau addysgol;
- cynllunio a rheoli'r ysgol.

Llywodraeth Cymru a'r Awdurdod Lleol

Fel arfer, mae gwybodaeth am ddisgyblion ysgol yn dod i law Llywodraeth Cymru fel rhan o'r Cyfrifiad Ysgolion Blynnyddol ar Lefel Disgyblion (CYBLD). Mae'n bosibl y bydd Llywodraeth Cymru yn cael gwybodaeth am blant mewn darpariaeth Blynnyddoedd Cynnar sy'n cael ei hariannu gan yr ALI ac sy'n cael ei chynnig mewn lleoliadau nas cynhelir. Mae Llywodraeth Cymru yn defnyddio'r wybodaeth bersonol hon er mwyn gwneud gwaith ymchwil (sy'n cael ei wneud mewn modd sy'n sicrhau na ellir adnabod plant a phobl ifanc) ac at ddibenion ystadegol, er mwyn llywio polisi addysg, dylanwadu arno a'i wella, ac er mwyn monitro perfformiad y gwasanaeth addysg yn ei gyfanrwydd. Cewch weld enghreifftiau o'r mathau o ystadegau a gaiff eu paratoi yn www.wales.gov.uk/statistics

Mae'r ALI a Gwasanaeth Cyflawniad Addysg De Ddwyrain Cymru (GCA) hefyd yn defnyddio'r wybodaeth bersonol a gesglir i wneud gwaith ymchwil. Maent yn defnyddio canlyniadau'r ymchwil hon i wneud penderfyniadau am bolisi ac am ariannu ysgolion, i asesu perfformiad ysgolion a'u helpu i osod targedau. Mae'r ymchwil yn cael ei gwneud mewn modd sy'n sicrhau na ellir adnabod plant a phobl ifanc unigol.

Mae Llywodraeth Cymru, ALLau a'r GCA yn cael gwybodaeth hefyd am ganlyniadau asesiadau'r Cwricwlwm Cenedlaethol ac arholiadau cyhoeddus, ynghyd â data am bresenoldeb ar lefel disgyblion unigol.

Yr wybodaeth bersonol a gedwir

Dyma'r math o wybodaeth bersonol a gedwir:

- manylion personol megis enw, cyfeiriad, dyddiad geni, dynodydd y plentyn/person ifanc a manylion cyswllt rhieni a gwarcheidwaid;
- gwybodaeth am unrhyw anghenion addysgol arbennig;
- gwybodaeth am berfformiad mewn asesiadau ac arholiadau mewnol a chenedlaethol;
- gwybodaeth am dras ethnig a hunaniaeth genedlaethol plant a phobl ifanc (dim ond er mwyn paratoi dadansoddiadau ystadegol cryno y defnyddir yr wybodaeth hon);
- manylion am statws mewnfudo plant a phobl ifanc (dim ond er mwyn paratoi dadansoddiadau ystadegol cryno y defnyddir yr wybodaeth hon);
- gwybodaeth feddygol y mae ei hangen er mwyn cadw'r plant a'r bobl ifanc yn ddiogel tra bônt dan ofal yr ysgol;
- gwybodaeth am bresenoldeb ac am unrhyw gamau disgyblu a gymerwyd;
- gwybodaeth am unrhyw gysylltiad rhwng y gwasanaethau cymdeithasol a phlant a phobl ifanc unigol, os oes angen gysylltiad o'r fath er mwyn gofalu am y plentyn/person ifanc.

Sefydliadau sy'n cael rhannu gwybodaeth bersonol

Caiff yr ysgol, darparwyr Blynyddoedd Cynnar, yr ALL, y GCA, a Llywodraeth Cymru rannu'r wybodaeth a gedwir am blant a phobl ifanc, ac am eu rhieni neu'u gwarcheidwaid cyfreithiol gyda sefydliadau eraill pan fydd y gyfraith yn caniatáu hynny, er enghraifft:

- cyrff addysg a chyrff hyfforddi eraill, gan gynnwys ysgolion, pan fydd plant a phobl ifanc yn gwneud cais i fynd ar gyrsiau, i gael hyfforddiant, i newid ysgol neu pan fyddant yn gofyn am gyngor ar gyfleoedd;
- cyrff sy'n gwneud ymchwil ar ran Llywodraeth Cymru, yr ALL a'r ysgolion/darparwyr Blynyddoedd Cynnar, cyn belled ag y cymerir camau i gadw'r wybodaeth yn gyfrinachol;
- llywodraeth ganolog a lleol er mwyn cynllunio a darparu gwasanaethau addysgol;
- gwasanaethau cymdeithasol a sefydliadau iechyd a lles eraill pan fo angen rhannu gwybodaeth er mwyn amddiffyn a chynorthwyo plant a phobl ifanc unigol;
- amryfal gyrff rheoleiddio, megis ombwdsmyd ac awdurdodau arolygu, pan fo'r gyfraith yn dweud bod yn rhaid trosglwyddo'r wybodaeth honno er mwyn iddynt allu gwneud eu gwaith;
- y Swyddfa Ystadegau Gwladol er mwyn gwella ansawdd yr ystadegau am ymfudo a'r boblogaeth
- cyrff arholiadau a gwasanaethau asesiad eraill ar gyfer gweinyddu a dyfarnu canlyniadau disgyblion
- cyrff sy'n gwneud gwaith ar ran mentrau Llywodraeth Cymru, megis Hwb, llwyfan dysgu Cymru gyfan.

Mae gan blant a phobl ifanc hawliau penodol o dan y Ddeddf Diogelu Data, gan gynnwys hawl gyffredinol i gael gweld data personol y mae unrhyw "reolydd data" yn eu cadw amdanynt. Rhagdybir bod plant a phobl ifanc yn ddigon aeddfed yn 12 oed i ddeall eu hawliau ac i wneud cais drostynt eu hunain i weld yr wybodaeth, os dyna'u dymuniad. Fel arfer, byddai disgwyl i riant wneud cais ar ran plentyn sy'n ifancach na hynny.

Os hoffech weld y data personol sy'n cael eu cadw amdanoch chi, neu am eich plentyn, dylech anfon cais ysgrifenedig at y sefydliad perthnasol. Mae manylion y sefydliad hwn i'w weld ar y wefan a ganlyn: www.newportlearn.net/broteyrnon/ neu www.newport.gov.uk. Os nad yw hyn yn ymarferol i blant a phobl ifanc na'u rhieni, dylent ofyn i'r ysgol am gopi caled drwy gysylltu â'r Pennaeth yn ysgrifenedig.

Casglu ystadegau presenoldeb a nodweddion personol oddi wrth ysgolion o fis Medi 2020 ymlaen

Rydym yn casglu ystod eang o ddata amdanoch yn flynyddol, ac eglurir hyn yn fanylach yn yr [hysbysiad preifatrwydd hwn](#).

Oherwydd y pandemig Covid-19 ac ysgolion yn gorfod addasu i ffyrdd newydd o weithio, mae angen i ni allu casglu data presenoldeb yn amlach nag unwaith y flwyddyn. Bydd casglu'r wybodaeth ddiweddaraf yn ein cefnogi ac yn darparu'r dystiolaeth sydd ei hangen arnom i ddeall effaith pandemig Covid-19 ar bresenoldeb a sut y gallwn gefnogi ysgolion.

Pa mor aml ydyn ni'n casglu'r data hwn?

Byddwn yn cadw amllder y casglu dan adolygiad rheolaidd. I ddechrau, bydd y data'n cael ei gasglu bob wythnos ond efallai y bydd angen i ni gasglu'r data yn fwy aml.

Pa ddisgyblion ydym ni'n casglu data amdanynt?

Rydym yn casglu data am bob disgybl mewn ysgolion a gynhelir o fis Medi 2020 ymlaen.

Pa wybodaeth ydym ni'n ei chasglu?

Rydym yn casglu'r wybodaeth ganlynol amdanoch bob wythnos:

- Rhif unigryw'r disgybl (UPN)
- Enw cyntaf
- Enw(au) canol
- Cyfenw
- Rhywedd
- Dyddiad geni
- Cod post cartref
- Cefndir ethnig
- Cymhwysra ar gyfer prydau ysgol am ddim
- Anghenion dysgu ychwanegol
- Saesneg fel iaith ychwanegol
- Cod presenoldeb ar gyfer pob sesiwn hanner diwrnod yr wythnos honno

Pam ydym ni'n casglu'r wybodaeth hon?

Mae angen yr wybodaeth hon fel rhan allweddol o'n hymateb a chynllunio yn ystod y pandemig Covid-19 parhaol. Bydd y data'n cael ei gasglu'n rheolaidd i sicrhau bod y data diweddaraf ar gael i lywio ein hymateb. Byddwn yn defnyddio'r data at ddibenion ystadegol a gwaith ymchwil yn unig ac ni fydd unrhyw benderfyniadau'n cael eu gwneud yn eich cylch yn defnyddio'r data hyn.

Sut y byddwn yn defnyddio'r wybodaeth hon?

Byddwn yn defnyddio'r data yn yr un ffyrdd ag yr ydym wedi'u rhestru yn ein [prif hysbysiad preifatrwydd](#)

A fyddwn ni'n rhannu'r data?

Mae'n bosib byddwn yn rhannu'r data gyda'r sefydliadau yr ydym wedi'u rhestru yn ein [prif hysbysiad preifatrwydd](#)

Pa mor hir y byddwn yn cadw'r wybodaeth amdanoch?

Byddwn yn cadw'r data sy'n ei gwneud yn bosibl eich adnabod chi hyd nes y byddwch yn 25 oed.

Beth yw'r sylfaen gyfreithiol ar gyfer casglu'r data hwn?

Mae adran 538 o Ddeddf Addysg 1996 yn darparu'r sylfaen gyfreithiol ar gyfer casglu'r data hwn. Mae hyn yn ei gwneud yn ofynnol i ysgolion wneud unrhyw adroddiadau a ffurflenni, a rhoi unrhyw wybodaeth, i Weinidogion Cymru y bydd eu hangen arnynt ar gyfer eu swyddogaethau mewn perthynas ag addysg.

Eich hawliau o dan y GDPR

Esbonnir eich hawliau yn llawn yn ein [prif hysbysiad preifatrwydd](#).

Gwybodaeth arall

Mae cadw gwybodaeth yn ddiogel yn bwysig iawn i Lywodraeth Cymru, i'r ALL ac i'r ysgol, ac mae ganddynt nifer o weithdrefnau er mwyn lleihau unrhyw berygl posibl i ddiogelwch yr wybodaeth honno.

Bydd Llywodraeth Cymru, yr ALL a'r ysgol yn ceisio sicrhau bod yr wybodaeth a gedwir yn gywir bob amser. Ni fydd gwybodaeth bersonol yn cael ei hanfon y tu allan i'r Deyrnas Unedig.

Eich hawliau o dan Ddeddf Diogelu Data 1998

Mae Deddf Diogelu Data 1998 yn rhoi hawliau penodol i unigolion o ran yr wybodaeth bersonol a gedwir amdanynt gan unrhyw sefydliad. Ymhlith yr hawliau hyn mae:

- yr hawl i ofyn am weld a chael copiâu o'r wybodaeth bersonol a gedwir amdanoch chi, er bod cyfiawnhad weithiau dros gadw peth gwybodaeth yn ôl;
- yr hawl, o dan rai amgylchiadau, i atal gwybodaeth bersonol rhag cael ei phrosesu pe byddai hynny'n achosi niwed neu ofid;
- yr hawl i ofyn am gael cywiro gwybodaeth sy'n anghywir;
- yr hawl i ofyn am iawndal os nad yw sefydliad yn cadw at Ddeddf Diogelu Data 1998 a'ch bod chi'n bersonol yn dioddef niwed;
- o dan rai amgylchiadau mae'n bosibl y bydd gan riant neu warcheidwad cyfreithiol plentyn neu berson ifanc yr hawl i gael copi o'r data personol a gedwir am blentyn/person ifanc sydd o dan eu gofal cyfreithiol hwy. Bydd achosion o'r fath yn cael eu hystyried yn unigol os bernir nad oes gan yr unigolyn ddigon o ddealltwriaeth o'i hawliau o dan y Ddeddf.

Mae gennych yr hawl hefyd i ofyn i'r Comisiynydd Gwybodaeth, sy'n gyfrifol am orfodi a goruchwyllo Deddf Diogelu Data 1998, asesu a yw'n debygol bod yr wybodaeth wedi cael ei phrosesu yn unol â darpariaethau'r Ddeddf ai peidio.

Gofyn am ragor o wybodaeth

I gael rhagor o wybodaeth am yr wybodaeth bersonol a gasglwyd ac ynghylch sut mae'n cael ei defnyddio, neu os ydych yn pryderu ynghylch pa mor gywir yw'r wybodaeth honno, neu os ydych yn dymuno arfer eich hawliau o dan Ddeddf Diogelu Data 1998, dylech gysylltu â:

- yr ysgol ar (01633) 850804;
- eich ALL (01633) 656656;
- y GCA ar (01443) 864963
- swyddog diogelu data Llywodraeth Cymru, Llywodraeth Cymru, Parc Cathays, Caerdydd, CF10 3NQ;

- llinell gymorth swyddfa'r Comisiynydd Gwybodaeth ar 01625 545 745 neu 0303 123 1113;
- mae gwybodaeth ar gael hefyd oddi wrth www.ico.gov.uk.

EduKey Privacy Policy

1. Introduction to this Policy

1.1. This privacy policy ("Policy") relates to:

1.1.1. the website at <https://www.edukey.co.uk>, any subdomain or any such related website and/or mobile application for such website (together the "Website"); and/or

1.1.2. the System, as set out in the relevant Purchase Order or system registration.

1.2. You should read this Policy carefully as it contains important information about how we will use your Information (as defined below in clause 4.1). In certain circumstances (see below) you will be required to indicate your consent to the processing of your Information as set out in this Policy when you first submit such Information to or through the Website. For further information about consent see clause 7 below.

1.3. We may update this Policy from time to time in accordance with clause 18 below. This Policy was last updated on June 3rd 2018.

2. About us

2.1. The terms "Edukey" or "us" or "we" refer to Edukey Education Limited, the owner of the Website. We are a company registered in England and Wales under company number 05855261 whose registered office is at Tes Global Ltd, 26 Red Lion Square, London, WC1R 4HQ. The term "you" refers to the individual accessing and/or submitting Information to the Website.

2.2. We have developed and provide access to the Systems which are software tools for use by schools, colleges and universities to manage pupil information.

3. Data Protection

3.1. References in this Policy to:

3.1.1. "Privacy and Data Protection Requirements" means: the Data Protection Act 2018 ("DPA"); the General Data Protection Regulation 2016/679 ("GDPR") or any equivalent provision which may replace the GDPR following the formal political separation of the United Kingdom from the European Union; the Regulation of Investigatory Powers Act 2000; the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699); the Electronic Communications Data Protection Directive (2002/58/EC); the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003); and all applicable laws and regulations which may be in force from time to time relating to the processing of Personal Data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner or any other supervisory authority, and the equivalent of any of the foregoing in any relevant jurisdiction; and

3.1.2. "Personal Data", "Data Controller" and "Data Processor" and "processing" shall have the meanings given to them in the DPA or, from 25 May 2018, the GDPR.

3.2. This Policy applies to the Personal Data that we collect from you when you submit information to us via the Website or during the registration process. This policy does not apply to the information that the System stores or holds about any school staff, pupils or parents which is stored in accordance with our terms and conditions, which can be found at <https://www.edukey.co.uk/edukey-terms-conditions/> and our Information Sharing agreement with the relevant school.

3.3. For the purposes of applicable Privacy and Data Protection Requirements, we are a Data Controller and

therefore we are responsible for, and control the processing of, your Personal Data in accordance with applicable Privacy and Data Protection Requirements. "Personal Data" has a legal definition but, in brief, it refers to information from which a living person can be identified. Such information must be protected in accordance with applicable Privacy and Data Protection Requirements.

4. Information we may collect about you

4.1. When you use the Website, register for our applications or when you otherwise deal with us we may collect the following information about you ("Information"):

4.1.1. personal information including first and last name;

4.1.2. contact information including primary email address and/or primary phone number;

4.1.3. technical information including IP address, operating system, browser type and related information regarding the device you used to visit the Website, the length of your visit and your interactions with the Website; and

4.1.4. information obtained through our correspondence and monitoring in accordance with clause 12 below.

4.2. We may monitor your use of the Website through 'cookies' and similar tracking technologies. We may also monitor traffic, location and other data and information about users of the Website. Such data and information, to the extent that you are individually identifiable from it, shall constitute Information as defined above. However, some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. See clause 17 below for further information on our use of cookies.

4.3. Occasionally we may receive information about you from other sources, for example from any third party websites and applications that integrate or communicate with the Website in relation to you. If so, we will add this information to the Information we already hold about you in order to help us carry out the activities listed below.

5. How long we keep your Information

5.1. Subject to clause 5.2, we will keep your Information only for as long as we need to hold it for the purposes set out in clause 8 below.

5.2. If required, we will be entitled to hold Information for longer periods in order to comply with our legal or regulatory obligations.

6. Legal basis for processing your information

6.1. From 25 May 2018, under applicable Privacy and Data Protection Requirements we may only process your Information if we have a "legal basis" (i.e. a legally permitted reason) for doing so. For the purposes of this Policy, our legal basis for processing your Information is:

6.1.1. your consent (for which see clause 7 below); or

6.1.2. because the processing is necessary for the performance of a contract you have entered into with us (i.e. your contract with us as set out in this Policy and our website terms and conditions available at <https://www.edukekey.co.uk/edukekey-terms-conditions/> or for taking any preliminary steps that are required before you can enter into such a contract (provided we only do this at your request); or

6.1.3. subject to your rights set out in clause 15 below, the legitimate interest of providing services to our users through the Website, which requires the processing of your Information to enable us to provide these services.

7. Your consent to processing

7.1. As noted above, you will be required to give consent to certain processing activities before we can process your Information as set out in this Policy. Where applicable, we will seek this consent from you when you first

submit Information to or through the Website.

7.2. If you have previously given consent you may freely withdraw such consent at any time. You can do this through your account on the Website or by notifying us in writing (see clause 21 below).

7.3. If you withdraw your consent, and if we do not have another legal basis for processing your information (see clause 6 above), then we will stop processing your Information. If we do have another legal basis for processing your information then we may continue to do so subject to your legal rights (for which see clause 15 below).

7.4. Please note that if we need to process your Information in order to operate the Website and/or provide our services, and you object or do not consent to us processing your Information, the Website and/or those services may not be available to you.

8. How we use your Information

We may process Information held about you for the following purposes:

8.1. to operate, administer, maintain, provide, analyse and improve the Website and/or the System and the services available through the Website and/or related to the System;

8.2. to investigate and address any comments, queries or complaints made by you regarding the Website and/or the System, and any similar or related comments, queries or complaints from other users;

8.3. to ensure that content from the Website and/or the System is presented in the most effective manner for you and for your device;

8.4. to conduct research, statistical analysis and behavioural analysis (including anonymizing data for these purposes);

8.5. to provide insights based on aggregated, anonymous data collected through the research and analysis referred to at 8.4 above;

8.6. for administration, maintenance and improvements of the Website and/or the System and/or our services;

8.7. to allow you to participate in interactive features of the Website, including inputting information and providing feedback;

8.8. to contact you for marketing purposes (see 'Marketing and opting out' in clause 9 below);

8.9. to disclose your information to selected third parties as permitted by this Policy (see clause 10 below);

8.10. to notify you about changes to the Website and/or the System; and

8.11. to comply with our legal obligations, including obligations relating to the protection of Personal Data.

9. Marketing and opting out

9.1. If you have given permission, we may contact you by [telephone and email] about our products, services, promotions and special offers that may be of interest to you. We will inform you (before collecting your data) and seek your permission if we intend to use your data for such purposes. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time (see below).

9.2. If you have given permission, we may contact you by [mail, telephone and email] to provide information about products, services, promotions, special offers and other information we think may be of interest to you from carefully selected third parties. We will inform you (before collecting your data) if we intend to use your data for such purposes. If you would rather not receive such third party marketing information from us, or you

no longer wish to receive it, you can opt out at any time (see below).

9.3. If you have given permission, we may share your personal data with carefully selected third party organisations and business partners and they may contact you directly (unless you have asked them not to do so) by [mail, telephone and email] about products, services, promotions and special offers that may be of interest to you. We will inform you (before collecting your data) and seek your permission if we intend to disclose your data to third parties for such purposes. If you prefer not to receive direct marketing communications from our business partners, or you no longer wish to receive them, you can opt out at any time (see below).

9.4. You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes. If you wish to exercise this right, you should contact us by sending an email to support@edukey.co.uk, or contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request. Alternatively you can follow the unsubscribe instructions in emails you receive from us or them.]

10. Disclosure of your information

10.1. We may disclose your Information (including Personal Data):

10.1.1. to other companies within our group of companies (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006);

10.1.2. to our business partners, service providers or third-party contractors to enable them to undertake services for us and/or on our behalf (and we will ensure they have appropriate measures in place to protect your Information);

10.1.3. to any prospective buyer or seller (and their representatives) in the event that we sell or buy any business or assets;

10.1.4. if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation, including (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity; and

10.1.5. to other third parties if you have specifically consented to us doing so.

10.2. We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the Website. In such circumstances we do not disclose any information which can identify you personally.

10.3. If our whole business is sold or integrated with another business your Information may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

11. Keeping your Information secure

11.1. We will use technical and organisational measures in accordance with good industry practice to safeguard your Information, including the use of data encryption.

11.2. While we will use all reasonable efforts to safeguard your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Information that is transferred from you or to you via the internet.

12. Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purposes of provision of services, quality assurance, training, fraud prevention and compliance purposes. Any

information that we receive through such monitoring and communication will be added to the information we already hold about you and may also be used for the purposes listed in clause 8 above.

13. Overseas transfers

13.1. From time to time we may need to transfer your Information to countries outside the European Economic Area, which comprises the EU member states plus Norway, Iceland and Liechtenstein ("EEA").

13.2. Such countries may not have similar protections in place regarding protection and use of your data as those set out in this Policy. Therefore, if we do transfer your Information to countries outside the EEA we will take reasonable steps in accordance with applicable Privacy and Data Protection Requirements to ensure adequate protections are in place to ensure the security of your Information, including:

13.2.1. [use of approved contractual clauses; and]

13.2.2. [ensuring that we only transfer your Information to persons or entities that are appropriately authorised and/or accredited to process Personal Data in compliance with applicable Privacy and Data Protection Requirements.]]

13.3. By submitting your Information to us in accordance with this Policy you consent to these transfers for the purposes specified in this Policy.

14. Information about other individuals

If you give us information on behalf of a third party, you confirm that the third party has appointed you to act on his/her/their behalf and has agreed that you can: give consent on his/her/their behalf to the processing of his/her/their Information; receive on his/her/their behalf any data protection notices; and give consent to the transfer of his/her/their Information abroad (if applicable).

15. Your rights

If you are an individual, this section sets out your legal rights in respect of any of your Personal Data that we are holding and/or processing. If you wish to exercise any of your legal rights you should put your request in writing to us (using our contact details in clause 21 below) giving us enough information to identify you and respond to your request.

15.1. You have the right (which may be subject to the payment of a small fee depending on when you request this right) to request information about Personal Data that we may hold and/or process about you, including: whether or not we are holding and/or processing your Personal Data; the extent of the Personal Data we are holding; and the purposes and extent of the processing.

15.2. You have the right to have any inaccurate information we hold about you be corrected and/or updated. If any of the Information that you have provided changes, or if you become aware of any inaccuracies in such Information, please let us know in writing giving us enough information deal with the change or correction.

15.3. You have the right in certain circumstances to request that we delete all Personal Data we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Data for legal compliance purposes. If this is the case we will let you know.

15.4. You have the right in certain circumstances to request that we restrict the processing of your Personal Data, for example where the Personal Data is inaccurate or where you have objected to the processing (see clause 15.6 below).

15.5. You have the right to request a copy of the Personal Data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the 'right to data portability'). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means. If you request the right to data portability and it is

not available to you we will let you know.

15.6. You have the right in certain circumstances to object to the processing of your Personal Data. If so, we shall stop processing your Personal Data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know.

15.7. You have the right in certain circumstances not to be subject to a decision based solely on automated processing, for example where a computer algorithm (rather than a person) makes decisions which affect your contractual rights. Please note that this right is not available in all circumstances. If you request this right and it is not available to you we will let you know.

15.8. You have the right to object to direct marketing, for which see clause 9.4 above.

16. Complaints

If you have any concerns about how we collect or process your Information then you have the right to lodge a complaint with a supervisory authority, which for the UK is the UK Information Commissioner's Office ("ICO"). Complaints can be submitted to the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <https://ico.org.uk/concerns/>.

17. 'Cookies' and related software

17.1. Our software may issue 'cookies' (small text files) to your device when you access and use the Website (e.g. when you first visit our website). Cookies do not affect your privacy and security since a cookie cannot read data off your system or read cookie files created by other sites.

17.2. Our Website uses cookies and other tracking and monitoring software to: distinguish our users from one another; collect standard Internet log information; and to collect visitor behaviour information. The information is used to track user interactions with the Website and allows us to provide you with a good experience when you access the Website, helps us to improve our Website, and allows us to compile statistical reports on Website visitors and Website activity.

17.3. You can set your system not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our Website features may not function if you remove cookies from your system. For further general information about cookies please visit www.aboutcookies.org or www.allaboutcookies.org.

18. Changes to this Policy

18.1. We keep this Policy under regular review and may change it from time to time. If we change this Policy we will post the changes on this page, and place notices on other pages of the Website as applicable, so that you may be aware of the Information we collect and how we use it at all times. You are responsible for ensuring that you are aware of the most recent version this Policy as it will apply each time you access the Website.

18.2. This Policy was last updated on 3rd June 2018.

19. Links to other websites

Our Website may contain links to other websites. This Policy only applies to our Website. If you access links to other websites any Information you provide to them will be subject to the privacy policies of those other websites.

20. Accessibility

This Policy aims to provide you with all relevant details about how we process your Information in a concise, transparent, intelligible and easily accessible form, using clear and plain language. If you have any difficulty in reading or understanding this Policy, or if you would like this Policy in another format (for example audio, large print or braille), please get in touch with us.

21. Contact us

We welcome your feedback and questions on this Policy. If you wish to contact us, please email us at support@edukey.co.uk or call us on 01348 800 100

Seesaw Privacy Policy

Effective: October 18, 2021

1. INTRODUCTION

Seesaw's mission is to create an environment where students can be their best.

Protecting your privacy is fundamental to our mission and business. This Privacy Policy governs the use of Personal Information collected by our websites at seesaw.me, the Seesaw Applications, and any other online or offline offerings (collectively "the Seesaw Service", "the Service", "Seesaw", "we", "us", or "our"). This includes, for example, personally identifiable information that we collect when you create an account ("Account Information"), content added to class journals ("Journal Content"), activities teachers create ("Activities"), and messages ("Messages") sent via Seesaw.

In order to use Seesaw, you must create an account and agree to this Privacy Policy. If you don't agree with this Privacy Policy, you cannot use Seesaw. You can contact us anytime with questions about this policy at privacy@seesaw.me.

For purposes of this Privacy Policy, "Personal Information" means any information about an identifiable individual or information that can be used to identify an individual, and includes "Personal Data" as that term is defined under the European Union General Data Protection Regulation ("GDPR"). "Student Data" means any personal information, metadata, or content directly attributable to a student user.

2. CHANGES TO OUR PRIVACY POLICY

[Seesaw may from](#) time to time make changes to this Privacy Policy to account for changes to our practices or applicable law. If we make changes to this Privacy Policy that materially affect your rights, we will notify you by email about these changes, and post a notice to our service, or otherwise contact you as required under applicable law. Your continued use of the Services following notification by Seesaw means you thereby agree to the new Privacy Policy.

3. SEESAW AND FERPA

Data collected by Seesaw includes Student Data from education records that are subject to the Family Educational Rights and Privacy Act, "FERPA", ("FERPA Records"), including student names, parent or guardian (collectively, "Family Member") names, Messages, and Journal Content. To the extent that Student Data includes FERPA Records, you designate Seesaw as a "School Official" (as that term is used in FERPA and its implementing regulations) under the direct control of the school with regard to the use and maintenance of the FERPA Records and Seesaw agrees to comply with FERPA.

4. SEESAW AND COPPA

The Children's Online Privacy Protection Act protects personal information belonging to a child younger than 13. How we collect information from users under 13, the types of information we collect, and the reasons for collecting this information are described in Sections 7, 8, and 9, respectively. We do not require users younger than 13 to disclose more information than is reasonably necessary to use the Services.

We use a handful of analytics providers in relation to all users, including users under 13, to help us improve the Services. These third-party service providers do not use your data for any purpose other than to provide the Services. You can view a list of Seesaw's third-party service providers and review their privacy policies here: <https://web.seesaw.me/subprocessor>. If you have questions about our third-party service providers, you can contact us at privacy@seesaw.me.

Information for parents or guardians on how to correct, edit, download, update, or delete data about your student can be found in Sections 17 and 18 below.

5. SEESAW AND GDPR

[Seesaw complies](#) with the GDPR and allows residents of the EU, UK, and Switzerland to exercise their rights described in that regulation. The purposes for which Seesaw collects your information, the categories and specific types of information, and our practices and policies regarding the processing of your [information are described in this Privacy Policy and our Data Processing Agreement. If you have specific questions about how Seesaw is compliant](#) with the GDPR, please see our [GDPR page](#) or contact privacy@seesaw.me.

6. WHO DOES SEESAW COLLECT INFORMATION FROM?

We collect information from individuals who create accounts on Seesaw, which includes teachers, students, and Family Members. We also collect limited log data from all visitors to our marketing website.

7. HOW DOES SEESAW OBTAIN MY INFORMATION?

We receive information from the information that you and others provide, from your device(s), and from third-party services. The categories of sources from which we've collected or received information include:

- **You:** We collect the content, communications, and other information you provide when you use Seesaw.
- **Other people:** We collect information that other people provide when they use Seesaw, such as when a teacher adds a parent's phone number to send updates about a student's work.
- **Your device(s):** We collect information from and about the computers, phones, and other web-connected devices you use with Seesaw.
- **Third-Parties:** When you create a Seesaw account using a third-party service (e.g. Google or Clever), we access the name, profile picture, and email address (if available) provided by these services.

8. WHAT INFORMATION DOES SEESAW COLLECT?

Account Information: When you create an account on Seesaw we collect your name, email address, password, and optional profile picture. Seesaw may also [collect your phone](#) number if you enter it in your Account Settings. Teachers using [Seesaw may add](#) a Family Member's email or phone number to Seesaw in order [to send messages](#) or updates about school work. We do not collect student phone numbers.

Students are not permitted to create an account by themselves but must be invited to a Seesaw class by a teacher or school administrator. Where students have permission to use Seesaw, Seesaw collects personally identifiable information that is necessary to provide the Service, including a student's name, email address, and optional profile picture. This information may be entered by a teacher or the student or populated from the student's account with a third-party sign-in service, such as their Google account.

Users can make changes to their profile, messaging preferences, and other account details in Account Settings.

Journal Content: Seesaw collects content that is added to a class or student journal. This content may include photos, audiovisual content (including from your device's camera, microphone, or photo/video library), drawings, files, notes, hyperlinks, and other ways of documenting student learning. We regularly add types of information that can be uploaded to a Journal, and these are all covered by this Policy. We also collect comments on posts in the class and student journals, including text and voice recordings. Journal Content that is uploaded by a student or teacher may be considered a student education record as defined by FERPA.

Messages: Seesaw collects all messages that are sent and received in Seesaw. Messages may include text, audio, video, photos, drawings, files, notes, hyperlinks, or other information.

Activities: Teachers may use Seesaw to create activities to use with their students. Activities may include text or voice instructions for how to complete the activity, an example of a correct response, or a template for students to edit.

Activity Author Profiles: Teachers who choose to publish their activities to the Community Activity Library or the Activity Library managed by their school or district can also create an Activity Author Profile. This includes the name and [profile picture they](#) choose to publish on their Author Profile, as well as their [school name and](#) location.

Communications: Seesaw collects any information you send to us directly, such as email, phone, or chat communications, or through your responses to our optional surveys.

Information from your Google Account or other Third-Party Sign-in Service:

Seesaw allows school administrators, teachers, Family Members, and students (after being invited by a teacher) to sign up for and log into our service using a Google or Clever Account. Teachers can also create student accounts on behalf of students in their class. When you create a Seesaw account using one of these Third-Party Services, we use the name, profile picture, and email address (if available) provided by these services. Seesaw does not share your information with these services.

Log Data: When you use Seesaw or visit our website, we receive log data such as your IP address, cookie identifiers, browser type, operating system, device information and identifiers, and your mobile carrier. In addition, we may receive or collect additional information such as the referring web page, referring search terms, pages visited, and other information about your interactions with Seesaw.

9. HOW DOES SEESAW USE THIS INFORMATION?

We use this information to:

1. Allow you to access and use the Service by verifying your identity and storing your Journal Content, Activities, and Messages.
2. Provide support to teachers, school administrators, and Family Members.

3. Provide school administrators with information about how Seesaw is performing in their school(s).
4. If you've enabled notifications, notify you about activity on and updates to your account or your student's account.
5. Research, understand, and analyze user trends to improve and develop new features for our products.
6. Promote and advertise the Services and enhancements to Seesaw relevant for teachers, schools, and families.
7. [Investigate](#), prevent, and detect activities on our service that we believe may [violate the law](#), applicable regulations, or Seesaw policies. We may, at the [request of a](#) school, investigate accounts to determine whether they comply with school policies.

You can withdraw consent for the collection of your Personal Information at any time, but you will no longer be able to use Seesaw.

10. DOES SEESAW ALLOW THIRD-PARTY ADVERTISING OR SHARE DATA FOR ADVERTISING THIRD-PARTY PRODUCTS?

No. Our business model is straightforward: we charge for optional, additional features on top of our free product and we have no interest in advertising thirdparty products or services within Seesaw. We never display third-party ads, share data for advertising or marketing third-party products or services, or allow data collection by third-party advertisers or data brokers to use for their own purposes. We also do not allow in-app purchases for student accounts.

11. IN WHAT LIMITED CIRCUMSTANCES MAY SEESAW NEED TO SHARE MY INFORMATION?

We share data with third parties in the limited circumstances detailed below:

1. We use a small number of third-party service providers in order to operate and improve Seesaw – for example, a data center operator that manages our servers or a notification service that helps us send you messages about your account. These services need access to your Personal Information in order to work (i.e. your email address is required to send you an email), but are contractually obligated to meet our strict security standards, maintain the accuracy of the data they collect, and must only use Personal Information in identifiable form for purposes of providing the Seesaw service. When these third-party services transfer the Personal Information (Personal Data, as that term is defined in the GDPR) of EU, UK, or Swiss residents, we take steps to comply with the GDPR in order to protect your data privacy and security. A list of our third-party service providers can be [found here](#).
2. We may provide school administrators with information about how Seesaw is performing in their school(s).
3. [Seesaw may](#) disclose your information to a third party to comply with [applicable laws](#) or regulations, or a valid legal request - including to meet [national security](#) or law enforcement requirements. If we are compelled to release your data, we will do our best to provide you with advance notice by email, unless we are prohibited from doing so by law.
4. Seesaw may disclose student Account Information, Journal Content, and Messages to the child's school or district upon request, including as required by FERPA.
5. By default, Activities teachers create are private to their account. Optionally, teachers may choose to publish Activities they create to the Community Activity Library or the Activity Library managed by their school or district. In these cases, the activity and the teacher's Activity Author Profile will be shared publicly (in the case of the Community Library) or with other teachers at their school or district. No student responses to Activities are ever shared in the Community Activity Library or the school or district Activity Library.
6. We may share activities published to the public Community Activity Library with teachers who we think may be interested in using them with their class.
7. We may disclose or transfer your Account Information and Journal Content in connection with the sale, merger, bankruptcy, sale of assets, or reorganization of our company. You will be notified via email or some other means as required by law of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your information (including the right to delete your information). The promises in this Privacy Policy will apply to

your data as transferred to the new entity. If Seesaw goes out of business without a successor, Seesaw will delete your information.

12. DO YOU COLLECT DATA ABOUT [BLANK]?

We've listed all the data we collect in Section 8 above ("What Information Does Seesaw Collect?"). We intentionally limit our data collection to only what we need to provide the Seesaw service for you.

13. WHO CAN VIEW CONTENT POSTED IN SEESAW?

Student work is private to the classroom by default. Users cannot view a student's [Journal Content](#) or Messages in Seesaw unless they are the teacher or school [administrator or i](#)nvited to Seesaw by the teacher or school administrator. Teachers control who can access a student's account by authorizing specific people to connect to that student's account. Teachers decide whether families can view, like, share, or comment on their student's work and whether students can view, like, and comment on classmates' work. Teachers can turn on settings that require teacher approval of student work, allowing teachers to moderate and, when necessary, remove content shared by students before it is posted. Teachers may also choose to publish some class content to a public class web page managed by Seesaw. In addition to controlling what student work is published, teachers have the option to password protect the public class web page.

Teachers also control whether or not students or Family Members can save

Seesaw content to their device or get a link to specific Journal Content. However, Seesaw cannot prevent all forms of sharing (e.g. by taking a screenshot and posting to social media), so it is important that teachers only grant access to authorized parties and discuss their policies with families.

School administrators can access all Journal Content and Messages shared in their Seesaw organization, including Messages that have been edited or deleted.

14. DO YOU WORK WITH THIRD-PARTY ANALYTICS SERVICES?

Seesaw is constantly improving, and we use aggregate data about how Seesaw is used -- for example what buttons you click on or what pages you visit -- to inform those decisions.

To help us analyze this data, we use a small number of third-party services such as Google Analytics. For more information, please visit Google's Privacy Policy. To learn more about how to opt out of Google Analytics' use of your information, please click [here](#).

15. HOW DO YOU USE COOKIES?

Cookies are small text files that we transfer to your web browser that allow us to identify your web browser and store information about your account. We use [these cookies to keep you logged into Seesaw](#), customize your Seesaw [experience](#), [understand how you use Seesaw](#), and promote Seesaw to relevant [teachers and schools](#). You can choose to remove or disable cookies via your browser settings. Please be aware that Seesaw may not work properly if you disable or decline all cookies.

16. HOW DOES SEESAW HANDLE ABANDONED ACCOUNTS?

Seesaw reserves the right to permanently delete accounts that have not been accessed by the account holder for a period of more than one year. Seesaw will permanently delete an account that has not been accessed by the account holder for more than seven years, except where we are required to keep the information for legal or compliance purposes. Prior to permanently deleting an abandoned account, Seesaw will attempt to notify the account holder by email.

17. HOW TO VIEW, CORRECT, EDIT, EXPORT, OR UPDATE YOUR PERSONAL INFORMATION

You have the right to access, correct, or download for transport to a similar service any of your Personal Information collected by Seesaw, where permitted under applicable law. If you are an administrator, teacher, or Family Member you can update the information associated with your Seesaw account directly by logging into your Seesaw account and viewing the Account Settings tab on your profile. If you are a parent or guardian and want to correct, edit, download, or update information about your child, please work directly with your

teacher or school, or you can contact us at privacy@seesaw.me.

18. ACCOUNT SUSPENSION AND TERMINATION

If you would like to delete your Seesaw account or delete your child's Seesaw account, follow [these steps](#) or contact privacy@seesaw.me. If you request that your account or any content submitted to Seesaw be deleted, Seesaw may still retain information as needed to provide customer support and prevent accidental deletion, or as required or permitted by law. If you terminate your account, all of your data will be unavailable to you immediately, but be aware that Messages and Journal Content with others in which you participated will remain available to those other users.

[If your school or district](#) has purchased Seesaw for Schools and the school or [district ends their](#) contract with Seesaw and requests deletion of accounts, we will [attempt to notify](#) impacted users by email or another method and provide the option for users to establish or maintain an account with Seesaw for the purpose of storing student-generated content.

If you are a teacher or school administrator within the US, please be aware that FERPA requires Seesaw to retain student education records once a valid request to inspect those records has been made.

19. HOW DOES SEESAW KEEP YOUR DATA SAFE?

Seesaw takes protecting your security and privacy seriously and we've put a number of measures in place to protect the integrity of your information, including the use of access-controlled data centers, routine 3rd party security audits, restricted employee access to user information, and data encryption in transit. For more information, please read this [article](#). In the event of a security breach, Seesaw will notify affected account holders within the amount of time required by law so that you can take steps to keep your data safe.

20. HOW DOES SEESAW HANDLE DATA FROM INTERNATIONAL VISITORS?

By default, any Personal Information that you provide to Seesaw may be hosted on servers located in the United States. If your school or district has purchased Seesaw for Schools, your school or district can choose to store all data associated with your Seesaw for Schools account in a different supported country. By participating in Seesaw for Schools, you consent to allow your school or district to determine where to store your data. Please contact your Seesaw for Schools administrator to find out where your data is stored.

When transferring any Personal Information outside of the EU, UK, or Switzerland, we comply with applicable laws to ensure an adequate legal basis exists for said transfer. To view our Data Processing Agreement and standard contractual clauses, please visit <https://web.seesaw.me/dpa>.

[In certain situations](#), we may be required to disclose personal data in response to [lawful requests](#) by public authorities, including to meet national security or law [enforcement](#) requirements.

Seesaw commits to resolve complaints about your privacy and our collection or use of your Personal Information transferred to the United States pursuant to the Data Processing Agreement. European Union, UK, and Swiss individuals with inquiries or complaints may first contact Seesaw by email at privacy@seesaw.me.

Seesaw has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not [satisfactorily addressed](#), please visit <https://bbbprograms.org/privacy-shieldcomplaints/> [for more information and to file a complaint](#). This service is provided free of charge to you.

Seesaw complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information

transferred from the European Union and Switzerland to the United States. Seesaw has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Seesaw is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US and the Swiss-US Privacy Shield, Seesaw is potentially liable.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

21. DOES SEESAW COMPLY WITH YOUR STATE'S LAWS?

[We sometimes get](#) asked whether Seesaw complies with specific US state laws. For more information about your state, please see [here](#).

22. RIGHTS OF CALIFORNIA AND NEVADA RESIDENTS

If you are a California resident, please see [here](#) for more information about our practices and your rights with respect to your information.

If you are a resident of Nevada, you have the right to opt-out of the sale of certain

Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at privacy@seesaw.me with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth below.

23. CONTACT INFORMATION

If you have any questions or feedback about this Privacy Policy, please contact privacy@seesaw.me. You can reach Seesaw by mail at:

Seesaw Learning, Inc.

548 Market St

PMB 98963

San Francisco, CA 94104-5401

You can reach Seesaw by phone at: (415) 870-4468

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PRIVACY POLICY - WEBSITE

Introduction

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website www.assessment360.org (hereafter known as “the Site”). Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the site.

Contact Information

Assessment360 Limited

204 Scott House

The Custard Factory

Gibb Street

Birmingham

B9 4AA

0300 234 2345

support@assessment360.org

How we Gather and use Personal Information

Assessment360 will not collect any personally-identifiable information about you (e.g. name, address, e-mail address) without you expressly agreeing to provide it to us. We may collect information about you in a variety of ways on the Site, this includes:

Cookies

Like most websites, we use cookies to help make browsing more convenient for you. For example, the next time you visit the Site, it will automatically load the page in the language you’ve previously selected by reading the information from the cookie so you don’t have to select your preferred language again.

Please see our Cookie Policy for further details.

Training Bookings

When you make a training booking through the Site we request the following personal data through the use of Microsoft Forms in order to fulfil that booking:

1. Name
2. Email address
3. School
4. Role

We do not collect any financial information through the Site

Privacy Policy 1 Last Checked 25/02/22 SB

This information is processed under the basis of Article 6(1)(b) – Contract, of the EU general data protection regulation 2016/679 (GDPR).

Security

The site has security measures in place to protect the loss, misuse and alteration of the information under our control and personal information collected by us is stored in secure operating environments that are not available to the public.

Data Retention

If your school or organisation stops working with the Assessment360, we retain your personal data for the maximum period that it is useful, unless instructed otherwise by you.

Your rights under GDPR

If you know or believe that any data we hold to perform these functions is incorrect or has changed, you have the right to request that we update it. You can also ask us at any time for details of the personal data we hold, and to update, rectify or remove it as you prefer.

We may only use the data for the purposes agreed to when the data is collected from you.

Any such request should be directed to the contact details above.

If our data security is breached, we are required to notify you within 48 hours, and notify the data authority for the England and Wales, the Information Commissioners Office (ICO). If you believe we have failed in our duty to handle your data lawfully, securely and fairly, you can report this to the ICO. However, it is advisable that you raise the issue directly with us first, so that we can rectify the issue as soon as possible, before contacting the ICO if you wish.

For any request made to us, you have a right to a response and action within one month, and without undue delay.

Wonde Privacy Notice

Privacy Policy

At Wonde, we take privacy very seriously. We have prepared this privacy notice to ensure that we communicate to you, in the clearest way possible, how we treat your personal information. We encourage you to read this privacy notice carefully.

This notice sets out how we look after your personal data if you are a:

Parent or student;

Member of staff at a school;

Visitor to our website;

Supplier or business contact of Wonde.

We may update this notice from time to time, and you can find our latest notice on our website or by asking us for a copy.

1. Who are Wonde

Wonde Limited is a company incorporated in England and Wales, with company number 08645640 (referred to as “we” “us” “our” and “Wonde” in this notice).

This privacy notice applies to personal data we collect through all of our different businesses, unless we provide a separate privacy notice for that business.

Our address is Furlong House, 2 Kings Court, Newmarket, Suffolk, England, CB8 7SG, United Kingdom.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this

privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer as follows:

Address: Furlong House, 2 Kings Court, Newmarket, Suffolk, England, CB8 7SG

Telephone Number: 01638 779 144 Email address: dpo@wonde.com

2. What does Wonde do?

We provide applications and platforms to help schools better manage and securely control their data. Our Wonde platform integrates with a school's management information systems, to allow schools to seamlessly transfer data to and from third party application providers.

We also provide applications to schools, such as our TestRegister application. In most cases, Wonde acts as a data processor. This means we assist the school and the application provided to transfer your personal data, and that of pupils, to and from each other. In these cases, the school will be the data controller and the person responsible for deciding how and when your personal data is collected and used, whilst we follow the instructions of the school. The school, and, in some circumstances, the third party application provider, will be a data controller. The school should provide you with their privacy policy or privacy notice, setting out how the school uses your personal data.

Where we act as a data processor, we have legally binding agreements in place with the school (and application provider) which restrict how we process your personal data, in accordance with data protection laws.

When you log in to our platform, visit our website, or contact Wonde support, we will receive certain data directly from you, such as your name and login details. For this limited data only, we will be the person responsible for deciding how and when your data is used, and we will be the data controller.

We are a data controller when we collect personal information from suppliers and other third parties who interact with us.

3. The purpose of this privacy notice

The purpose of the remainder of this privacy notice is to set out how we use your personal data when we act as a data controller.

This notice does not apply when we act as a data processor. In those cases, our private agreement with the school will apply, and you should read the school's privacy policy or privacy notice to understand what personal data is collected and how it is used and shared.

4. The data we collect and how we collect it

Depending on your relationship with us (for instance, whether you are a parent or a professional contact), we collect, use, store and transfer some or all of the following data:

Identity Data: your name. For pupils, we also collect year group and age information.

Financial Information: whether a pupil is entitled to school meal vouchers, and if so, the value.

Contact Data: your email address, telephone number and postal address. ● Relatives Data: the name(s) of your parent(s) and/or child or children.

Technical Data: information we collect automatically when you visit our website, including your IP address, browser details, and device details.

You can withhold your personal data from us, but we may not be able to provide our services to you if you do so.

We may collect your personal data from different sources:

We collect all of the types of data listed above directly from you when you interact with us. This includes when you register with one of our platforms, and when you login to our platforms.

We collect Identity Data, Contact Data and Relatives Data from the school(s) you are connected to.

We collect Technical Data automatically when you interact with our website or platform, by using cookies and other similar technologies.

5. How we use your personal data

We will only use your personal data when the law allows us to.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

When we are acting as a data controller, we will use your personal data for the purposes set out in the table below.

The law sets out a number of different reasons for which we can collect and use your data. The legal grounds on which we collect and use your data are also set out in the table below.

Purpose for using your data	Legal ground for using your data for this purpose
To allow you to access your account on our platform.	Necessary for our legitimate interests (to allow those with an account on our platform to use it)
To allow you to communicate with your school/the school your children are at.	Necessary for our legitimate interests (to allow staff, children and parents of our school customers to use our platform).
To provide support to you when you contact us.	Necessary for our legitimate interests (to respond to support calls as our users would expect).
To manage our relationship with you, which will include notifying you about changes to our privacy notice.	To comply with a legal obligation. Necessary for our legitimate interests (to provide important updates to our users).
Where you are a supplier, to register you as a supplier and to purchase goods or services from you.	To enter into and/or perform a contract with you. Necessary for our legitimate interests (to make purchases of goods and services).
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (to protect our business and website; to keep our services updated).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Necessary for our legitimate interests (to continuously improve our services for our customers and users).

To create anonymous aggregated data, as set out below.	Necessary for our legitimate interests (to provide additional benefits and functionality to our customers and users without disclosing personal data).
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Aggregated Data

We may aggregate and use non-personally identifiable data we have collected from you and others. This data will in no way identify you or any other individual. We may use this aggregated non-personally identifiable data to:

1. assist us to better understand how our users are using our platforms and services;
2. provide users with further information regarding the uses and benefits of our platforms and services;
3. enhance school productivity, including by creating useful school insights from that aggregated data and allowing benchmarking of performance against aggregated data; and
5. otherwise to improve our platform and services.

Cookies when using our website

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.wonde.com/cookie-notice>

6. Sharing your personal data

We may need to share your personal data when using your personal data as set out in the table above. We may share your personal data with the following third parties:

1. Our professional advisers, including lawyers, auditors and insurers.
2. Service providers who provide IT and system administration services, or who store data on our behalf.
3. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

7. International Transfers

We may transfer your personal data to third parties providing services to us who are based outside of the UK. This includes parties providing IT administration services and hosting services, and parties providing assistance with managing our marketing databases.

Whenever we transfer your personal data outside of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

transferring data to countries that have been deemed to provide an adequate level of protection for personal data; or

using specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

8. Retention period

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For more details of our specific retention periods, please contact our Data Protection Officer.

9. Your rights as a data subject

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out below. If you wish to exercise any of the rights set out below, please contact our Data Protection Officer.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Your rights are as follows:

- Right of access – you have the right to request a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- Right of rectification – you have a right to request that we correct personal data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten / erasure – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Where we are relying on your consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent, or to processing carried out on other legal grounds. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

10. Complaints to the Information Commissioner's Office

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.