

# SPAG.com Privacy Policy

This website is operated by Orchard Digital Limited (registered number 10007586). Our business operates under the trading name SPAG.com.

If you have any concerns regarding your data and privacy you can contact us at [support@spag.com](mailto:support@spag.com). When we use the terms “Company”, “we”, “us”, “our” and “ours” in this privacy policy we are referring to SPAG.com.

When we use the terms “you”, “your” and “yours” when used in this privacy policy we are referring to you the reader of this privacy policy.

## Introduction to and how this document will help you understand how we respect your and help you protect your personal data.

Your personal data and the way you and others (including here at SPAG.com) take care of that data is very important. We know that you will expect us to be committed to the security, privacy and confidentiality of information provided by you or on your behalf. We want to be sure that you are able to understand the personal data that we collect and what happens to that personal data whilst we hold or have access to the data. You will expect us to be transparent in our practices and be open with you in the unlikely event that things go wrong and something unexpected happens involving your personal data.

With your help and that of any School you may be associated with we want to make sure that the personal data that we hold is always accurate and up to date. You will be able to check back with us and ask to see your personal data held by us at any time.

So, this privacy policy describes our current policies and practices with regard to any personal information collected by us whether from you directly, through the website or, if you are a Parent, Guardian or Carer who has not subscribed directly, provided to us by a School with which we work.

Personal information means any information which identifies you, and may include information such as your name, email address, telephone number and information specifically about you (and not any other person) that we either hold or have access to.

## How we manage Data Protection compliance

We have appointed an appropriate person to oversee and to assure compliance of our business with all data protection and e-privacy rules. That person is Philip Orchard and may be contacted at [support@spag.com](mailto:support@spag.com)

## Notification of changes to our privacy policy

We are continually improving our methods of communication and adding new functionality and features to this website and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. We encourage you to check updates to this document regularly.

This policy was last updated on 20th May 2018.

We have updated this policy to recognise the responsibilities we will have under the General Data Protection Regulation and related UK data protection laws.

# Navigating through this document

To help you navigate through this document we divide it into sections:

- How we receive your personal data – the various routes by which we may find ourselves in possession of your personal data;
- We next tell you about the personal data that we collect about you;
- If you are user or about to become a user of the SPAG.com product (or thinking of becoming a user) the next section is important to you as it provides a lot of detail about the way we work with Schools and your students which necessarily involves collecting and processing your personal data;
- And then we explain how we may use that personal data;
- We've invested extensively in technology to help us meet our personal data protection duties and we explain those arrangements including where your personal data may be stored;
- We have policies that govern how long we hold personal data for and these arrangements are described next;
- We explain how you can ask for a copy of your personal data;
- We explain procedures that we have in place for keeping your personal data up to date for so long as we are entitled to hold it;
- We will help you should you wish to have all your personal data deleted under the right to be forgotten by following your instructions (unless there is any overriding legal obligation upon us that prevents us doing so);
- When we co-operate with others such as in relation to education research and curriculum development how we make sure your data is not used as personal data but is anonymised; and
- Finally, we tell you how cookies are use when you are using our websites.

## The Information we collect

We only hold personal data which is directly relevant to our dealings with you and where any processing we may subsequently undertake of that data can be carried out by us lawfully – for example in pursuance of our legitimate interests as explained within this Policy or for purposes relating to the entering into of a contract with an organisation and the subsequent provision of services under that contract. That data will be held and processed in the way we describe within this Policy.

You may have been directed to this Policy through a weblink we provided you with. We make individuals aware of our policy in relation to our holding and any processing of that person's data at the point of collection of the personal data concerned.

## How we collect personal information

We may collect your personal information at the point you make an enquiry of SPAG.com. This includes any telephone enquiry you may make and enquiries that we receive at trade fairs and in other marketing activities we conduct. Certain information may already be held by us when you make contact if you have researched our business and the SPAG.com product but until you make contact with us this will have been held on an anonymised basis

By providing us with your business card or completing any enquiry form that we offer to you we will communicate with you assuming that you are happy that we do so. Your personal details will be processed in these circumstances on the basis that it is in our legitimate interest to engage with individuals and organisations who are interested in our products and services we provide and all that we do within the education sector.

Thereafter we will only retain your personal information if we are entitled to do so based upon you having freely consented to further communication and we having informed you that you can withdraw that consent at any future time.

When you indicate that you wish to receive information from us we will accordingly only retain your information on a basis that entitles us to thereafter hold and use that personal data with an express consent provided by you to us holding the data and for each purpose that we then intend to use that data.

If you sign up for any training event or conference we also require personal information so that we can communicate with you about the event.

## Information collected in connection with registration – Educational establishments and Teachers

We will collect and process the following data about teachers (which include any staff engaged by the educational establishment) who utilise the platform in connection with registration for the Platform.

- -First Name
- -Second Name
- Contact Email address
- Office Email Address
- -School Address
- School Phone Number
- Contact Number

The information will be collected either from the person granted administrative rights on behalf of the educational establishment (if the Educational establishment has registered) or you as the individual teacher (where the individual teacher has registered). The information is collected from forms which are completed online in connection with the registration for the Platform or as a result of any correspondence with us by phone, e-mail or otherwise.

## Information collected in connection with sign-in – Students

The Platform enables the educational establishments and/or teacher to make the services on the Platform available to specific students. The students will be only be able to access the Platform if the educational establishment/teacher has provided the student with the appropriate username and password. Please refer to the education establishment's privacy policy to understand more about how the personal data captured is used in the course of the provision of education by that establishment.

The information which will be collected from students in connection with signing into the Platform will be scores generated when taking SPAG.com tests only. It is the responsibility of each Customer being the educational establishment or an individual teacher authorised by you to ensure that any student to whom they intend to provide an ID access have, before any such code is provided, obtained all necessary consents and permissions (from a parent and/or guardian and from their educational establishment) to use the Platform and for us to collect and process any user data.

As a Teacher user you acknowledge and warrant that you have and will provide all requisite authority from, and on behalf of, the student including where relevant the parent/guardian of the student and on behalf of the educational establishment to (i) allow the student to use the Platform; and (ii) for you to provide the Platform and make it available to student users and to make any user data available to us in connection with the use of the Platform on the terms set out in our terms and conditions and this privacy policy.

## Information collected in connection with day to day use of the Platform.

Information will also be collected in connection with day to day use of the Platform by Teacher Users and Student Users. This information will be collected in connection with the use of the Platform in the classroom environment, and from Teacher users participation in any competitions, promotions or surveys, and also when any problem is reported.

The information which will be collected includes assessments accessed. SPAG.com generates new personal data which is stored and made available to teaching staff who have been provided with access rights and to the student that is the subject of the assessment (but no student will see results for any other student).

## Technical information which we collect about you

We will automatically collect the following information in connection with the Teacher Users and Student Users use of the Platform:

- technical information, including your login information, the Internet protocol (IP) address; used to connect the computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information relating to your visit, including the date and time of access, the duration of your visit to the Platform, details of the Platform features which were utilised during the visit and for how long, the location from which the Platform was accessed page response times;
- download errors, page interaction information (such as scrolling, clicks, and mouse-overs);
- methods used to browse away from the page and any phone number used to call our customer service number.

In particular the Platform utilises Google Analytics a web analytics service provided by Google, Inc. Google Analytics uses cookies to help analyse and provide the technical information referred to above as being collected in connection with the use of the Platform.

Much of this information will be collected using cookies.

# Our use of your personal information

## For our marketing purposes

If you indicate now or at a future time that you consent to our doing so, we will maintain the personal information you provide us with so that we may:-

- contact you to inform you of new services and products we will be providing;
- send you requested information about our services or products; or
- contact you with updates in the further development of any products and/or services you have expressed interest in.

We consider that we may use your personal and our processing of that personal data will accordingly arise in the course of pursuing our legitimate interests as a business engaged in and committed to the success of the education sector.

Our emails provided on the basis above will always have an opt-out option in respect of further communications.

## For Purposes of entering into contracts and the management and administration of the contract

We will use the personal information we hold to note enquiries that may be raised in any way that is provided for under the contract. This includes use by users or our products or services of any helpline facility that we provide.

We will use the details of the person granted administrative rights on behalf of the educational establishment (if the Educational establishment has registered) or you as the individual teacher (where the individual teacher has registered).

For the purpose of providing services as required by our contracts with schools, their students and other customers and to continue developing and improving our products and services.

We hold information about certain persons for purposes associated with the administration of contracts that we hold with schools and other customers of our business. We will hold that information for so long as we have a contract with the organisation concerned or until we are advised of any change in the person or persons we are to work with in the administration and management of the contract in which case details of the previous individual will be deleted immediately unless we are then provided with a consent by that person to continue to communicate in relation to our products and services.

We hold a record of individuals who call any helpline services that we provide (this will include circumstances where an individual contacts us by another means but is referred to the helpdesk). We will request the following details: School postcode.

We will also have access from time to time to personal and other data that a School that is our customer is the data controller of. This data will be provided by the School either directly or via a third party that is commonly referred to as a data extractor. Please refer to the privacy policy of any school that you may be interested in to understand how it expects us to operate with them as a data processor.

## To administer events that we organise

We will use information provided at the point of registration to attend any event that we organise such as training workshops, seminars and events we organise at Trade Fairs to keep you advised of the event prior to it being held. We may also contact you afterwards to encourage you to provide us with feedback relating to the event you have attended.



## How your information is stored securely

SPAG.com has exclusive access to a secure server upon which data is stored. There are also effective data back up arrangements in place in case a data loss incident arises and we need to restore your data back into our system. The arrangements we have in place are facilitated by Strategic Software Applications Limited ("SSA") (registered number 8423947). SSA contract with a data centre approved by ourselves as detailed below.

Our data is held under the following arrangements which are sub-contracted on our behalf by SSA. The company that provides services to us is Fasthosts Internet Limited ("Fasthosts") (registered number 3656438). Fasthosts is a company expert in the provision of secure data storage facilities. More information is available here:- <https://www.fasthosts.co.uk/>

Fasthosts operate under a privacy policy that may be reviewed here:- <https://www.fasthosts.co.uk/terms/privacy-notice>

## How long do we hold your personal information?

If you make any enquiry of us that does not within a period of 30 days lead to our providing you with a proposal to provide any of our products and/or services we shall delete the information we have or (if we wish to retain information for the purposes of the further development of our products and services retain the information without any of the same constituting personal data immediately thereafter.

We hold information relating to individuals who are nominated by Schools and other customers as authorised to work with us in contract management and administration for so long as that authorisation is in place or until the contract with us comes to an end if earlier.

We will process on behalf of a School data (including personal data) where we provide data service centres for so long as we are required to do so in our contract with that party.

If you register for or attend any event that we organise or participate in and we receive your personal information relating to that, you may be invited to agree that we market to you thereafter in which case your personal information will continue to be held by us as explained earlier in this Policy. In all other cases your information will be deleted by no later than 3 months.

## Unsubscribe and Right to have Personal Data Deleted

Where you have consented to contact being made by us with you for any of the purposes mentioned above but you no longer wish to receive emails from us or wish to change your selections as to how or what our contact with you should, be please email [support@spag.com](mailto:support@spag.com).

If you choose to unsubscribe from our mailing lists we will only make contact with you again in circumstances where you have consented to our being re-provided with your information and that contact is authorised by you.

## Anonymous data collected through this website

In addition to the information we collect as described above, we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers they use. This technology does not personally identify you – it simply enables us to compile statistics about our visitors and their use of our website.

Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again this technology does not identify you personally – it simply enables us to compile statistics about the use of these hyperlinks.

# Cookies and similar technologies

In order to collect the anonymous data described in the preceding paragraph, we may use cookie technology on our website.

A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. Cookies do not damage your computer.

You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the services and features offered through our website may not function properly if your cookies are disabled.

We use two types of cookies on our website:

## Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for cannot be provided. They are deleted when you close the browser.

## Performance cookies (e.g. Google Analytics)

These cookies collect information in an anonymous form about how visitors use our website. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to continually improve the site.

We may also use your IP address to help diagnose problems with our server, to administer our website and to improve the service we offer to you. An IP address is a numeric code that identifies your computer on a network, or in this case, the internet. Your IP address might also be used to gather broad demographic information.

We may perform IP lookups to determine which domain you are coming from (i.e. aol.com, yourcompany.com) to more accurately gauge our users' demographics.

Information from these types of cookies and technologies or about website usage is not combined with information about you from any other source. None of the cookies or technologies that we use will personally identify you.

## If you wish to access any personal data we hold

You are entitled to make a request that we provide you with any personal information that we hold concerning you by making a subject access request. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form

We will also correct, amend or delete any personal information that you tell us is inaccurate and notify any third party recipients of the necessary changes. You may update any information you have given to us by contacting us at our registered address or the email address given above.

We expect Schools, under their agreement with us to ensure that personal data they provide is updated as required so as to maintain its accuracy.

## Disclosure of your personal information

We do not share, sell or distribute your personal information with unrelated third parties, except as otherwise provided for in this privacy policy and in circumstances in which you have expressly consented to the sharing and the purpose for which the sharing is to be undertaken.

We may share, transfer or disclose the information in our databases and server logs to comply with any legal requirements, or in the event of our flotation on a stock exchange, sale, merger, reorganisation, dissolution, disposal of all or part of our assets or similar event. We will inform you of any such transfer or disclosure if required by law.

## Data access and corrections

Requests to delete personal information are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.

## Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information about yourself.

## Transfer of data abroad

If you are visiting this website from a country other than the country in which our servers are located (currently United Kingdom), the various communications will necessarily result in the transfer of information across international boundaries. By visiting this website and communicating electronically with us, you consent to the processing and transfer of your personal information as set out in this privacy policy.

## The Information Commissioners Office

Please remember that the website of the Information Commissioners Office provides helpful guidance and information about our data protection laws and how they operate. The site is accessible at [www.ico.org.uk](http://www.ico.org.uk). You are entitled to raise any concerns you may have about the way we deal with your personal data by contacting ICO but we do request that you raise any concerns you may have with SPAG.com in the first instance to allow us the opportunity to clarify and/or deal with any issues.