Keeping your information safe and secure

HegartyMaths are committed to protecting the privacy of our users wherever you or your school provides us with your personal information.

We believe in being open and up front with how we use pupils and school staff personal information and have developed our Privacy Promise, a quick and simple summary explaining how we manage, share and look after your information. If you would like to know more about the we process your personal data, please read our detailed Privacy Policy.

We have also created a Pupil Privacy Promise, to educate all of our pupils on the use of their personal data (details), a copy of this can be found in the footer of the website.

For the most part at HegartyMaths, we process personal data about Pupils and School Staff on behalf of and under the written instruction of a school. Should you have any questions about this use, please contact your school directly.

We will decide how your personal data is used when you leave us an enquiry asking for information about the HegartyMaths platform and to provide you a demonstration of the service. Should you have any questions about this use, please contact our Data Protection Officer.

HegartyMaths Privacy Promise

We promise to collect, process, store and share your data safely and securely, by ensuring:

- **You’re always in control**: Your privacy will be respected at all times and we will work with your school in upholding privacy.

- **We work transparently**: We will be transparent about the data we receive and how we use that data.

- **We operate securely**: We will protect the data that you entrust to us via appropriate security measures and controls. We’ll also ensure that other businesses we work with are just as careful with your data.

- **For your benefit**: When we do process your data, we will use it to benefit all our pupils and school staff, to make your HegartyMaths experience better and to improve our products and services.
Who we are and how you can contact us

HegartyMaths is a trading name of:

**H&A Learning Limited**
Devonshire House,
60 Goswell Road,
London,
United Kingdom,
EC1M 7AD

Registered Company Number: 09577195

ICO Registration Number: ZA321481

HegartyMaths have appointed a Data Protection Officer (DPO), who can be contacted in the following ways should you have any questions about the way your data is handled:

**Email:** privacy@hegartymaths.com

**Mail:** Data Protection Officer
Suite 20-21 Winsor and Newton Building
Whitefriars Avenue
Harrow Wealdstone
London
HA3 5RN

Where we collect your personal information

We collect personal information about you in the following ways:

1. **Data you give to us:**
   a. When you sign up for information about the HegartyMaths platform or to get a trial;
   b. When you talk to us on the phone;
   c. When you use our website;
   d. When you send communications to us via email, comment section on the platform or by post;
   e. When you give us feedback.

2. **Data from your school:**
   a. When your school signs up for HegartyMaths;
   b. When your details are updated by your school.

3. **Data we collect about you**

   We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
a) **Identity data (Pupils)** – name, date of birth, gender, Unique Pupil Number and the school you attend and your school leave date
b) **Identity data (School Staff)** – name, job title and the school you work at;
c) **Contact data (School Staff)** – email address or telephone number;
d) **User Agent data** - browser type and version, operating system and device;
e) **Usage data** – information about how and when you use HegartyMaths.

We also collect, use and share aggregated data such as statistical or demographic data for limited purposes related to improving our platform. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users watching our videos and the results they have received on the related tests.

We do not collect any special categories of personal data about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**How we use your personal information**

We are only allowed to use personal information about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal information which we collect from you, how we use it, and the legal ground which we rely on when we use the personal information.

In some circumstances, we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

<table>
<thead>
<tr>
<th>What we use your personal information for</th>
<th>What personal information we collect</th>
<th>Our legal grounds for processing</th>
<th>Our legitimate interests (if applicable)</th>
</tr>
</thead>
</table>
| To maintain your profile on our Platform | ● Identity (Pupils)  
   ● Identity (School Staff)  
   ● Contact                     | ● Performance of a contract  
   ● Legitimate interests       | To provide an individual account for each user enrolled by schools |
| To deliver maths education via our platform | ● Identity (Pupils)  
   ● Identity (School Staff)  
   ● Contact                     | ● Performance of a contract  
   ● Legitimate interests       | To provide education tools and updates to those tools to all those with active profiles |
| To track pupil usage and provide statistical information on progress | ● Identity (Pupils)  
   ● Usage                        | ● Legitimate interests       | To provide accurate information to teachers about their pupils |
<table>
<thead>
<tr>
<th>Purpose</th>
<th>Identity (School Staff)</th>
<th>Contact</th>
<th>Performance of a contract</th>
<th>To recover any debts owed to us</th>
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</thead>
<tbody>
<tr>
<td>To manage payments or collect and recover money owed to us</td>
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<td>• Performance of a contract</td>
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<td></td>
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<td></td>
<td>• Legitimate interests</td>
<td></td>
</tr>
<tr>
<td>To manage our relationship with you and your school, including notifying you about changes to our terms or Privacy Notices</td>
<td>• Identity (School Staff)</td>
<td>• Contact</td>
<td>• Transaction</td>
<td>To keep our records up to date</td>
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<tr>
<td>To administer and protect our business, website and platform</td>
<td>• Transaction</td>
<td>• Technical</td>
<td>• Usage</td>
<td>Running our business, provision of administration and IT services, network security</td>
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</tr>
<tr>
<td>To use data analytics and aggregated data to improve our business, website and platform, user relationships and experiences</td>
<td>• Technical</td>
<td>• Usage</td>
<td>• Contact</td>
<td>To define users of our services, to keep our website and platform updated and relevant and to develop our business</td>
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<tr>
<td>To make contact with you regarding the product and services offered by HegartyMaths</td>
<td>• Identity (School Staff)</td>
<td>• Contact</td>
<td>• Legitimate interests</td>
<td>To demonstrate our services and sign up new schools.</td>
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<tr>
<td>To contact with you regarding your contract renewal date</td>
<td>• Identity (School Staff)</td>
<td>• Contact</td>
<td>• Legitimate interests</td>
<td>To ensure there is no interruption to your usage of the platform by renewing your contract in a timely manner.</td>
</tr>
</tbody>
</table>

**Who we share your personal information with**

If you are a member of staff at a school, we share your information with:

- **Wonde** for integration with your schools MIS;
- **Hubspot** to process enquiries about our platform and manage our relationships with our partner schools;
- **GrooveHQ** to collect and organise queries submitted by school staff who use the HegartyMaths platform;
- **Xero** to process our accounts;
- **Trello** and **Slack** to manage our workflow and projects;
- **New Relic**, **Bugsnag** and **Cloud Flare** to maintain, secure and improve our website and platform;
- **Mailchimp** to keep you up to date with any changes or maintenance to our website or platform.

If you are a pupil, your information is only shared with **Wonde** in order to create and maintain your HegartyMaths account.

If HegartyMaths is acquired by a third party, personal data held by us about our users, will be one of the transferred assets.

We’ll never make your personal data available to anyone outside HegartyMaths for them to use for marketing purposes without your prior consent.

**Third party links**

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

**Transferring your personal information outside the EEA**

In limited circumstances, we do transfer some personal data relating to school staff outside of the EEA. When personal data is transferred outside of the EEA, we must tell you where it is going and what safeguards are in place for that transmission. The organisations who receive personal data and the safeguards in place for that data are as follows:

<table>
<thead>
<tr>
<th>Name of third party</th>
<th>Service provided by third party</th>
<th>Geographical location</th>
<th>Safeguard for transferring personal data outside of the European Economic Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Google LLC</td>
<td>Document creation and storage</td>
<td>USA</td>
<td>EU/US Privacy Shield</td>
</tr>
<tr>
<td>Groove Networks, LLC</td>
<td>Web application for helpdesk support</td>
<td>USA</td>
<td>EU/US Privacy Shield</td>
</tr>
<tr>
<td>Hubspot, Inc</td>
<td>Sales CRM system</td>
<td>USA</td>
<td>EU/US Privacy Shield</td>
</tr>
</tbody>
</table>
The Rocket Science Group LLC t/a Mailchimp

Mass mailing platform

USA

EU/US Privacy Shield

Slack Technologies, Inc

Internal communication tool for HegartyMaths employees

USA

EU/US Privacy Shield

Trello, Inc

Project management tool

USA

EU/US Privacy Shield

Xero Ltd

Accounting software

New Zealand

New Zealand has an Adequacy Decision given by the European Commission; Xero enter into Standard Contractual Clauses where their processing takes place outside of New Zealand.

No data relating to pupils is transferred outside of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and where relevant will notify data controllers, you and any applicable regulator (including the ICO) of a breach where we are legally required to do so.

How long do we keep your personal information

We will keep your personal information for as long as you are an active user on HegartyMaths.

After you stop being an active user, because you have stopped regularly using our services or left the school which has enrolled you, we may keep your personal information for 24 months from the end of that academic year for one of the following reasons:

- To respond to any questions or complaints from you;
- To maintain our records;
- To provide the information should your HegartyMaths account be reactivated;
- To comply with laws applicable to us.

After such time, we will securely delete your personal information.
If we receive a bounceback from any of the emails that we send to you on a number of occasions, we may delete your personal information in relation to those emails at our discretion.

**Marketing**

We may use the personal information of a specific member of school staff to tell you about your contract renewal date.

This is the only processing undertaken which would be considered as a direct marketing communication under the Privacy and Electronic Regulations (2003).

**Your rights**

You have the following rights with regard to your personal data:

- **The right to be informed** – this privacy notice explains to you how your personal data is processed by us.

- **The right of access** – you can request that we provide you with a copy of all of the personal data that we hold about you.

- **The right to rectification** – please let us know if any of the information we hold about you is incorrect so that we can correct it.

- **The right to erasure** – you have the right to have your data ‘erased’ in the following situations:
  - where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed;
  - when the personal data was unlawfully processed;
  - when the personal data has to be erased in order to comply with a legal obligation.

  We will erase your records only where one of the above situations apply.

- **The right to restrict processing** – you have the right to restrict processing in certain situations such as:
  - where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
  - when processing is unlawful, and you oppose erasure and request restriction instead;
  - where we no longer need the personal data, but you require the data to establish, exercise or defend a legal claim.

- **The right to object** - you have the right to object to the processing of your personal data in the following circumstances:
  - Where the processing is based on legitimate interests; and
  - Processing for purposes of scientific/historical research and statistics.

If you are a pupil, you will have to make these requests to your school.
Making a complaint

Please let us know if you are unhappy with how we have used your personal information by contacting the Data Protection Officer.

You also have a right to complain to the Information Commissioner’s Office. You can find their contact details at www.ico.org.uk. We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.