

## Bruce & Butler: General Privacy Policy (GDPR)

HegartyMaths

Last modified: [16<sup>th</sup> May 2018]



### 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 how 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 [here](#).

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.

#### 1. Who we are and how you can contact us

"HegartyMaths (referred to in this policy as "we", "us" or "our") is a trading name of:

**H&A Learning Limited**

## **Bruce & Butler: General Privacy Policy (GDPR)**

### **HegartyMaths**

**Last modified: [16<sup>th</sup> May 2018]**

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 or feedback about the way your data is handled:

Email: [privacy@hegartymaths.co.uk](mailto:privacy@hegartymaths.co.uk)

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

## **2. Where we collect your personal information from**

We may collect personal information about you in the following ways:

### **Data you give to us:**

- When you sign up for information about the HegartyMaths platform or to get a trial
- When you talk to us on the phone
- When you use our website;
- When you send communications to us via email, comment section on the platform or by post;
- When you give us feedback.

### **Data from your school:**

- When your school signs up for HegartyMaths
- 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:

- **Identity data (Pupils)** – name, date of birth, gender, Unique Pupil Number and the school you attend and your school leave date
- **Identity data (School Staff)** – name, job title and the school you work at

## Bruce & Butler: General Privacy Policy (GDPR)

HegartyMaths

Last modified: [16<sup>th</sup> May 2018]

- **Contact data (School Staff)** – email address or telephone number.
- **User Agent data** - browser type and version, operating system and device.
- **Usage data** – information about how and when you use our Platform

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.

#### 4. 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 on which we rely 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.

<b>What we use your personal information for</b>	<b>What personal information we collect</b>	<b>Our legal grounds for processing</b>	<b>Our legitimate interests (if applicable)</b>
To maintain your profile on our Platform	<ul style="list-style-type: none"><li>• Identity (Pupils)</li><li>• Identity (School Staff)</li><li>• Contact</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	To provide an individual account for each user enrolled by schools
To deliver maths education via our platform	<ul style="list-style-type: none"><li>• Identity (Pupils)</li><li>• Identity (School Staff)</li><li>• Contact</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	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	<ul style="list-style-type: none"><li>• Identity (Pupils)</li><li>• Usage</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	To provide accurate information to teachers about their pupils

## Bruce & Butler: General Privacy Policy (GDPR)

### HegartyMaths

Last modified: [16<sup>th</sup> May 2018]

To manage payments or collect and recover money owed to us	<ul style="list-style-type: none"><li>• Identity (School Staff)</li><li>• Contact</li></ul>	<ul style="list-style-type: none"><li>• Performance of a contract with you</li><li>• Legitimate interests</li></ul>	To recover any debts owed to us
To manage our relationship with you and your school, including notifying you about changes to our terms or privacy notices	<ul style="list-style-type: none"><li>• Identity (School Staff)</li><li>• Contact</li><li>• Transaction</li></ul>	<ul style="list-style-type: none"><li>• Performance of a contract with you</li><li>• Necessary to comply with a legal obligation</li><li>• Legitimate interests</li></ul>	To keep our records up to date
To administer and protect our business, website and platform	<ul style="list-style-type: none"><li>• Transaction</li><li>• Technical</li><li>• Usage</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	Running our business, provision of administration and IT services, network security
To use data analytics and aggregated data to improve our business, website and platform, user relationships and experiences	<ul style="list-style-type: none"><li>• Technical</li><li>• Usage</li><li>• Contact</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	To define users of our services, to keep our website and platform updated and relevant and to develop our business
To make contact with you regarding the product and services offered by HegartyMaths	<ul style="list-style-type: none"><li>• Identity (School Staff)</li><li>• Contact</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	To demonstrate our services and sign up new schools.
To contact with you regarding your contract renewal date	<ul style="list-style-type: none"><li>• Identity (School Staff)</li><li>• Contact</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interests</li></ul>	To ensure there is no interruption to your usage of the platform by renewing your contract in a timely manner.

## 5. Who we share your personal information with

In order to provide you with our services and meet our legal obligations, we share limited personal data about school staff with 3rd parties, in the following circumstances:

- Wonde for integration with your schools MIS;
- Hubspot to process enquiries about our platform and manage our relationships with our partner schools;
- 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 School Staff up to date with any changes or maintenance to our website or platform;

## **Bruce & Butler: General Privacy Policy (GDPR)**

### **HegartyMaths**

**Last modified: [16<sup>th</sup> May 2018]**

- To meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations; and
- If HegartyMaths is acquired by a third party, in which case personal data held by it, about its 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.

#### **6. 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.

#### **7. Transferring your personal information outside the EEA**

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal information outside the EEA we have to tell you.

We do not transfer Pupils data outside of 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:

- Xero
  - New Zealand -
  - Adequacy Decision pursuant to European Commission Decision 2013/65/EU. & European Commission's Standard Contractual Clauses.
  - More information can be found here: <https://www.xero.com/uk/campaigns/xero-and-gdpr/>.
- HubSpot
  - EU/US Privacy Shield
- Slack Technologies
  - EU/US Privacy Shield
- Trello, Inc
  - EU/US Privacy Shield
- Mailchimp
  - EU/US Privacy Shield

More information about those organisations who have self-certified under the EU/US Privacy Shield can be found here: <https://www.privacyshield.gov.>

#### **8. 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

## **Bruce & Butler: General Privacy Policy (GDPR)**

### **HegartyMaths**

**Last modified: [16<sup>th</sup> May 2018]**

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.

#### **9. 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 you re-join the school you previously left;
- To comply with laws applicable to us.

After such time, we will securely anonymise 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.

#### **10. 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).

#### **11. Your rights**

You have certain rights which are set out in the law relating to your personal information. The most important rights are set out below.

##### Getting a copy of the information we hold

If you would like a copy of the personal information which we hold about you, you will for the most part, need to contact your school to request the information from them. In very limited circumstances you can request a copy of the information we hold about you by writing to the Data Protection Officer (in Section 1). This is known as a data subject access request.

## **Bruce & Butler: General Privacy Policy (GDPR)**

### **HegartyMaths**

**Last modified: [16<sup>th</sup> May 2018]**

You will not have to pay a fee to access your personal data, unless we believe that your request is clearly unfounded, repetitive or excessive. In such circumstances we can charge a reasonable fee or refuse to comply with your request.

We will respond to all requests within one month with an answer and where relevant will provide access to any personal data held within that time frame.

#### Telling us if information we hold is incorrect

You have the right to question any information we hold about you that you think is wrong or incomplete. You will for the most part, need to contact your school to request the correction of information from them. In very limited circumstances you can request the correction of the information we hold about you by writing to the Data Protection Officer and we will take reasonable steps to check its accuracy and, if necessary, correct it.

#### Telling us if you want us to stop using your personal information

You have the right to:

- Object to our use of your personal information (known as the right to object); or
- Ask us to delete the personal information (known as the right to erasure); or
- Request the restriction of processing.

There may be legal reasons why we need to keep or use your data, which we will tell you if you exercise one of the above rights.

You will for the most part, need to contact your school should you wish to object, erase or restrict the processing of information from them. In very limited circumstances you can object or request the erasure or restriction of the information we hold about you by writing to the Data Protection Officer and we will take reasonable steps to carry this out where relevant.

#### Request a transfer of data

You may ask us to transfer your personal information to a third party. You will for the most part, need to contact your school to should you wish to port your information from them to another school. In very limited circumstances you can request we port the information we hold about you by writing to the Data Protection Officer and we will take reasonable steps to carry this out where relevant.

## **12. 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 (details can be found in section 1).

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at [www.ico.org.uk](http://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.