

# Privacy Policy

This website is operated by Century-Tech Limited (registered number 08482934) ("Century"). If you have any concerns regarding your data and privacy you can contact us at [info@century.tech](mailto:info@century.tech).

When we use the terms "Company", "we", "us", "our" and "ours" in this privacy policy we are referring to Century.

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 Century) 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, provided to us by a School with which we work.

## **What do we mean by "Personal Data"?**

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. Some data falls into a category known as Special Category Data where usually the processing of that data can only be undertaken with your express consent.

## **What is Special Category Personal Data?**

Special Category Data is information relating to you as a person that identifies particular characteristics and where your privacy deserves special protection. Information relating to the ethnicity, your health, religious beliefs, trade union membership and political affiliations are examples of this kind of data.

## **Our Privacy Policy**

**To help you navigate through this document we divide it into sections that are organised as follows:**

*We tell you first how we, at Century, manage data protection; We advise you that this policy may be updated from time to time; We next tell you about the Personal Data that we collect about you; How we receive your Personal Data – the various routes by which we may find ourselves in possession of your Personal Data can be found here; If you are user or about to become a user of the Century 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 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'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 explain in the next section for how long we retain Personal Data in various circumstances 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; We then tell you how cookies are applied when you*

*are using our website;. We provide some important information about any links to other websites you may find and access on our website; If you access our website from overseas this section is relevant to you; You have various rights under Data Protection Legislation where we are expected to and we will assist you. We summarise your rights here; Finally we help you understand how to raise issues of concern with you and provide you with contact details for the Information Commissioner's Office;*

## **How we manage Data Protection compliance**

Having regard to our responsibilities to comply with the General Data Protection Regulation and other applicable laws, 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 Gareth Parker and may be contacted at [info@century.tech](mailto:info@century.tech).

## **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 this page regularly. This policy was last updated on 7 March 2022.

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

## **The Personal Data 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 you or an organisation (such as a School) 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 Data**

We may collect your Personal Data at the point you make an enquiry of Century. This includes any information you provide through our website, 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 Century product but until you make contact with us 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. We will invite you to consent to our retaining your information and the consent you can provide may be withdrawn at any time by contacting: [info@century.tech](mailto:info@century.tech). Your personal details will initially 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 Century-Tech our products and services and what 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 or you agreeing to pilot or take a subscription to the Century Learning Platform or any other product or service that we offer.

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 (possibly including dietary requirements) so that we can communicate with you and prepare for your involvement in the event.

## **More about Information Collected to enable use of Century**

### ***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.

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 within the Platform or as a result of any correspondence with us by phone, email or otherwise.

The information which may be collected includes your name, e-mail address, password, educational establishment name and location details, together with other optional information such as a contact number and date of birth.

### ***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 based on the subscription agreement. The students will only be able to access the Platform if the educational establishment/teacher has provided the student with the appropriate login or ID access code and the student may be required to enter his name, username, password and date of birth. 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 username and password 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 with a login or an ID access code (including, without limitation, students under the age of 13) have, before any such login or code is provided, obtained all necessary consents and permissions (from a parent and/or guardian) to use the Platform and for us to collect and process any user data.

You are also reminded that upon a student attaining the age of 13 there is a legal requirement to retake consent directly from the student and we require the relevant School to secure that consent.

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) for you to provide the Platform and make it available to student users; (ii) allow the student to use the Platform and (iii) 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 be collected in connection with day to day use of the Platform if the user chooses to share such information.

### ***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 user device;
- 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 mouseovers);
- methods used to browse away from the page and any phone number used to call our customer service number.

In particular the Platform utilises both Google Analytics and Mixpanel, web analytics services provided by Google, Inc and Mixpanel, Inc, respectively. Google

Analytics and Mixpanel use 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. For details of cookies and their use in connection with the Platform please see our Cookies Policy.

### ***Information collected in connection with registration – Century Tech Platform for Parents***

We will collect and process the following data about subscribers to products and services we offer in connection with that person's registration on the Platform. The information will be collected from the person subscribing at the point of registration. The information which may be collected includes your name, e-mail address, password, any relevant educational establishment name and location details. We will also need to receive from you and hold security related information such as a contact number and date of birth in order that we can validate further interactions with you.

### ***Information collected in connection with sign-in - The Subscriber***

You will be requested to confirm the identity of pupils or students who are users of the Platform ("Century Users") and who are to be associated with your registration. You are responsible for ensuring that the individuals you identify are aware that you are creating the registration and that where the individual is 13 years or older in the process of registering you warrant that you hold the consent of that individual to provide the relevant information. Where the child is under 13 years of age you warrant that in providing any consent you are a parent or carer of that individual and are accordingly entitled to exercise the required consent.

## **Our use of your Personal Data**

### **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.

Where you are a school, college or other institution will hold details of your Data Protection Officer or if you do not have one the individual you have identified as responsible for data protection matters.

### **For the purpose of providing services as required by our contracts with schools, their students and other customers (including Parents and Carers) 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 or individual concerned or until in the case of a school, college or other institution 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.



In the case of any individual subscribing to a product or service we provide we will hold information about certain the subscriber for purposes associated with the administration of contracts that we hold with that person.

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 name, education establishment name and email address.

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 the School 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.

## **Keeping your Personal Data up to Date**

Where we keep in touch with you to give you information about Century and our services we ask you from time to time to check the Personal Data that we hold and we will be glad to up date that in accordance with your wishes. For students and staff involved with the Century Learning Platform our agreement with the School requires the School to provide us with information concerning Staff and Users when any of that information changes (such as a new Student to be provided with access to the Platform or a change in identity of a member of staff).

## **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 us at the address given in section 1 with "Email Unsubscribe" in the subject heading. We will act upon this as soon as practicable.

You may also wish to write to us at the address given in at the beginning of this Policy. 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.

## **How your information is stored securely**

Century has exclusive access to a secure service 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.

Our data centre facility is provided under subcontract. We facilitate the transfer of data to Amazon Web Services ("Amazon") Amazon is a company expert in the provision of secure data storage facilities. More information is available here:

<https://aws.amazon.com/privacy/>.

## **How long do we hold your Personal Data?**

If you make any enquiry of us that does not within a period of 30 days leads 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 certain information for the purposes of the further development of our products and services) retain certain information but in a fully anonymised format.

We hold information relating to individuals who are nominated by Schools and other Customers including individual subscribers as authorised to work with us in contract management and administration for so long as that authorisation is in place or until the contract us 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 as explained earlier in this Policy. In all other cases your information will be deleted by no later than 60 days

## **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.

## **Consent**

To comply with current legislation, we need to ask for your consent to set the performance cookies described above. When you arrive on our website a banner appears asking for your consent to place performance cookies on your device. By continuing to use our website or by clicking 'OK', we assume that you consent to cookies being placed on your device. If you do not agree please leave our website immediately. Once your consent has been provided, this message will not appear again when you revisit. If you, or another user of your computer, wish to withdraw your consent at any time, you can do so by altering your browser settings.

## **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 currently located (in the United Kingdom and the Republic of Ireland) 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.

## Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the following rights:

The right to request access to your personal data; The right to request correction of your personal data; The right to request erasure of your personal data; The right to object to processing of your personal data; The right to request restriction of processing your personal data; The right to request the transfer of your personal data; The right to withdraw consent.

You can find out more about your rights at the Information Commissioner's Office website: [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise any of the rights set out above, please contact us via Gareth Parker at [info@century.tech](mailto:info@century.tech). You will not have to pay a fee to access your personal data (or to exercise any of your 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. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within

one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## If you wish to complain

If you have any concerns about the way Century-Tech handles your Personal Data please do contact us at [info@century.tech](mailto:info@century.tech). We will take any concerns you have seriously. In the alternative you are entitled to contact the Information Commissioners Office and we provide the contact details below:

<https://ico.org.uk/concerns/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow Cheshire

SK9 5AF Tel: 0303

123 1113

## Further Information

Our VAT number is 209 5036 23.