

CENTURY-TECH

PRIVACY NOTICE

This version is effective from: 1st May 2024

This Privacy Notice (“**Privacy Notice**”) sets out how Century-Tech Limited (“**Century**”) processes personal data in connection with our Century-Tech business, including the provision of our website at <https://www.century.tech/> (“**Site**” or “**Platform**”) and the services we offer, including through our Platform (our “**Services**”).

The Privacy Notice applies whether you are using the Service (i) via your school or other organisation (for example as a teacher or student, or sometimes as a parent/guardian), or whether (ii) you sign up directly with us and have your own subscription and account (for example as a parent or child, or a tutor). However, different parts of the Privacy Policy apply in different ways to these two scenarios. **This will be explained further below especially in section 2 and section 8.**

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data.

1 PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have received or obtained about you from a third party, and the purposes for which we process your personal data and how we share it with others. This Privacy Notice also sets out your rights in respect of our processing of your personal data.

When we talk about “**personal data**”, we mean any information which relates to an identified or identifiable living individual, such as their name, address, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them.

This Privacy Notice is intended to assist you in making informed decisions when using our Platform and our Services. Please take a moment to read and understand it. It should be read in conjunction with the relevant Century contract with your school or other organisation (if you are accessing through their account), or in conjunction with our Terms and Conditions and our Cookie Policy

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control, or you purchase goods or services from those third parties).

2 ABOUT US AND OUR ROLE

The Platform and our Services are made available by **CENTURY-TECH LIMITED** (known as “**Century-Tech**”, “**Century**”, “**we**”, “**us**”, “**our**”). **CENTURY-TECH LIMITED** is an English company (No: 08482934) with its registered office at 2 Printer's Yard, 90a The Broadway, London, England, SW19 1RD.

If you are accessing and using the Service via your school or other organisation (for example as a teacher or student, or sometimes parents), that organisation to which you are affiliated is the relevant Data Controller (and you should review their privacy notices), and Century is their Data Processor. In this situation we only have access to and use your Personal Data under the relevant Data Controller's instruction and to fulfil our contract with that organisation, i.e. to provide you with access to the Services they have contracted us to provide. We have no independent rights in your Personal Data.

If you sign up directly with us and have your own subscription and account (for example as a parent or child, or a tutor), Century is the Data Controller, and we have broader permissions (and obligations) in relation to your Personal Data, as detailed below.

Different parts of the Privacy Policy apply in different ways to these two scenarios. This will be explained further below.

3 HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights as a data subject set out in this Privacy Notice, you can contact us using the following methods:

On Site	Contact us via https://www.century.tech/contact-us/
Email	Send us an email at: info@century.tech
Post	Write to us at: 15 Alfred Place, London, WC1E 7EB

4 WHO WE COLLECT OR ARE PROVIDED WITH PERSONAL DATA ABOUT

We collect, receive and process personal data about the following people:

Site Visitors	If you browse our Site and / or register with us in any way, we will collect and process your personal data in connection with your interaction with us and our Platform.
Teachers / Staff at educational establishments, and Parents / Guardians if they use that account	If your organisation buys or uses our Services for its students, and you have responsibility for placing orders and/or administering your organisation’s account, or otherwise use that service via the organisation’s account, we will receive and process your (and the students’) personal data in connection with your organisation’s relationship with us.
Parents / Guardians / Tutors	If you subscribe directly to use our Services, including on behalf of a student, and you have responsibility for administering your account with us, we will collect and process your, and your students’, personal data in connection with your and the student’s subscription relationship with us.
Students	If your educational establishment buys or uses our Services and / or creates an account or login for you, we will receive and process your personal data in connection with their and your relationship with us.
Children	If your parent / guardian or tutor, buys or uses our Services and / or creates an account or login for you, we will receive and process your personal data in connection with their and your relationship with us.
Customers	If you otherwise purchase our Services, we may collect and process your personal data in connection with the supply of goods or services to you.
Enquiries	If you contact us with an enquiry through our Platform, submit a complaint or provide any feedback to us in our surveys and feedback forms, we will collect and process your personal data in connection with your interaction with us.
Event Attendees	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or other document relating to the event.

5 RESPONSIBILITY FOR STUDENTS’ / CHILDREN’S DATA

The Platform enables educational establishments and/or parents and guardians (and tutors) to make the services on the Platform available to students / children via their subscription agreement. The students / children will only be able to access the Platform if the educational establishment or parent/guardian or tutor has provided the student / children with the appropriate login or ID access code.

The educational establishment/teacher or parent/guardian or tutor will need to provide the following data on behalf of the students / children: Identity Data and Registration Data (see below for what this means). Additional information which will be collected from students / children in connection with signing into the Platform will be username and password only, or they may log in via Microsoft or Google accounts etc.

Students should refer to their education establishment's privacy policy to understand more about how the personal data provided or captured in relation to the Services is used in the course of the provision of education by that establishment, and also see Section 9 below about “Sharing Personal Data”.

It is the responsibility of each educational establishment and/or teacher or tutor to ensure that in relation to any students to whom they intend to provide a login or an ID access code (including, without limitation, students under the age of 13), they have been provided with all necessary consents and permissions (including from a parent and/or guardian) to use the Platform and for Century to receive, collect and process any personal data. The educational establishment and/or teacher and/or the parents and guardians or tutors, acknowledge and warrant that they have and will provide all requisite authority from, and on behalf of, the student / child including where relevant the parent/guardian of the student.

When a student / child reaches the age of 13 there is a legal requirement to retake consent directly from the student / child and Century relies on the relevant educational establishment and/or the parents and guardians or tutors to secure that consent.

6 WHAT PERSONAL DATA WE COLLECT OR RECEIVE

The types of personal data we collect or receive and process depends on who you are and how you use our Platform and Services and may include the following:

* the detail about to whom this applies is only detailed here with regard to Teachers / Staff; Parents / Guardians or Tutors; Students / Children. Other details will depend case by case.

		Applies to:
Identity Data	First name; last name.	Teachers / Staff; Parents / Guardians / Tutors; Students / Children.
Contact Data	Address; email address; telephone number.	Teachers / Staff; Parents / Guardians/ Tutors.
Registration Data	First name; last name; gender; country; nationality; username; educational establishment; any other personal data that may be provided when registering.	Teachers / Staff; Parents / Guardians / Tutors; Students / Children.
Financial Data	Bank account details; payment card details.	Parents / Guardians / Tutors. (If you have subscribed for your own account).
Transaction Data	Details about payments made; details of products purchased.	Parents / Guardians / Tutors. (If you have subscribed for your own account).
Profile Data	Account username; password; profile picture or avatar; purchase/order details; interests and preferences; contact preferences.	Teachers / Staff; Parents / Guardians / Tutors; Students / Children.
Behavioural Data	Data relating to your browsing activity or interaction with the Platform, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any products you viewed or purchased through the Platform.	Teachers / Staff; Parents / Guardians/ Tutors; Students / Children.
Technical Data	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.	Teachers / Staff; Parents / Guardians / Tutors; Students / Children.
Marketing and Communications Data	Marketing preferences; service communication preferences.	Teachers / Staff; Parents / Guardians / Tutors.

Please note that we receive and process data about ethnicity - if you have consented. Century relies on the relevant educational establishment and/or the parents and guardians or tutors to secure that consent. Consent can be withdrawn at any time by notifying us.

Otherwise, will not process any special (or sensitive) categories of personal data (relating to race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, genetics, biometrics, health, sex life, sexual orientation) or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.

7 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

* the details about whom this applies is only specified here with regard to Teachers / Staff; Parents / Guardians or Tutors; Students / Children. Other details will depend case by case.

		Applies to:
Personal data you provide to us	You may give us your personal data directly, for example, when you register or purchase on our Platform, contact us with enquiries, complete forms on our Platform, subscribe to receive our marketing communications or provide feedback to us.	Teachers / Staff Parents / Guardians / Tutors
Personal data others provide to us about you	Other people or organisations may give us your personal data directly, for example, when they register you on our Platform, contact us with enquiries, complete forms on our Platform.	Students / Children Parents / Guardians / Teachers / Staff (if you access through an organisation's account)
Personal data we collect using cookies and other similar technologies	When you access and use our Platform, we will collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the " Insight, analysis and retargeting through Cookies " section below).	Teachers / Staff Parents / Guardians / Tutors Students / Children
Personal data received from third parties	We may receive personal data about you from third parties. Such third parties may include analytics providers, data brokers, third party directories and third parties that provide technical services to us so that we can provide our Platform and our Services.	Teachers / Staff Parents / Guardians / Tutors
Publicly available personal data	From time to time, we may collect personal data about you (Identity Data, Contact Data or Profile Data) that is contained in publicly available sources (including open-source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).	Teachers / Staff / Tutors

8 HOW WE USE YOUR PERSONAL DATA

We use personal data for the purposes as set out in this section. This use by us will depend on whether we are using your Personal Data only under the instruction of your educational establishment (we act as their Data Processor) – usually relating to teachers and students (and sometimes parents/guardians); or whether you have signed up and subscribed directly (therefore we are the Data Controller) – usually parents/guardians and their children, or tutors.

Use of our Platform.

	Types of data used

<p>When an account is created on our Platform.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>You will be required to have or be associated with an account in order to use the Platform. We will use your identity/contact/registration etc data in order to set up your account or associate you with your educational establishment/school's or parent/guardian's or tutor's account.</p> <p>Once the account is set up / associated for you, we will process your data to identify you when you log in to the account and access secure areas of our Platform. We will also process the data so that we can administer the account and contact you about the account.</p> <p>We will also collect and process behavioural/technical data when you use certain features and functionality on our Platform. This data helps us understand how you use our Platform so that we can improve it.</p> <p>Our legal basis for processing</p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to the Platform and our Services in a secure and effective way and so that we can make improvements to our Platform.</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Registration Data</p> <p>Profile Data</p> <p>Behavioural Data</p> <p>Technical Data</p>
<p>If you purchase Services or other items via our Platform.</p> <p>This applies to Parents/Guardians or Tutors.</p>	<p>We collect and maintain personal data that you submit to us for the purpose of supplying Services or other items that you have requested via our Platform.</p> <p>We process this information so that we can fulfil the supply of Services, process any returns, maintain our user databases and to keep a record of how our Services are being used.</p> <p>Our legal basis for processing</p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Services, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide our Services in an effective, safe and efficient way.</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Registration Data</p> <p>Profile Data</p> <p>Financial Data</p> <p>Transaction Data</p>
<p>When you browse our Platform / website.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>When you browse our Platform, we collect and process personal data to help us understand how you are using and navigating our Platform. We do this so that we can better understand which parts of our Platform are more or less popular and improve the structure and navigation of our Platform.</p> <p>Our legal basis for processing</p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Services, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Platform in a secure and effective way and so that we can make improvements to our Platform.</p>	<p>Behavioural Data</p> <p>Technical Data</p>
<p>If you use any interactive / chat / messaging features on our Platform.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors;</p>	<p>We will collect and use personal data about you when you use certain features on our Platform. For example, depending on the nature of your interaction, we may process your when you use the Enquiry Form or Chat function to get in touch with us.</p> <p>Our legal basis for processing</p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Services, or it is in our legitimate interest to use personal data in such a way to ensure that we can respond to your enquiries, provide access to</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Registration Data</p> <p>Profile Data</p> <p>Behavioural Data</p> <p>Technical Data</p>

Students/Children.	our Platform in a secure and effective way and make improvements to our Platform.	
<p>If you contribute to our Platform or post content or comments on our Platform.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>If you submit any content to us, including via our Platform, we may process any personal data comprised within that content for the purposes of making available particular the Services via our Platform.</p> <p>Our legal basis for processing</p> <p>Where we use your content in connection with Services that we provide via our Platform, it is in our legitimate interest to use any personal data that you provide to us to ensure that we provide the relevant Services in an effective way.</p>	<p>Identity Data</p> <p>Contact Data</p>
<p>If you log in with or otherwise link to social media sites and interact with our social media pages.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>If you log in with or click on one of the social media links on our Platform or otherwise interact with our social media pages such as on LinkedIn or Twitter (including interacting with any 'like' or similar embedded features on our Platform or social media accounts), we and the relevant social media platform may receive information relating to such interaction and may share your personal data in connection with this purpose, such as certain Behavioural Data and Technical Data. For more information about how we use this personal data, please see the "Insight, analysis and retargeting through Cookies" section below.</p> <p>The relevant social media platform may also be a controller in respect of the personal data that is collected via your use of our social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy policy of the relevant social media platform.</p> <p>Our legal basis for processing</p> <p>It is in our legitimate interest to use personal data in the ways described above to ensure that we provide the Platform in an effective way and to promote our Platform via social media.</p>	<p>Behavioural Data</p> <p>Technical Data</p>

Customer service, enquiries.

<p>If you have a general question or need help with any issue concerning our Services.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>If you make an enquiry or have a technical issue, we will collect and process your personal data that is relevant to your enquiry, and to help us diagnose the technical issues you are experiencing.</p> <p>Our legal basis for processing</p> <p>It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our customer services.</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p> <p>Transaction Data</p> <p>Behavioural Data</p> <p>Technical Data</p>
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Surveys and feedback.

<p>If you complete our surveys or provide feedback on your experience of our</p>	<p>From time to time, we will invite you to provide feedback about us, our Platform and our Services in the form of online surveys, interviews or focus group sessions. We will collect and process your personal data</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p>
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<p>Platform and/or our Services.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>including as you choose to volunteer in your survey response or other feedback.</p> <p>We use this information to help us to monitor and improve our Services, to assist with the selection of future product and service lines and to train our personnel.</p> <p>Our legal basis for processing</p> <p>It is in our legitimate interest to use the personal data provided by you so that we can improve our Platform and our Services and provide them in an effective way.</p>	<p>Transaction Data</p>
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Prize draws, prize competitions and other promotions.

<p>If you participate in one of our promotions.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>From time to time, we may run prize draws, prize competitions and other promotions on our Platform and/or on our social media accounts. For the purposes of administering such promotions, we may process your personal data including as volunteered by you in relation to your promotion entry.</p> <p>Our promotions are subject to separate terms and conditions, which you may be required to accept as a condition of entry.</p> <p>Our legal basis for processing</p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (e.g., the promotion terms and conditions) or it is in our legitimate interest to use your personal data to enable us to administer our promotion fairly and effectively and to ensure that we comply with self-regulatory codes governing the operation of promotions.</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Registration Data</p> <p>Transaction Data</p> <p>Profile Data</p> <p>Behavioural Data</p> <p>Technical Data</p>
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Hosting and managing events.

<p>If you sign up for and/or attend one of our events.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>From time to time, we may organise and host events for the purpose of promoting our business or other reasons. We may process your personal data to communicate with you about such events where you have specifically requested information about such events or where we have another lawful basis for sending that information to you.</p> <p>If you attend one of our events, we may use your personal data to record your attendance at the event and for related record-keeping purposes.</p> <p>Our legal basis for processing</p> <p>It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to attend an event, or it is in our legitimate interest or a third party’s legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p>
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Insight, analysis and retargeting through Cookies.

<p>We use cookies to help us understand more about you and your use of our</p>	<p>We and our third-party partners use cookies, web beacons, pixel tags and other similar technologies (which we generically refer to as “Cookies”) to collect data from the devices that you use to access our Platform and Services. The data that is collected includes Behavioural Data and</p>	<p>Behavioural Data</p> <p>Technical Data</p> <p>Profile Data</p>
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<p>Platform and our Services.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>Technical Data, and certain Profile Data. Please see our Cookie Policy for further information, including details of our third-party partners.</p> <p>We and our third-party partners use this data to analyse how you use our Platform and our Services and the effectiveness of our Platform and our Services, including:</p> <ul style="list-style-type: none"> • for the purposes described in the “If we advertise to you on social media and other platforms”, and the “If we advertise to other people who share similar interests and characteristics to you” sections below; • to analyse how you use, and the effectiveness of, our Platform and our Services; • to count users who have visited our Platform and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Platform and our Services; • to measure the effectiveness of our content; • to learn what parts of our Platform are most attractive to our users; • to help us understand the type of marketing content that is most likely to appeal to our visitors and customers; and • to help us with the selection of future product and service lines, design and to remember your preferences. <p>Our legal basis for processing</p> <p>Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our Cookie Policy for further details.</p> <p>In certain circumstances, we may rely on another lawful basis when we use your personal data collected via the use of cookies. For example, where we use personal data collected through the use of analytics cookies to analyse how you use our Platform, it is in our legitimate interest to use your personal data in such a way to improve our Platform and our Services.</p>	
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Advertising and marketing activities.

<p>If we send you marketing communications by post and/or email/SMS</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications.</p> <p>Our marketing communications will include personalised and non-personalised marketing. Personalised marketing has been specifically tailored to you and will include content that we think is most relevant to you, based on what we know about you. Non-personalised marketing is marketing that is not tailored to you.</p> <p>Where we are sending you personalised marketing, we may also use Profile Data, Transaction Data and Behavioural Data to help us decide what sort of personalised marketing to send you (please see the “Insight, analysis and retargeting through Cookies” section above for more details).</p> <p>Our legal basis for processing</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Marketing/Communications Data</p> <p>Profile Data</p> <p>Transaction Data</p> <p>Behavioural Data</p>
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	<p>It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you.</p> <p>It is in our legitimate interest to use your personal data to send our marketing to you by post.</p> <p>However, we will only send marketing communications to you by email and/or SMS where you have consented to receive such content by email and/or SMS, or where we have another lawful right to send marketing to you using email and/or SMS. For example, in certain circumstances we may rely on our legitimate interest to send marketing by email and/or SMS to consumers who have purchased our Products and Services. We may also rely on our legitimate interest to send marketing by email and/or SMS to certain business users of our Site and our Products and Services.</p>	
<p>If we advertise to you on social media and other platforms</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>We may share your email address (usually in an encrypted or ‘hashed’ form) with third-party providers of social media platforms and other services, such as Facebook, LinkedIn, Twitter and other similar platforms (“Social Platforms”), so that the third party providers can try to “match” your data with the data of their registered users of their Social Platforms.</p> <p>Where there is a successful match, we will display our advertising to you when you use the relevant Social Platform (e.g., on your Facebook newsfeed). This is known as “custom audience” advertising, because we “customise” the audience that we want to reach on the relevant service.</p> <p>Some of the advertising that you see may be personalised to you. The data that we use to personalise our advertising, such as your Profile Data and Behavioural Data, will not be provided to the third-party providers of the Social Platforms. Please see the “Insight, analysis and retargeting through Cookies” section above to learn more about how we personalise advertising to you.</p> <p>This activity is also subject to the privacy choices you have elected to make on such Social Platforms.</p> <p>Our legal basis for processing</p> <p>It is in our legitimate interest to share your personal data with the third-party providers of the Social Platforms, so that we can advertise our Services to you when you use those Platforms.</p>	<p>Encrypted email address.</p>
<p>If we advertise to other people who share similar interests and characteristics to you.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>We may provide your personal data to third-party providers of other services as described in the “If we advertise to you on social media and other platforms” and the “Insight, analysis and retargeting through the use of Cookies” sections. If you are a user of those third-party services, we may ask the third-party providers of those services to find other registered users of their services who share similar interests and characteristics to you, which will be based on information that the third party holds about you and its other registered users.</p> <p>This is known as “lookalike” audience advertising because we are trying to show our advertising to people who “look like” you. Please note that such activity is also subject to the privacy choices you have elected to make on such third-party services.</p> <p>Our legal basis for processing</p> <p>It is in our legitimate interests to share your personal data with the third-party providers of other services so that we can advertise our Services to other individuals that use those services and share similar interests and</p>	<p>Encrypted email address.</p>

	<p>characteristics with you, although where this activity is undertaken through the use of Cookies please see the “Insight, analysis and retargeting through Cookies” section above) to learn about the legal basis that we rely on. You can opt-out of our sharing of your personal information with the third-party providers by exercising your rights as a data subject as set out below.</p>	
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Business administration and legal compliance.

<p>We may need to use your personal data to comply with our legal obligations or in connection with the administration of our business.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p> <p>Our legal basis for processing</p> <p>Where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.</p>	Various
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9 SHARING PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

Education establishment / Parents / Guardians or Tutors	We share personal data of students / children with the relevant account holder (e.g., our school, parent, tutor etc) as they will have access to your profile, activity, performance etc within their account functionality.
Third-party suppliers who provide applications / functionality, data processing or IT services	We share personal data with third parties who support us in providing our Platform and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, insight analytics, data back-up, security and storage services.
Payment providers and banks	We share relevant personal data of the paying party with third parties who assist us with the processing of payments and refunds.
Third-party email marketing and CRM specialists	We share relevant personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.
Third-party suppliers who assist us in administering our promotions	We share relevant personal data with specialist suppliers who assist us in administering our prize draws, prize competitions and other promotions.
Auditors, lawyers, accountants and other professional advisers	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
Law enforcement or other government and	We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.

regulatory agencies and bodies	
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10 HOW WE OBTAIN YOUR CONSENT

Where our use of your personal data requires consent, you can provide or withhold such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the “How to Contact Us” section above.

11 THIRD-PARTY LINKS

This Privacy Notice only applies to personal data processed by us through your use of our Platform and/or in connection with our business operations. However, from time to time, our Platform may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from our Platform to another website (even if you don’t leave our Platform) or request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website’s or third-party service provider’s own rules and policies. For example, if our Site invites you to connect with us on social media platforms such as Facebook and Instagram. When you click on the links we provide to such third-party platforms, you will be transferred from our Site to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

12 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA (“EEA”)

Where necessary in order to provide our Services, we may transfer personal data to countries outside the UK and the EEA including to those who have subscribed to receive the Services such as the relevant school, educational establishment, Parents/Guardians or Tutors.

Non-UK/ EEA countries do not have the same data protection laws as the UK and the EEA. In particular, non-UK / EEA countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK or the EEA, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.

13 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Services or otherwise under this Privacy Notice, we may retain your personal data for up to six years from the date of supply of the relevant Services and in compliance with our data protection obligations. We may then destroy such files without further notice or liability.

If any personal data is only useful for a short period (e.g., for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure, and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and

data processors (i.e., those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Platform and those who purchase our Products and Services.

15 PERSONAL DATA OF MINORS

Whilst our Platform may be used by minors (individuals under the age of **18**), under the supervision or via the account of an organisation or other adult, we only knowingly collect personal data of minors as outlined above. However, this does not prevent minors from providing personal data to us. If we do collect personal data of minors, we will comply with all applicable laws and regulations relating to the processing of personal data of minors.

16 YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in relation to the personal data we hold about you. If you would like to exercise any of these rights, please contact us using the details set out in the “How to Contact Us” section above.

Your right of access	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
Your right to erasure	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
Your right to restrict processing	You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the “How to Contact Us” section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.

Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the “How to Contact Us” section above.

As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner’s Office (“ICO”). Contact details for the ICO can be found on its website at <https://ico.org.uk>.