

CENTURY-TECH

PRIVACY NOTICE

This version is effective from: 1 May 2026

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 Services (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.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

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 Services via your school or other organisation (for example as a teacher or student, or sometimes parents), then unless otherwise specified, that organisation to which you are affiliated is the relevant Data Controller 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 when we are a Data Processor. In these circumstances, you should review your school or other organisation’s privacy notices to understand how, when, and why we will process your personal data on their behalf.

If you sign up directly with us and have your own subscription and account (for example as a parent or child, or a tutor), or if you’re engaging with us in another independent way such as browsing our Site or attending one of our own events, Century is the Data Controller, and we have broader permissions (and obligations) in relation to your Personal Data, as detailed below.

Different parts of this Privacy Notice apply in different ways to these two scenarios. Most of this Privacy Notice describes our activities when we are acting first and foremost as a Data Controller. Where something applies differently in our role as a Data Processor, this will be explained further below in each section.

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

When we are a Data Processor

When we act as a Data Processor, our responses will be determined by the organisation that is the Data Controller – that is to say, your school or other relevant organisation. You can still contact us via the methods above, but in these circumstances you may prefer to contact your school or other relevant organisation directly.

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. While students / children use our Platform, 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.

In order for students / children to use the Platform, 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 directly 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.

Information for children and students

If you are reading this Privacy Notice and you are a student at a school or other education provider, please speak to your school or education provider to understand more about how we use your personal data.

If you are reading this Privacy Notice and your parent or guardian has set it up so that you can use our Platform directly without involving a school, please ask your parent or guardian first to help you understand more about how we use your personal data, and if they ask us to then we can help them to explain if there are things that aren't clear to you.

Information for Teachers / Staff at educational establishments and tutors

Students should be referred to their education establishment's / your organisation's privacy policy and supporting information to understand more about how the personal data provided or captured in relation to the Services is used in the provision of education by that establishment / your organisation. Please also see Section 9 below about "*Sharing Personal Data*", which education establishments / your organisation should ensure has been explained to students.

It is the responsibility of each educational establishment and/or teacher and/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), the students understand how their personal data might be used and that 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 relating to the students. As part of our Terms and Conditions, the educational establishment / your organisation and/or you on their behalf, are required to acknowledge and warrant that all requisite authority from, and on behalf of, the student / child (including where relevant from the parent/guardian of the student) has been obtained and can be provided to us.

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 / your organisation and/or the parents and guardians or tutors to secure that consent.

It is the responsibility of each educational establishment and/or teacher and/or tutor to ensure that parts of the Platform which use generative artificial intelligence technology are only accessed by age-appropriate students.

Information for Parents / Guardians

If you are reading this Privacy Notice and you are the parent or guardian of a student at a school or other education provider, CENTURY is acting in its capacity as Data Processor and therefore acts under the instructions of the Data Controller, which is the school or education provider. Please speak to your school or education provider to understand more about how we use your personal data.

If you are a parent or guardian and your child is using our Platform through a direct relationship that we have with you, via our home learning product, our Terms and Conditions will have made it clear that you are responsible for making sure that your child understands how their personal data might be used and that you are responsible for providing to us all necessary consents and permissions for your child to use the Platform and for Century to receive, collect and process any personal data relating to your child. Please also see Section 9 below about "*Sharing Personal Data*", which you should make sure you and your child understand.

If there is anything in this Privacy Notice that you or your child would like to understand further, please contact us using the details set out in the "How to Contact Us" section above (**section 3**).

When your child reaches the age of 13 there is a legal requirement to retake consent directly from your child and we rely on the relevant educational establishment / organisation and/or you as the parents and guardians or tutors to secure that consent (in each case being the individuals in control of providing the child with login and ID access codes) and confirm it to us.

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; date of birth; username; educational establishment; date of birth; 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; any other unique numbers assigned to a device.	Teachers / Staff; Parents / Guardians / Tutors; Students / Children.
Location Data	time zone setting and network location data/metadata on the devices you use to access the Platform.	Teachers / Staff; Parents / Guardians / Tutors; Students / Children.
Marketing and Communications Data	Marketing preferences; service communication preferences.	Teachers / Staff; Parents / Guardians / Tutors.

Use of location data

Some of the Technical Data and Location Data we collect allows us to roughly identify the location of your device/computer when you interact with the Platform. We do this to ensure we are best able to support users and understand what time of day the Platform is being used to support schools/organisations. This information is used to help us provide better technical support solutions, as well as to fulfil our security and safeguarding responsibilities.

We do not collect precise geolocation data.

Use of AI and automated processing

We use artificial intelligence (AI) in our Services to give you several features and benefits. For example: (1) to tailor the Platform’s recommendations of tasks for students to complete next, such as to address weaker areas or to refresh past topics; and (2) (for some of our features but not all) to mark student responses (for example long-form written work).

We use AI models hosted on secure, private cloud infrastructure, and these models are only permitted to access information that does not contain your personal data. We **do not** use your personal data as input to any AI systems we operate — whether these are models we have developed and trained ourselves, or third-party AI services and APIs. We **do not** use your personal data to train any of the AI we use - all data on which AI models are trained is anonymised.

You should make sure that you/your child/students **do not provide any personal data** during the use of any AI features of our Platform.

As part of our relationship with, and obligations to, your school or other education provider, we may be required to share information with them about how you/your child interacts with our AI features.

Automated decision-making is the process of making decisions by automated means without any human involvement. Sometimes, this is done using AI. While we use AI in our Services, we do not make decisions about you based solely on automated processing that would have legal, or similarly significant, effects for you. We will notify you if this position changes.

If you/your child is using our Platform as a student at a school or other education provider, that organisation will determine how they use any automated processing done by our Platform. Please speak to your school or education provider to understand more about whether or not automated processing is used for making decisions.

Special categories of personal data – your sensitive information

In certain circumstances (when instructed by your school or education provider to do so), our collection of the different categories of personal data set out in the boxes above may include the collection of Special Categories of Personal Data (or “**Special Category Data**”) about you.

If you/your child is using our Platform through a direct relationship that we have with you, via our home learning product, we do not collect Special Category Data from you/your child.

When we are acting as a Data Processor we will process Special Category Data only on the instructions of your school or education provider and they will determine the legal basis and additional conditions that permit this, not us.

The only Special Category Data we will process (when instructed to do so by your school or education provider) are ethnicity and special educational needs and disabilities (SEND) data relating to students/children who use the Platform.

We will never collect other forms of Special Category Data (for your information, the law defines these categories as including information about religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, or information about your health, and genetic and biometric data). Please speak to your school or education provider to find out more information about the legal basis and additional conditions under which we are permitted to process your Special Category Data on their behalf.

Please see **section 8** below for more information about how and when we use Special Category Data.

Aggregated data

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate users’ Technical Data or Behavioural Data to calculate the percentage of users accessing a specific Platform feature in order to analyse general trends in how users are interacting with our Platform to help improve the Platform and our Services.

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:
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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. When we have described our legal basis for processing in the boxes below, this applies only in circumstances where we are acting as the Data Controller.

When we are a Data Processor

Separately to the reasons and legal basis described in each box below, when we are providing Services to your school or other organisation and the activity is happening in connection with that relationship then we will also have obligations under our contract with that organisation. For example, we may have committed to them that we will allow you the use of our Platform, that we will provide you with support and answer your enquiries, or we may have reporting obligations to the organisation.

In these circumstances, it is necessary for us to use your personal data to meet those commitments but we are doing so on behalf of your school/organisation as part of their relationship with you. As described in **section 2** above, the organisation to which you are affiliated is the relevant Data Controller, and we are their Data Processor. When we are acting as a Data Processor we will process your personal data on the instructions of your school/organisation and they will determine the legal basis for this, not us.

If you would like more information about how and why your personal data is used in these circumstances, you should refer to the privacy information provided by your school or relevant organisation.

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 (as applicable) 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 (this only applies when we are the Controller)</p> <p>(1) 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, and/or (2) 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>We do not process Special Category Data when we are the Controller, and only do so as Processor when instructed to collect it by a school or educational provider.</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>Location Data</p> <p>Special Category Data (only when we are instructed to do so by your school or education provider)</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 (this only applies when we are the Controller)</p> <p>(1) 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, and/or (2) 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 (this only applies when we are the Controller)</p> <p>(1) 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, and/or (2) 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</p>	<p>Behavioural Data</p> <p>Technical Data</p> <p>Location Data</p>

	secure and effective way and so that we can make improvements to our Platform.	
<p>If you use any interactive / chat / messaging features on our Platform.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</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 (this only applies when we are the Controller)</p> <p>(1) 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, and/or (2) 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 our Platform in a secure and effective way and 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>Location Data</p>
<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 (this only applies when we are the Controller)</p> <p>(1) 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 (this only applies when we are the Controller)</p> <p>(1) 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> <p>Location Data</p>

Customer reporting

<p>We provide reporting tools as part of the Subscription.</p>	<p>When chosen by the school or organisation as part of its Subscription and the services that we provide under our contract with them, we will send reporting and analytical information to teachers and staff to inform them about the students who use the Platform and how they are using it. This provides them with information to enable</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p>
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<p>This applies to Teachers/Staff.</p>	<p>schools/organisations/teachers/tutors to understand and analyse usage and results both at individual and collective levels, which they may use for their own business purposes and/or obligations.</p> <p>Please note we only carry out this processing activity when we are acting as the Processor and have been instructed to do so by your school or educational provider. They decide the legal basis for this processing. Please contact them if you would like to understand more about this.</p> <p>We only process Special Category Data when instructed to do so by a school or educational provider.</p>	<p>Transaction Data</p> <p>Behavioural Data</p> <p>Technical Data</p> <p>Location Data</p> <p>Special Category Data</p>
<p>We provide usage information as part of the Subscription.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>We may send automated usage emails to teachers and guardians to inform them of students' usage and progress. This lets them see how the Platform is being used and help them to encourage students' further usage and progress or make decisions about additional use of the Platform features.</p> <p>Our legal basis for processing (this only applies when we are the Controller)</p> <p>(1) we may need to do this in order to perform our obligations under our contract with you (or with the organisation you work for); and/or (2) it is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to provide a good standard of service, grow our business, and improve our products/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> <p>Location Data</p>

Customer service, enquiries, and service information.

<p>To manage our relationship with you</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>This may include providing you with service updates, information about your account (including expiry or renewal dates), emails to inform you how to use the Platform and new features, or notifying you about changes to our terms or our policies.</p> <p>Our legal basis for processing (this only applies when we are the Controller)</p> <p>(1) we may need to do this in order to perform our obligations under our contract with you (or with the organisation you work for); (2) we may need to do this to comply with our legal obligations; and/or (3) It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to 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>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 (this only applies when we are the Controller)</p> <p>(1) 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> <p>Location Data</p>

Surveys and feedback.

<p>If you complete our surveys or provide feedback on your experience of our Platform and/or our Services.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</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 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 (this only applies when we are the Controller)</p> <p>(1) 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>Identity Data</p> <p>Contact Data</p> <p>Profile Data</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 (this only applies when we are the Controller)</p> <p>(1) 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) and/or (2) 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> <p>Location 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 (this only applies when we are the Controller)</p> <p>(1) 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, and/or (2) it is in our legitimate interest or a third party's legitimate interest to use personal</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p>
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	data in such a way to ensure that the event is operated in an effective way.	
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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 Platform and our Services.</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 Technical Data, and certain Profile Data. Please see our Cookie Policy for further information, including details of our third-party partners.</p>	<p>Behavioural Data Technical Data Profile Data Location Data</p>
<p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</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 (this only applies when we are the Controller)</p>	
	<p>(1) 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. For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy.</p>	

Advertising and marketing activities.

Please note, this use of your personal data will always be carried out by us as the Data Controller, regardless of whether you are using the Services (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).

<p>If we send you marketing communications by post and/or email/SMS</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</p>	<p>Identity Data Contact Data Marketing/Communications Data</p>
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<p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>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>(1) 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 not need your consent to send marketing by email and/or SMS to consumers who have purchased our Products and Services. We may also send marketing by email and/or SMS to certain business users of our Site and our Products and Services. Please see the paragraphs below this box for more information about our marketing communications and your ability to opt out.</p>	<p>Profile Data</p> <p>Transaction Data</p> <p>Behavioural Data</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>(1) 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</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,</p>	<p>Encrypted email address.</p>

<p>characteristics to you.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors.</p>	<p>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>(1) 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 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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Direct marketing

During the registration process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us via email, post, and SMS. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity Data, Contact Data, Technical Data, Behavioural Data and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us using the details set out in the “How to Contact Us” section above (**section 3**).

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes (for example relating to order confirmations, updates to our Terms and Conditions, or checking that your contact details are correct).

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>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 (this only applies when we are the Controller)</p> <p>(1) 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. (2) For all other purposes described</p>	<p>All Data</p>
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<p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>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>	
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Anonymisation for research, statistics, and product development.

Please note, this use of your personal data will always be carried out by us as the Data Controller, regardless of whether you are using the Services (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).

<p>We may take steps to anonymise your personal data for research, statistical, and product development purposes.</p> <p>This applies to Teachers/Staff; Parents/Guardians or Tutors; Students/Children.</p>	<p>In some circumstances we may anonymise your personal data (so it can no longer be associated with you) before using the anonymous aggregated data in connection with the administration of our business and the development of our Services (as described in section 6 above). Once the data is anonymised, we may use this information indefinitely without further notice to you (because it is no longer personal data and cannot be associated with or identify you).</p> <p>Our legal basis for processing</p> <p>Where we use your personal data in this way to anonymise it, this activity is in our legitimate interests to improve our Platform and our Services.</p>	<p>Transaction Data Behavioural Data Technical Data Location Data Special Category Data</p>
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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. The third parties we may share your personal data with, and the reasons why, are:

<p>Education establishment / Parents / Guardians or Tutors</p>	<p>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.</p>
<p>Third-party suppliers who provide applications / functionality, data processing or IT services</p>	<p>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.</p>
<p>Payment providers and banks</p>	<p>We share relevant personal data of the paying party with third parties who assist us with the processing of payments and refunds.</p>
<p>Third-party email marketing and CRM specialists</p>	<p>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.</p>
<p>Third-party suppliers who assist us in administering our promotions</p>	<p>We share relevant personal data with specialist suppliers who assist us in administering our prize draws, prize competitions and other promotions.</p>

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 regulatory agencies and bodies	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.

We may also share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or assets. Alternatively, we might seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way set out in this Privacy Notice.

10 HOW WE OBTAIN YOUR CONSENT

Consent is not usually the legal basis we rely on when processing your personal data, and we rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose. Please see the information at **section 8** above for more explanation about the circumstances when we do / don't rely on your consent as our legal basis for processing personal data.

Where our use of your personal data is based on or requires your 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. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. 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 the countries of those third parties who have subscribed to receive the Services such as the relevant school, educational establishment, Parents/Guardians or Tutors.

We may also transfer your personal data to service providers that carry out certain functions on our behalf, and this may involve transferring personal data to countries outside the UK and the EEA.

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, as a general rule and unless we have specifically said differently elsewhere in 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.

However, we also have certain legal, contractual, regulatory, tax, accounting or reporting requirements that we have to satisfy, especially when we provide our Services as a Data Processor for another organisation. and so the period for which we keep your personal data may vary in different circumstances. This means that:

- if we are providing Services to you directly (we are the Data Controller) then we may keep your personal data for up to six years after we provide the Services to you; or
- if you are using our Services via your school or other organisation (we are their Data Processor) then we may keep your personal data until six months after our contract with that organisation ends.

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.

In some circumstances you (or the organisation through which you use our Services) can ask us to delete your personal data sooner. Please see **section 16** below for more information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research, statistical, or product development purposes, in which case we may use this information indefinitely without further notice to you (because it is no longer personal data and cannot be associated with or identify you).

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 sub-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 (**section 3**).

Please note that the decisions, and our responses to you, about your exercise of these rights will be made by the Controller. While your rights do not change when we are acting as a Processor, the decision-making does, and our responses to you in such circumstances will be determined by your school or education provider.

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 (though we may need to verify the accuracy of the new data you provide to us). If we have shared your personal data with others, we'll let them know about the

	<p>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.</p>
<p>Your right to erasure</p>	<p>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.</p> <p>Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.</p>
<p>Your right to restrict processing</p>	<p>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.</p>
<p>Your right to data portability (transferring your personal data)</p>	<p>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.</p> <p>Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>
<p>Your right to object</p>	<p>You can ask us to stop processing your personal data where we are relying on our own or someone else's legitimate interest as the legal basis to process your personal data. In some cases, we may demonstrate that we have compelling legal grounds for the processing which override your right to object.</p> <p>You also have the absolute right to object at any time to the processing of your personal data for direct marketing purposes (see 'Opting out of marketing' in section 8 above for details of how to object to receiving direct marketing communications).</p>
<p>Your rights in relation to automated decision-making and profiling</p>	<p>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.</p>
<p>Your right to withdraw consent</p>	<p>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 (section 3) or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.</p> <p>Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.</p>
<p>Your right to lodge a complaint with the supervisory authority</p>	<p>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.</p>

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>. You have the right to make a complaint to the ICO; however, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint.

No fee usually required

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex, if we need more information from you so that we can respond, or you have made a number of requests. In this case, we will notify you and keep you updated.