



Privacy Policy

This privacy policy provides information about how we collect and process your personal data through your use of our educational websites (www.spagtastic.com, student.spagtastic.com and school.spagtastic.com) known as Spagtastic which are operated by Cumbria Educational Software Ltd. When we use the terms “we”, “us” and “our” in this privacy policy we are referring to Spagtastic. We are the data controller (ICO registration number ZA829933) in relation to the processing activities described below. This means that we decide why and how your personal information is processed.

This privacy policy should be read in conjunction with our Terms and Conditions so that you understand how any personal data collected by us is used.

About Spagtastic

Spagtastic (Company Number: 13040227) is a subscription based online e-learning resource for primary school children in KS1 and KS2 to promote learning of spelling, punctuation and grammar skills (SPaG). Spagtastic works across all mobile, laptop and desktop devices and it fully aligns with the English National Curriculum with coverage from Year 1 up to Year 6.

The types of information we collect.

For our subscriptions (including on a trial basis) we may collect and process certain types of information about you as follows:

- School name, Unique Reference Number (URN), address and contact information (to manage your school subscription)
- Teachers' names and email addresses (to create accounts)
- Students' forenames, surnames and teacher defined groups that they belong to such as their year group (to create accounts, set tasks and analyse results/track progress)
- Students' responses to questions, the date completed and the time spent answering them (to analyse results/track progress)
- Interactions between you and us such as correspondence with our customer and technical support team

This information is needed in order to fulfil our contractual obligations to you as it is necessary to correctly identify users and manage their accounts.

When you register with Spagtastic and provide the requested personal data, the school is deemed to have a lawful basis (in accordance with all applicable data protection laws) for supplying such data and information for and on behalf of all users (to include both teachers and students).

It is the school's responsibility to ensure that they have a sufficient lawful basis for supplying all data to us. Where the lawful basis that the school is relying on is “consent”, it is the school’s responsibility to seek and

confirm all necessary parental consent for all students. If a school does not have a lawful basis for supplying us with personal data, any user to which this applies must not use the site, and the school must promptly inform us so any relevant data can be deleted from our site.

We do not collect any unnecessary or sensitive personal data from users.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by the school, students and teachers for one of the following reasons:

- To provide access to Spagtastic
- To identify each individual teacher and student and to manage their accounts
- To allow teachers and students to analyse their progress and performance based on their answers to the questions for each topic.

We also receive personal information indirectly from the following sources:

- Data is also collected automatically from a device when users visit Spagtastic. Examples of this data include IP address and browser version.
- Information may also be collected from third party sources, such as Amazon Web Services who provide technical information to us.

Some of this information may be collected using cookies or similar tracking technology (see cookies later in this document).

How we use your personal data

The most common uses of personal data of users, including any prospective users are:

- To carry out our contractual obligations with you and to allow you to access our products and services
- To register teachers and students as new users
- To send confirmation of new subscriptions and of new user accounts
- To administer and manage accounts
- To manage purchased subscriptions and payments and to provide quotes to prospective schools
- To calculate results for each student or group in order to provide individual feedback and statistical reports and analysis
- To notify you about changes to our terms and conditions or our privacy policy
- To provide quotations and updates about our products and services
- To provide feedback for each user, class or school
- To analyse data to allow us to improve the products and services we offer
- To deliver relevant information about features of the products we offer
- To keep our site secure
- To correspond with you about our products and services

How we use your personal data for marketing

If you consent to marketing, we will use your personal information to:

- Contact you to inform you about new products and services we will be providing

- Send you requested information about our products and services

The lawful bases that we rely on for processing your information under the General Data Protection Regulation (GDPR)

- It is necessary to enable us to fulfil and perform our contractual obligations with you.
- It is necessary for our legitimate interests, and your data protection interests or fundamental rights do not override those interests.
- Clear consent has been given to allow us to process personal data for a specific purpose.

Who we share information with

We will keep your personal information confidential and will not share, sell or distribute your personal information with unrelated third parties. However, we may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. We use Amazon Web Services (AWS) for storage of data and automated email services, Quickbooks accounting for invoicing, Microsoft 365 for communications and Google for analytics.

How we keep your information secure

Spagtastic is committed to keeping your personal information secure. We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The data that we collect from you is stored on secure servers. We use Amazon Web Services (AWS) which are located in Europe (London EU West 2 region). All traffic and passwords are encrypted.

You and your students are responsible for keeping your passwords confidential. We ask users not to share their passwords with anyone.

How long we keep your personal data for

When we collect your personal information, it is retained for as long as it is needed so that we are able to provide you with the service you have requested. We do not retain personal information for longer than is necessary. When we have no ongoing business or when you request that we delete information, we will take reasonable steps to delete or anonymise it. Where possible, all student will be deleted within 8 weeks of a subscription or free trial ending, unless a subscription has been renewed.

We may need to retain and use your personal information to comply with our legal and regulatory obligations, to resolve disputes and to enforce our terms and conditions.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Cookies

A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device.

We use two type of cookies at Spagtastic. The first is an essential cookie that stores your login token which allows you to move around the site. Without this cookie, the services you have asked for cannot be provided. They are deleted when you close the browser.

The second type of cookie we use is to help us better understand your use of Spagtastic. This cookie is for the use of analytical software. This software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of Spagtastic. This does not store, save or collect personal information. Please read Google's privacy policy regarding use of cookies for further information.

How to contact us

If you have any concerns or questions regarding the use of your Personal Information, please contact us at info@spagtastic.com.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at info@spagtastic.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>