

Privacy Notice

This privacy notice covers our Apple iPad / Android app ARC Maths and the data we collect from you when you use it, together with the personal data we process when you contact us with an enquiry.

These are our reasons for collecting it, what we do with it and what your rights are.

Who are we?

We are Arc Education (York) Ltd., Blake House, 18 Blake Street, York, YO1 8QG (company registration number 11127187).

You can call us on 01904 215677, and email us at privacy@arceducation.co.uk.

We are the data controller for some of this processing and are registered with the Information Commissioner's Office (ICO). Our registration number is ZA459198.

Purpose of processing

We act as the Data Controller when you purchase or use our app directly (a private user).

Where we are contracted by a school to provide the app to their pupils then we will act as the Data Controller when processing personal data of school staff in connection with our contract (or potential contract) with the school.

Where access to our app has been arranged by your school then we are acting as a Data Processor on behalf of your school who is acting as the Data Controller.

If you are a private user, then we process your personal data:

- to respond to enquiries about our services,
- to provide our services to you,

If you are a member of school staff, then we process your personal data:

- to respond to enquiries about our services,
- to provide our services to your school,
- to market our services to your school

If you are a school user (i.e. your school has arranged for you to have access to our app), then we process your personal data:

- on behalf of your school,
- and we will not market our services to you

Basis of processing

We can only process personal data where we have a specific lawful basis to do so, this section details what each basis is.

Where we are responding to enquiries about our services or products we process your personal data because it is in our legitimate interest to do so in order to deal with your enquiry.

Where you are a member of school staff and are communicating with us to provide our services to your school, then we process your personal data because it is in our legitimate interest to do so in order to take the necessary steps to provide or support our products or services. Where we are marketing our services to your school we process your personal data because it is in our legitimate interest to do so.

For private purchasers who are also the user of the app, then we process your personal data because they are necessary for the performance of a contract with you.

For private users who are not the purchaser of the app, then we process your personal data because it is in our legitimate interest to provide our service to you.

Where we are relying on our legitimate interests to process your personal data you may object to that processing at any time.

If you are a school user and have any questions about the basis of processing your personal data then please contact your school.

What personal data do we collect?

If you are contacting us to enquire about our services, or are a member of school staff to whom we supply our services, we will collect:

- Your name
- Your email address
- Your telephone number
- Your school name if you are a member of school staff, and your role in the school

If you are a private user of our app we will collect:

- Your name
- Your email address

- Performance data (topic answers, correct/incorrect answers and their frequency, when to re-present a topic, date and time of last use, frequency of use)

When you purchase our app on the Apple App Store / Google Play then we do not collect your Apple ID / Google ID, nor any payment information. Please see Apple's privacy information at <https://www.apple.com/uk/privacy/> , or Google's privacy information at <https://policies.google.com/privacy> for more details.

If you are a school user of our app we will collect:

- Your name
- Your school email address
- Your gender (male, female, not disclosed)
- Your month and year of birth
- Your school code (each school has a unique code for ARC Maths, they will give you this code so that you can use the app)
- Your school may also assign you to a class, module or other grouping according to their needs
- Performance data (topic answers, correct/incorrect answers and their frequency, when to re-present a topic, date and time of last use, frequency of use)

Special category data

There are additional rules we must follow if we collect certain types of more sensitive data, known as Special Category Data. These include details of your ethnicity, beliefs, health and sexuality. We will never collect any special category data about you.

Do we ever share personal data?

We will share your data if required to do so by a legitimate law enforcement agency.

If you are a school user then your school has access to your personal data, please ask your school if you have any questions about this.

We share anonymised data (your use of the app, but without your name and email) with universities for research purposes.

We share your data with our UK based developers to support and improve the app.

If you consent to the use of analytics cookies then we will be sharing personal data with those analytics providers (Google Analytics and Crashlytics), also if you consent to the use of Marketing cookies then we will be sharing personal data with those providers (Facebook).

If we are communicating with you via email or social media channels we will be sharing your personal data with those email and social media providers.

We will never share or sell your data to any other third parties without your permission.

How do we keep your data secure?

We take sensible steps to keep your data secure:

- All data sent between you and us are encrypted in transit
- All data we hold in our computers are encrypted at rest
- All our staff have a confidentiality agreement in place
- We have no access to the payment details used by private users to purchase the app

Your Rights

You have a number of rights relating to the processing of your data, if you would like to use them or have any questions then please contact us. If you are a school user you should contact your school to ask them about your rights, if you contact us we will ask you to contact your school.

We won't charge you for doing any of the following, however we may make a charge in the case of frequent repeat requests:

- Awareness: You have the right to be fully informed about why and how we process your information. This privacy notice is intended to meet that requirement, but please do contact us if you have any questions
- Access: You have the right to a copy of the data we hold about you
- Rectification: If you think some of the data we hold is wrong then you have the right to ask us to correct it
- Erasure: You have the right to ask us to delete the data we hold about you where we are processing your data based upon your consent, and you withdraw your consent, or where we are processing your data based upon our legitimate interest and you object to that processing and we agree with your objection.
- Restriction: You have the right to ask us to restrict the processing of personal data whilst we check its accuracy, if you think the processing is unlawful, if you believe we no longer need to process the data but you need us to store it due to pending legal claims, or when you object to our processing based upon our legitimate interests and we are assessing the validity of that.
- Object: Where we are processing your personal data based upon our legitimate interests you have the right to object to that. If your objection is valid (for instance in the case of any direct marketing activity) then we will stop processing your personal data for that purpose.

- Data portability: You can request a copy of your data in a digital format which you can then supply to another provider
- Automated decisions and profiling: You have the right, in certain circumstances, not to be subject to decisions based on automated processing (including profiling) if it has a significant or legal impact on you. We aren't taking any automated decisions about you, nor profiling you.

How long do we keep your data for?

Where we are relying on your consent or our legitimate interests to process your data then we will keep your personal data until you withdraw your consent for us to use it, or object to the processing in our legitimate interests and we agree with your objection.

Where you simply unsubscribe from the app then we will retain your data for 18 months.

A school can request that we delete the personal data of school users at any time, and in the absence of any specific request from the school we will retain user's personal data for the default period of 18 months.

We will also retain your personal data according to other applicable UK laws and regulations, depending upon the nature of the services we have provided to you.

Cookies

We will always ask for your consent to install analytics or marketing cookies on your device. We use Google Analytics and Facebook cookies to provide data about how our website is being used and to improve the advertising from us when you are using Facebook.

You can give your consent to cookies, and withdraw your consent for cookies, using the pop-up CIVIC cookie consent tool which displays on our website.

A small cookie from the CIVIC cookie consent tool will also be installed to record the choices you make and ensure that your consent, or its withdrawal, are properly obtained and respected.

What happens when I follow links to other sites?

If you follow a link from our site to another site then you should read the privacy notice on the other site prior to providing your data to them.

Where do we process data?

All personal data is processed in the UK or EU.

If you have consented to analytic and marketing cookies being installed in your device then data collected by them will be transferred to the USA under the protection of Standard Contractual Clauses to uphold your rights under data protection legislation.

Making a complaint

Please contact us at the above address. You can also contact the Information Commissioner's Office (ICO) on their helpline 0303 123 1113 or online at www.ico.org.uk. If you should contact the ICO they will normally ask you to contact us first.