

# PlanetTeach Privacy Policy

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At PlanetTeach, we take your privacy and online safety very seriously.

This Privacy Policy tells you what personal information we collect, and what we do with it. It forms part of PlanetTeach’s Terms of Use.

When you use PlanetTeach, you signify that you accept this Privacy Policy, as well as PlanetTeach’s Terms of Use. For information on the cookies we use, please view our [Cookie Policy](#).

We are a “data controller”. By “we”, we mean PlanetTeach. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Policy.

It is important that you read this policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about or provided by you, so that you are aware of how and why we are using such information.

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# Summary

## Information you give us

We only ask teachers to provide us with their **pupil's name, school and year group**. This is personal data as defined in the **GDPR** (EEA).

We do not ask student users to enter any personal information.

## Information we collect automatically

When you use PlanetTeach, we collect some information automatically. For example, we collect educational progress data as you answer questions.

If you're a Student User, this information may be accessed the Teacher Users linked to your School.

To help us improve PlanetTeach, we also use analytics software to collect usage information.

## Student accounts

We don't allow children to set up their own Student logins directly. PlanetTeach's Student accounts will be created by a Teacher User

## Encryption, and keeping your information safe

We encrypt your information using SSL while it's being transferred between your computer and our servers.

On your web browser, you'll see a padlock beside the PlanetTeach web address. Clicking the padlock gives you the details of our security certification.

## Storing and processing your information

Information we collect on Student Users will only be stored and processed in the European Union.

## Social features

PlanetTeach currently has no social features that allow students to communicate freely.

## What we do with your information

With the exception of our service providers, we do not allow anyone else to access your information, unless required to do so, for example by law.

We only use your information to provide, evaluate and improve the PlanetTeach service.

We only use service providers that we are confident are compliant with all relevant laws and regulations.

## Advertising

PlanetTeach does not carry paid advertisements for anyone else.

## Your rights over your information

Teacher Users can view and amend information they've given us. This is in keeping with the regulations of GDPR.

We'll store your information as long as you keep your login to PlanetTeach, but you can ask us to delete your account.

Below, you'll find more information on the rights you have.

## The legal basis for processing your information

The provision of the PlanetTeach service is intended to help schools with their pupil's education and development. It is in our legitimate business interests to collect and process your personal information so that we can continue to provide the PlanetTeach service.

## Information users give us

### Student Users: Children and under 18s.

If you are under 18,

- you are only permitted to log in to PlanetTeach as a Student User;
- before you can log in as a Student User, a teacher must create an account for you. PlanetTeach will generate teacher accounts at the time of purchase.

We will not ask student users to enter information that, by itself, is considered personal information.

If we're informed that we have collected personal information from anyone under 18 without permission from someone with the authority to give permission, we will delete that information as quickly as possible. If you believe that this has happened, please contact us at [support@planetteach.co.uk](mailto:support@planetteach.co.uk)

Any personal information is provided by the teacher who created the student account.

In some of PlanetTeach's spelling games, students may be asked to input a word as an answer. When they play these games, the student will only see their own answer. Teacher Users will be able to view what their students have written, for the purpose of analysing progress.

## Teacher Users

The following personal information is collected from Teacher Users.

On sign-up, Teacher Users enter their:

- first and last name
- email address and password
- school name and address

Teacher Users may then enter information about their students:

- first name and last name initial (i.e. BenS)
- required difficulty (school year)
- school leaving year
- crew (i.e. Class name / intervention group)

The information we ask teachers to enter about their students may change in the future. If this is the case, we will ensure that this change is necessary for provision of the PlanetTeach service. We will also update our privacy policy to reflect this.

It is the responsibility of schools to inform PlanetTeach of the teacher accounts they require at the time of purchase. Teachers cannot invite other teachers and should any adaptations be required, schools should contact PlanetTeach as soon as possible. It is the responsibility of the teacher signing up the school to ensure they have permission to access the personal information of students and teachers stored with PlanetTeach.

## All Users

All users can customise their avatar rocket through the pupil dashboard .

In order to provide the best possible service, we may extend the types of information we ask users to give us. If we do this, we will tell you what extra information we would like to collect from you, and why we are doing it.

## If you don't provide personal information

You can choose not to give us your information. However, this may prevent you from using most parts of PlanetTeach. If we are unable to provide you with the PlanetTeach service because you fail to provide us with the personal information requested by us, we may have to cancel all or part of the PlanetTeach service. We may also be prevented from complying with our legal obligations. We will tell you if this is the case at the time.

## Information we collect automatically from users

When you use PlanetTeach, we will collect the following information automatically:

### For Student Users

- educational data from your activity on PlanetTeach, for example accuracy and speed of answers to PlanetTeach's questions;
- text written in PlanetTeach's writing games.

### For all Users

- data on your use of PlanetTeach, for example the last time you logged in;
- technical information, for example the device you use, your operating system and your IP address.

The data we collect automatically may be linked to your account and to the personal information that you or your teacher have given us.

Some of the information that we collect from Student Users may be accessed by the Teacher Users linked to their PlanetTeach school..

We also use analytics software to help us understand how PlanetTeach is used. For example, to help us optimise our email communication, we may use customised links, or small images called web beacons. These allow us to understand how our messages are received by our users.

In order to provide the best possible service, we may decide to extend the types of information we automatically collect from users. If we do we will tell you first.

For information on the Cookies that we use, please view our Cookie Policy.

## How we use your information

The situations in which we will process your personal information are listed below. We have indicated the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved. Here is a reminder of the legal bases under which we collect and process your data:

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests **(Condition 1)**.
2. PlanetTeach is intended to help students with their education and development, and to help their educators support this.
3. Where we need to comply with a legal obligation **(Condition 2)**.
4. Where we have your consent or are otherwise permitted to provide you with electronic marketing information **(Condition 3)**.
5. Where you are a Teacher User and we need to perform the contract we are about to enter into or have entered into with you as set out in the PlanetTeach Terms of Use **(Condition 4)**.

## We use information held about you in the following ways:

### Information you give to us

We may use this information:

- to provide you with the information, products and services that you request from us (Condition 1 and Condition 4);

Your information is used during the normal functioning of the PlanetTeach service. This may include:

- personalising PlanetTeach for you;
- informing you about our services, or to help you to use them, such as telling you about a new PlanetTeach game, or notifying you of the end of a trial period;

- identifying and, where necessary, acting against improper or illegal use of PlanetTeach. This helps keep PlanetTeach safe for all of our users;
- analysing usage patterns, requesting feedback from you or conducting research on the educational impact of our services so that we may improve them;
- to provide you with information about our services. We will contact you for marketing purposes by electronic means only if you have consented to this or we are otherwise permitted by law to contact you (Condition 3);
- to notify you about changes to our service (Condition 1 and Condition 4);
- to ensure that content from our site is presented in the most effective manner for you and for your computer (Condition 1);
- If you have given us your email address, we may send you messages via email. This may include information about new features or services, or about your usage of the site, or the usage of others in your PlanetTeach School. To change your mind about which types of email you receive from us, please contact [support@planetteach.co.uk](mailto:support@planetteach.co.uk). Please note that there are certain emails that you can't opt out of receiving, unless you delete your account entirely, as these are concerned with the administration of your account (Condition 1 and Condition 3).

## **Information we collect about you.**

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes (Condition 1);
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer (Condition 1);
- to allow you to participate in interactive features of our service, when you choose to do so (Condition 1);
- as part of our efforts to keep our site safe and secure (Condition 1);
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you (Condition 1);
- to make suggestions and recommendations to you and other users of our site about services that may interest you or them (Condition 1).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **Automated decision-making**

The data that we collect from you is used to make some automated decisions about your experience on PlanetTeach. For example, our algorithms to help automatically decide the level of questions that you are asked to answer. This enhances your experience of PlanetTeach as a learning tool by tailoring the service to your exact learning needs. We do not anticipate that the automated decisions we make would impact our users in a legal, or similarly significant, manner.

## Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is related to the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law (Condition 2).

## How we store and process your information

Your information is stored and processed on our servers and those of our service providers. For security reasons, payment card details are not held by us and are stored instead by our payment service provider. While your information is being transferred to our servers, it is encrypted using SSL. This helps to protect it in transit.

Information we collect will only be stored and processed in the European Union.. However, to ensure that your personal information does receive an adequate level of protection appropriate measures are put in place to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. Therefore, transfers of this information from the European Union to the USA are done in such a way as to ensure an adequate level of protection such as by using the EU-US privacy shield or another appropriate safeguard, such as the model contract clauses approved by the European Commission.

We also collect information from Teacher Users that doesn't relate to individual students – for example, in our online accounting systems. We may transfer this information to other countries. Suppliers of support services to PlanetTeach – for example, the provider of our data storage – may process any of the information we collect on our behalf.

We will take all steps reasonably necessary to ensure that this information is treated securely.

## Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

With that in mind, we will keep your personal information as long as your PlanetTeach account exists. We may also need to keep your information to comply with our legal obligations, or to resolve disputes or enforce our agreements. Teacher Users may ask us to delete personal information held within their PlanetTeach school linked to their account by contacting us as described below. We will do this within 30 days of your request except where we need to keep your information to comply with our legal obligations, or to resolve disputes or enforce our agreements.

If you sign up as a Teacher User you will receive an account verification email. If you do not complete your registration within seven days of receipt of the email, a new code will need to be generated. It is the responsibility of the school to let PlanetTeach know if a Teacher User needs to be deleted.

The following information will not be deleted:

- after a request to delete the Student User accounts will not be deleted if they are also linked with a PlanetTeach School.
- any information required to protect the safety of other PlanetTeach Users will not be deleted;

We may also use aggregated data that has been derived from your information after you have deleted it. However, this will not be in any way that might identify you personally.

## Data Sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

If you are based in the EU, we may transfer your data outside of the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

We will disclose your information:

- where we believe in good faith that disclosure is required by law;
- to protect the rights or safety of PlanetTeach users;
- to protect the property or rights of PlanetTeach or its employees;
- where there has been a clear breach of our licensing terms. In this case we may share information with our partners, lawyers and/or law enforcement agencies in the relevant country;
- if you are a Student User, and your login is linked to a PlanetTeach School; in this case, any Teacher Users who are members of that PlanetTeach School will be able to access your information;
- where we have engaged a third party to provide us with services to help us provide PlanetTeach, and that third party requires us to share your information with them. Examples of this include research on the effectiveness of the PlanetTeach service, sending you messages by email, storing or processing data, and processing payment. We will ensure that we only do this for the purposes of providing you with and improving the PlanetTeach service, and that these third parties have no right to use your information except as required to provide the services we engage them for;
- when you have given explicit permission to pass your information to a third party.

### **Which third-party service providers process my personal information?**

“Third parties” means third-party service providers and other entities within our group. The following activities are carried out by third-party service providers: system administration, processing of subscription

payments, data storage and data hosting and the provision of professional advisory services (including solicitors, auditors and insurers providing legal, accounting and insurance services).

## **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies and the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system administration, data storage and data hosting.

## **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **Third party advertisements**

We do not carry any paid advertising on PlanetTeach.

## **Keeping your information safe**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Your information is protected by your password. We also take all reasonable steps to prevent attack on PlanetTeach.

Teacher Users are responsible for using their best efforts to select and protect their login details, including restricting access to your PlanetTeach account, and logging off after using PlanetTeach.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

# Rights of access, correction, erasure, and restriction

## Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## Your rights in connection with personal information

Under certain circumstances (where the GDPR applies), by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information** to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the PlanetTeach Data Protection Officer in writing.

## No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose (such as electronic marketing), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Data protection officer**

We have appointed a data protection officer to oversee compliance with this Privacy Policy. If you have any questions about this Privacy Policy or how we handle your personal information, please contact the data protection officer at [privacy@planetteach.co.uk](mailto:privacy@planetteach.co.uk). Alternatively, Planet Teach Solutions Ltd., 9 Chaffinch Chase, Gillingham, Dorset. SP8 4GP.

## **Updating this Privacy Policy**

We may change this Privacy Policy from time to time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## **Data Protection Supervisory Authority / The Information Commissioner's Office**

If you are an EU citizen or our use of your personal information is subject to the GDPR, you also have the right to lodge a complaint about how we handle your personal information with an EU data protection supervisory authority.

In the UK, the supervisory authority is the Information Commissioner's Office / the ICO. You can call the ICO's helpline on +44 (0)303 123 1113. See also <https://ico.org.uk/global/contact-us/>.

## **How to contact us**

If you have any query regarding this Privacy Policy or your Personal Information on PlanetTeach, please e-mail [privacy@planetteach.co.uk](mailto:privacy@planetteach.co.uk). Alternatively, please write to Planet Teach Solutions Limited, 9 Chaffinch Chase, Gillingham, Dorset, SP8 4GP.