

PRIVACY POLICY SPELLING BEATS CIC

Our website platform (www.spellingbeats.com) is referred to as (“**Site**“) throughout this Privacy Policy

1. WHO WE ARE

Spelling Beats CIC (company number: 11010243), collects, uses and is responsible for certain personal information about you. When we do so, we are regulated under the [General Data Protection Regulation](#) (‘GDPR’) and we are responsible as a ‘processor’ of that personal information for the purposes of those laws, the ‘controller’ being the school or other educational organisation who has subscribed to Spelling Beats.

2. HOW TO CONTACT US

Email: gdpr@spellingbeats.com.

3. DATA PROTECTION

3.1 Spelling Beats CIC is registered with the ICO. Our registration reference is **ZA609534**

3.2 Our **Designated Data Protection Officer** is Miss Michelle Lockwood.

3.3 If you have any questions about this Privacy Policy or the information we hold about you, please contact us at the above address or by email: gdpr@spellingbeats.com.

4. GENERAL DATA PROTECTION REGULATION (GDPR)

4.1 New UK and EU data protection legislation known as GDPR came into force on 25th May 2018. Spelling Beats CIC has embedded effective data protection systems in line with this legislation.

4.2 As part of this work, we have analysed how we process and protect personal data and this has led to a number of actions which can be seen in this [Privacy Policy](#), [Terms of Use Policy](#), and [Terms of Purchase Policy](#)

4.3 Here are some useful links to GDPR:

a) The Information Commissioner’s Office (ICO) <https://ico.org.uk>

b) Fully searchable guide to GDPR legislation <https://gdpr.algolia.com>

c) The Government Guide to the General Data Protection Regulation (GDPR) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/711097/guide-to-the-general-data-protection-regulation-gdpr-1-0.pdf

d) The ICO GDPR and Brexit <https://ico.org.uk/for-organisations/data-protection-and-brexit>

5. INFORMATION THAT WE COLLECT

5.1 **Spelling Beats CIC** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

5.2 **The personal data that we collect concerns:**

a) **Schools**

- i. Billing contact details (School name, address, email address, and contact number)
- ii. Our payment provider (Stripe) holds payment card details. Stripe have their own data protection regulations You can view these here: <https://stripe.com/gb/guides/general-data-protection-regulation>
- iii. We also collect data about the type of school (i.e. Primary, Secondary, Special).

b) **School Lead** (person who sets up and manages their whole school subscription)

- i. Contact details: first name, surname, school, email address and optional mobile phone
- ii. Pupil/student groups (lists of students)

c) **Teacher**

- i. First name, surname, email address

d) **Students**

- i. First name, surname, email address (optional)
- ii. You may also opt to provide further pupil details, to include: pupil premium indicator. We use this information as we are a Social Enterprise Organisation: Spelling Beats Community Interest Company (CIC). Therefore, it helps us to report and analyse specific data more effectively.

e) **Accounts Administrator /Finance**

- i. First name, surname, email address

5.3 **We collect information in the ways below:**

- a) an online admin system: this gives the **School Lead** access to add, amend and delete teacher and student details. Teachers can also have access to add, amend and delete student details. Students can add and amend their email address and passwords.

- b) website orders (subscription), using third party companies: Stripe (see section 14)
- 5.4 We may also collect details of other interactions that you and/or your Users have with us, together with any other information that you and/or your Users choose to provide us with, for example, through correspondence and interactions with our customer and technical support teams.
- 5.5 This information is required in order to fulfil our contractual obligations to you as it is necessary to correctly identify each registrant as a site User, manage their account and for other purposes identified below. It is impractical in most circumstances for Users to remain anonymous, and we may not be able to interact with you, provide access to the Site, or answer your enquiry if we are not able to identify Users or collect your personal information.
- 5.6 Please note that by subscribing to the Site and providing the requested personal information for subscription or merchandise orders, the School is deemed to have a lawful basis (pursuant to all applicable data protection laws) for supplying such data and information for and on behalf of all Users (to include both teachers and pupils). 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 pupils. If a school does not have (or in the future no longer has) a sufficient lawful basis for supplying us with such 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 Sites.
- 5.7 Please note that by registering with the Site and providing the requested personal information for subscription or merchandise orders, consent to provide us with information for and on behalf of all Users (to include parents, tutors and children) is deemed to be given. Users who do not wish to give this consent must not use the Site.
- 5.8 We do not, however, collect any unnecessary personal information from Users (for instance, information about religious beliefs, medical history etc).

6. HOW WE USE YOUR PERSONAL DATA

6.1 **The purposes and reasons for processing your personal data are detailed below:**

- a) We collect your personal data in order to provide you with:
 - i. an online program for users to teach, learn, practise and be assessed on spelling;
 - ii. to ensure that orders are completed;
 - iii. and that you are able make the most out of the subscription.
- b) We collect and store your personal data as part of our legal obligation for the organisation's reporting, accounting and tax purposes

- c) We will occasionally send you marketing information where we have assessed that it is beneficial to you as a prior subscriber and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.

6.2 Why do we collect this specific information?

- a) **Email** is used for verification of payments, synchronisation of data, verification of log-in details, password reset; providing marketing, news and updates and/or changes in relation to our Site, our Products and our Services; and to provide information of any third party services we may feel are of use to you. Emails include an 'opt out' link should you wish to stop receiving communication
- b) **School name, address and contact details** are required for payment and billing information and to set up/manage user accounts
- c) We collect and record **student scores** as data, based on calculations, so that students, teachers and schools can monitor interaction, progress, create competition between users and offer rewards.

7. YOUR RIGHTS

7.1 Under the [GDPR](#) you have a number of important rights free of charge. In summary, those include rights to:

- a) access your personal information and to certain other supplementary information that this Privacy Policy is already designed to address
- b) require us to correct any mistakes in your information that we hold
- c) require the erasure of personal information concerning you in certain situations
- d) receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations
- e) object at any time to processing of personal information concerning you for direct marketing
- f) object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- g) object in certain other situations to our continued processing of your personal information
- h) otherwise restrict our processing of your personal information in certain circumstances

- 7.2 For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).
- 7.3 If you would like to exercise any of those rights, please email or write to our Data Protection Officer (see section 2)
- 7.4 If you would like to unsubscribe from any emails you can click on the 'Opt Out' button at the bottom of the email.

8 STORING & SHARING PERSONAL DATA

School Users

- 8.1 Once schools have successfully paid and have obtained a subscription;
- a) the **School Lead** role can manage the administration of the program, view teacher, class and student information. They can view whole school leaderboard, but this does not display individual student's names, only their score, level, DJ name and class
 - b) **Teachers** have access to view, add, amend and delete student details for their class. Teachers can view the rest of their school's leaderboard data. The leaderboard does not display individual student's names, only their score, level, DJ name and class
 - c) **Students** can view their own data and add/amend their email address add password. Students can view the leaderboard data of all students from their school. The leaderboard does not display individual students' names, only their score, DJ name and class.
- 8.2 Sharing DJ names, instead of the student's real name, ensures the anonymity of students within a class, between classes and within a school.
- 8.3 Schools can only view their own school data and leaderboard scores
- 8.4 If we have collected and processed users' personal information with their consent, then users can **withdraw their consent** at any time. Withdrawing consent will not affect the lawfulness of any processing we conducted prior to withdrawal, nor will it affect processing of personal information conducted in reliance on lawful processing grounds other than consent.

Other Users

- 8.5 Only the "System Operators" (Spelling Beats Director and Software Developer) can view and access the data in accordance to sections 5 and 8.
- 8.6 We will share personal information with law enforcement or other authorities if required by applicable law.

- 8.7 We have robust systems in place to store all data securely (see 13.1 Cyber Security)

9 SHARING DATA FOR ANALYSIS AND REPORTING

- 9.1 As Spelling Beats CIC is a Social Enterprise, analysis of the data you provide forms an essential part of the effectiveness of our program. We share this data with charities, LEAs, government education departments and organisations managing or representing schools. Individual teacher and student names are not shared for this purpose. Reports and data analysis are based on aggregated or de-personalised data.
- 9.2 We may also share data with any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, (iii) to enforce our terms and conditions, or (iv) to protect your vital interests or those of any other person

10 PAYMENT CARDS

- 10.1 Schools pay for their subscriptions and merchandise orders using a payment card.
- 10.2 We use Stripe as OUR payment provider for Subscriptions. See <https://stripe.com/guides/general-data-protection-regulation#stripe-and-the-gdpr>. Any payment card number is stored by Stripe and not directly accessible by SpellingBeats.
- 10.3 Shopify. We use Shopify as an eCommerce provider to sell our branded merchandise. See <https://help.shopify.com/en/manual/your-account/privacy/GDPR>.

11 INFORMATION ABOUT YOUR VISITS TO OUR SITES

We automatically gather information about your visits to our sites. This includes demographic data and browsing patterns, but it is only collected in aggregate form – no individual user is identified. This is used to build up marketing profiles, to aid strategic development and to audit usage of the site.

12 COOKIES

Most sites require cookies. They are mostly used to retain what is called your session, this is the state of being logged in on the site. We do not use cookies to store any personal data.

- 12.1 We may use 'cookies' to identify you when you visit the Site to confirm that you are logged in and to build up a demographic profile. A cookie is a small collection of data sent by a web server to a web browser, which allows the server collect information back from the browser.
- 12.2 To help us better understand your needs, we also use 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 the Site but will not store, save or collect personal information. You can read [Google's privacy policy](#) regarding use of cookies for further information.

- 12.3 By using our website, you consent for us to place these cookies on your computer or mobile device.

13 Safeguarding Measures

13.1 Spelling Beats CIC takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place **including:**

- a) No servers or databases are directly accessible over the internet and all webservices are behind Amazon's cloudfront CDN service. Any server access is via an SSH gateway which requires a private key and an additional per-user password is required to make any changes.
- b) Spelling Beats hosts its websites on Amazon Web Service's (AWS) European data centres in Ireland. The Spelling Beats servers in AWS are in a locked-down VPC (virtual private cloud), where access to those machines in the VPC is logically isolated from any other AWS instances.
- c) Data at rest and in transit is encrypted by default and Amazon publish their own security whitepapers around how they handle data
- d) Access to personal data is strictly controlled internally within Spelling Beats with a multi-tiered access hierarchy. Strict care of personal data is part of our safeguarding training for all staff working with or for Spelling Beats. Employees are also periodically trained on the nature and importance of GDPR compliance.
- e) We operate an asset register for company equipment and any data assets with sensitive data. We do not use removable media for sensitive data.
- f) Our protocols are based around the: [National Cyber Security Centre '10 Steps to Cyber Security' Guidance](#)

13.2 Consumer eSafety Awareness

- a) Please note that our Site does not provide pupils with any means to communicate directly with each other. There are no chat rooms connected with our products and services.
- b) You, your teachers and pupils are responsible for keeping your passwords confidential. We ask Users not to share their passwords with anyone.

- c) Users should be aware that unfortunately the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- d) We also expect all our employees and contractors to comply with this Privacy Policy, and we will take appropriate actions to address breaches by employees and contractors of the obligations imposed by this Privacy Policy.
- e) If emailing or writing to us here at Spelling Beats, please do not disclose specific student names and personal information within emails.
- f) If we receive an email from you containing any personal information that breaches with the GDPR, we will respond via a separate email thread and delete the email containing the breach immediately
- g) If we receive paperwork containing personal information that breaches with the GDPR, we will respond to you and shred this immediately.
- h) Please remember to stay up to date with Government Safeguarding Policies: [Keeping Children Safe in Education: Annex C: Online Safety \(Page 96\)](#)

6 TRANSFERS OUTSIDE THE EU

Spelling Beats currently does not transfer or store any personal data outside the UK.

7 CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide some personal information to Spelling Beats; however, without this information, we will not be able to offer some/all of our products.

8 HOW LONG WE KEEP YOUR DATA

- 8.1 Spelling Beats only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.
- 8.2 **Customer organisations: billing details** – records are stored for 6 years following the latest invoice
- 8.3 **Customer organisations: school, school lead, teacher and student details:** Records are stored for 1 year following end of subscription, unless deleted by the school prior to end of subscription.

9 LODGING A COMPLAINT

- 9.1 Spelling Beats only processes your personal information in compliance with this Privacy Policy and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.
- 9.2 The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>

10 CHILDREN AND CONSENT

Please note that children (under the age of 18 years) cannot register to use the Site themselves. A teacher, tutor, or other associated staff member from the school/organisation must register for them (as part of a school subscription) and in doing so is consenting on behalf of the child to provide us with their personal information (as identified above).

11 HOW DO WE COLLECT PERSONAL INFORMATION

The personal information collected about Users broadly falls into the following categories:

11.1 Information that you provide voluntarily

We may obtain personal information directly from you (unless it is unreasonable or impracticable to do so) voluntarily by filling in forms on our Site, or by corresponding with us via phone, email or otherwise. This includes information that you provide when you register an account with us, enter a competition or survey, subscribe to marketing communications from us, and/or to submit enquiries to us.

- 11.2 The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to Users at the point we ask you to provide such personal information.

12 INFORMATION THAT WE COLLECT AUTOMATICALLY

- 12.1 When Users visit our Site, we may collect certain information automatically from their device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.
- 12.2 The information we collect automatically may include information like a User's IP address, device type, unique device identification numbers and login information, browser-type and version, time zone setting, operating system and platform, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how a User's device has interacted with our Sites, including the pages accessed and links clicked, download errors, length of visits to certain pages, page interaction information, and methods used to browse away from any page.

- 12.3 Collecting this information enables us to better understand the Users who come to our Site, where they come from, and what content on our Site is of particular interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Site to our Users.
- 12.4 We collect and record **student scores** as data, based on pre-programmed calculations so that students, teachers and schools can monitor interaction, and progress. Furthermore, the leaderboard helps to create competition between users and classes.
- 12.5 Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading [Cookie Policy](#)

13 INFORMATION THAT WE OBTAIN FROM THIRD PARTY SOURCES

- 13.1 From time to time, we may receive personal information about you from third party sources (including for example, distributors, business partners, affiliates, sub-contractors, payment and delivery services, analytics providers, search information providers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

14 GENERAL

Transfer. We may transfer our rights and obligations under these **Terms of Purchase** to another organisation. We will contact you to let you know. if we plan to do this. You may only transfer your rights or your obligations under these Terms of Website Use to another person if we agree in writing.

23 CONTACT US

If you have any questions about these [Terms of Purchase](#), your Subscription, the [Terms of Website Use](#) and [Privacy Policy](#), please either refer to the help section within the website, or contact us below:
e-mail us: support@spellingbeats.com

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