

Thinking Matters value the trust you give us when providing us with your personal information. We make it our priority to respect your privacy and protect your information using encryption and implementing strict policies that administer how your data is managed.

This privacy policy describes how Thinking Matters Holdings Ltd and/or affiliates, a company registered in England and Wales (registration number: 7698927) ('Company', 'we', and 'our') collects, uses and shares personal data when using our website www.thinkingmatters.com and associated services and subdomains.

In this policy 'you' refers to those who use and/or interact with any or all of our products and/or services and 'we', 'us' and 'our' refer to Thinking Matters. 'Customer(s)' refers specifically to those who use our services.

Please read the following information carefully to understand our practices regarding your personal data.

Contact Details

Our full details are: Thinking Matters Holding Limited, Lower Herdswick Farm, Ogbourne St George, Marlborough, Wiltshire, SN8 1SY.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at: admin@thinkingmatters.com

What is Personal Data?

Personal data is any information about an individual from which that individual can be identified.

The types of personal data we may collect, use, store and transfer consist of the following:

Data Subject	Types of Personal Data
Website visitor / user	<ul style="list-style-type: none">• IP address• Identity Data may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.• Contact Data may include your billing address, delivery address, email address and telephone numbers.• Financial Data may include your bank account and payment card details.• Transaction Data may include details about payments between us and other details of purchases made by you.• Technical Data may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.

Data Subject	Types of Personal Data
	<ul style="list-style-type: none"> • Profile Data may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses. • Usage Data may include information about how you use our website, products and services. • Marketing and Communications Data may include your preferences in receiving marketing communications from us.
Individual contacts at Schools or organisations who have subscribed to use the Service.	Full name, school address, e-mail, telephone number, position within School or organisation
User of the Service (e.g. an individual teacher)	Full name, e-mail address, access credentials, usage data.
Students and pupils whose personal data may be uploaded to the Service or captured by the Service.	Name, class details, sex, special educational needs (SEN) status, disability status, gifted and talented status, pupil premium status, educational attainment information (e.g. progress and results of assessments etc).

We may also process aggregated data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

Who this policy applies to

Unless we say otherwise, the terms of this policy apply to:

- Students, i.e. someone who uses the RoseArchEducation platform;
- Teachers i.e. someone who uses the RoseArchEducation platform in a teaching, administrative or supervisory capacity, for example, to provide opinions, comments, and recommendations for or about students (and review those provided by other teachers), to review students' academic performance, activities, skills, and interactions;
- Parents i.e. a student's parent or guardian who view the platform to explore the opportunities that are available to his/her child, and understand how the platform works;

How do we collect personal data?

We may collect personal data about you from the following sources:

- Information you provide to us via our website;
- Information that is provided to us when you register to use the Service;
- If you are a User of the Service, Information that is provided to us by your School (e.g. to enable you to use the Service);
- Information which is uploaded to or captured by the Service when it is used (e.g. information concerning students and pupils and their educational attainment).

How we use your information and our lawful basis for doing so

We will usually only process your personal data where:

1. the processing is necessary to comply with our legal obligations;
2. the processing is necessary for the performance of a contract (e.g. our Subscription Agreement to use the Service);
3. the processing is necessary for our legitimate interests or the legitimate interests of third parties;
4. the processing is necessary for the exercise or defence of legal claims.

The table below provides examples of the various ways in which we may use personal data and which of the legal reasons we rely on when processing personal data.

Data Subject	Purpose of Processing	Legal Reason for Processing
Website visitor	To assist or improve the individual's use of the website	Legitimate Interests
Individual contact at a School or organisations who has subscribed to use the Service.	To provide the Service for use by the School or organisation; to process payments for Subscription Fees; to enforce the terms of our Subscription Agreement.	Performance of a Contract Legitimate Interests
Individual contact at a School or organisations who has subscribed to use the Service.	If they have consented, to provide them with information about our products and services, promotions and offers.	Consent
User of the Service (such as a teacher)	To provide access to the Service; to improve the Service and the user experience; to	Legitimate Interests

Data Subject	Purpose of Processing	Legal Reason for Processing
	ensure all use of the Service is properly licensed and compliant with our Subscription Agreement.	
Students and pupils (whose personal data may be uploaded to and captured by the Service)	To provide the Service; to improve the Service and the user experience.	Performance of a Contract Legitimate Interests

Where the legal reason for processing is the performance of a contract with you, if you do not provide relevant personal data, we will not be able to fulfil our contractual obligation(s) to you and this may have a detrimental impact on you.

We do not sell or rent personal data which you provide to us.

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission and explain how you can withdraw your consent.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

Who we share your information with

We may have to share your personal data with the parties set out below including:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Keeping your information secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to

know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

How long is your data stored for?

We will not keep your personal data for longer than is necessary for the purpose(s) for which we process it.

This means that data will be destroyed or erased from our systems when it is no longer required.

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.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

For guidance on how long certain data is likely to be kept before being destroyed, contact our Data Protection Representative at admin@thinkingmatters.com

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

These rights include the right to:

- Request access to your personal data – You can find out if we hold any personal information about you, and how we use it by making a 'subject access request'.

If we do hold information about you, we will:

- Give you a description of it.
- Tell you why we are holding and using it, and how long we will keep it for.
- Explain where we got it from, if not from you or your parents.
- Tell you who it has been, or will be shared with.
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person).
- Give you a copy of the information.

You also have the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress.
- Stop it being used to send you marketing materials.
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person).
- Have it corrected, deleted, or destroyed if it is wrong, or restrict our use of it.
- Claim compensation if the data protection rules are broken and this harms you in some way.

If you want to make a request, please contact admin@thinkingmatters.com

You will not 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 may refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than one month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

We do not conduct automated decision making (including profiling) in connection with your personal data.

Who will have access to the data we hold?

1. Our personnel who need to access your personal data will view it in order that we can provide our services to you and provide you with any information you have requested. All our personnel understand the need to keep your personal data confidential and to use it only for legitimate purposes.
2. In addition to our own personnel, other personnel from our service providers may process personal data on our behalf (for example, third party hosting companies; external software developers who assist us to further develop the Service).
3. We may disclose your personal information to third parties:
 - i. if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - ii. if we or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets; and
 - iii. if we are under a duty to disclose or share your personal data in order to comply with legal obligations or to protect the rights, property or safety of others.
4. If your personal data is provided to any third parties, you are entitled to request details of the recipients of your personal data or the categories of recipients of your personal data.
5. We carry out due diligence on our service providers / other third parties and make sure we have a contract with them which satisfies the requirements of data protection legislation.
6. Apart from the situations referred to above, we will not disclose your personal data to a third party without your consent unless we are satisfied that they are legally entitled to access your personal data.

Cookies

You can set your browser to block, disable or delete cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website or Service. For more information about the cookies we use, for our cookie policy click [here](#).

Complaints

We take any complaints about the collection and use of personal information very seriously. If you have any queries about how your personal information is handled, please contact admin@thinkingmatters.com

Alternative, you can make a complaint to the Information Commissioner:

- Report a [concern online](#)
- Call 0303 123 1113
- Email: casework@ico.org.uk
- Or write to: Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF