

OUR STATEMENT OF COMPLIANCE

1.0 - Who we are

Complete Education Solutions Ltd, (Registered Company 10631033, ICO Register of Data Controllers Number ZA788348) and its subsidiaries, is an education software development company working with children and adults in schools and activity clubs throughout the UK.

2.0 - Our commitment to user privacy and data protection

Complete Education Solutions Ltd (also referred to as “CES”, “we”, “us”, “our” in this Privacy Policy) is committed to meeting the highest standards of data protection to provide the best service to our contacts. We will tell our contacts exactly how we will use and store their data; not use it for any purpose other than the ones for which we have a lawful basis; and use appropriate security measures in relation to the data.

Complete Education Solutions Ltd is committed to respecting the personal data you supply us with. The details we store enable us to personalise the service we provide and, with your express consent, to keep you updated with details of courses, camps and services that may be of interest to you. With your consent, we may contact you by post, telephone or email and share this information with pre-agreed third parties to provide information to you about other services and products that we think might be of interest to you. If we want to use the data in this way then we will ask for your consent each time. You have the right to opt out of receiving promotions from us and/or our chosen third parties at any time.

This can be done by emailing us at info@completeeducationsolutions.uk or visiting www.completeeducationsolutions.uk/gdpr If you think any information we hold about you is incorrect you should notify the Data Protection Officer at info@completeeducationsolutions.co.uk.

Any information which is incorrect will be corrected within a month.

3.0 - Relevant Legislation

We process all personal data, including that collected via this website in accordance with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA).

GDPR/DPA outline how organisations must collect, handle and store personal information. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any unauthorised parties.

Users who entrust their personal data to companies like Premier have the following rights under GDPR:

- The right to be forgotten (you can request for your data to be deleted)
- The right to see all the data we hold on you (by submitting a Subject Access Request)

- The right to data portability (if you ask for a copy of all of your data, we'll give it to you in a commonly used format, like a pdf)
- The right to correct inaccurate information we hold on you
- The right to opt-out of marketing communications as easily as you opted in
 - The right to restrict or object to processing (although we may still need to hold on to your data, for example to fulfil a contract)
 - The right to complain (this would be to a supervisory authority responsible for data protection. In the UK, this is the Information Commissioner's Office)

4.0 - Personal Information that this website collects & why we collect it

4.1 Site visitation tracking

When visiting www.completeeducationsolutions.uk, www.schoolipal.co.uk or www.ipeplanner.co.uk, you will be asked to consent to our use of cookies. Cookies are simple text files that a site saves to your computer or mobile device using your website browser. Only the server of that site will be able to retrieve or read the contents of that cookie and each cookie is unique to your web browser. Cookies are either set by the website you are visiting, in which case they are referred to as 'first-party cookies' or are 'third-party cookies' set by other websites and services that run content on the page you are viewing. See our cookie policy for more information.

As with most websites, we use Google Analytics to measure how visitors move through and engage with the website. We use this data to improve our services, for example by measuring which pages people visit before making a purchase and ensuring those pages are optimised to make relevant information easy to find. To opt out of google analytics please click here: <https://tools.google.com/dlpage/gaoptout> Google Analytics records information such as your location, and the device, browser and operating system you are using to view the website ("usage data"). None of this information can be used to identify you.

Google Analytics records - but does not grant us access - to your computer's IP address. For this reason, we treat Google as a third-party data processor (see section 7.0 for more information). We use this data to improve our services, for example by measuring which pages people visit before making a purchase and ensuring those pages are optimised to make relevant information easy to find. The legal basis for this processing is our legitimate interests. Disabling cookies on your internet browser will stop Google Analytics from tracking any aspect of your journey through our website.

4.2 Contact forms and email links

You may provide personal data to us via the forms on our various online contact points. This data is used to perform each contract that we have with you (and to take steps at your request to enter such contracts). It is securely held and stored solely for us on either UKFAST or FASTHOST servers – see Section 5.1, <https://www.ukfast.co.uk/terms/privacy-policy.html> and <https://www.fasthosts.co.uk/terms/policies/privacy-notice> for more information on this. You will only ever receive correspondence from us directly or via a sender authorised by CES, based on the notification settings in your account.

4.3 Email newsletter

Where you give consent, we contact you with a monthly newsletter and periodic additional

communications around specific promotions. Please note that you will need to email us using the email account you want to have removed from our records. You must obtain parental consent before subscribing to our email newsletter if you are under 13 years old.

4.4 School's Data

What information we will hold on schools

We collect personal information about you (such as your name, address, email address or telephone number) when you give this to us as part of becoming a customer, registering for a product, signing up to our newsletters, completing a website form, or making a sales or support enquiry.

When you subscribe to any of our marketing or communications, you indicate that you have a preference to receive these communications. We store your preferences and give you the option to amend these at any time.

As part of using our websites and customer portal, we may also store information about how you use our sites, for example the pages viewed, time spent on each page etc in order to be able to take steps to improve your digital experience. These behaviours including IP addresses are captured within Google Analytics, Power BI and other similar tools.

As an employee of a contracted customer, in order to provide our services to your organisation we may need to collect personal information which data protection legislation defines as **special category data**, such as dietary requirements for an event registration, or screenshots of data within the products you've purchased that we need in order to investigate and resolve a support case. As a customer you agree to the need for us to process this information as part of your organisation's contract with Complete Education Solutions.

How we will use it

We hold contact information (email addresses, postal addresses and phone numbers) for billing purposes. We also retain email addresses in order to contact schools with marketing information which we think will be of interest to them.

How long we'll keep your data

We have the right to retain data which is in the public domain, including school names, addresses, phone numbers and generic email addresses. We will retain pupil data for the lifetime of the school's contract with us. If a school ends their contract with us, we will delete all pupil data for that school within three months of the end of the current academic year.

5.0 - How we store your personal information

5.1 Where your data is stored

If you are a customer our information is stored in our bespoke hosting environment which has its own secure server hosted in the UK with a company called UKFAST (www.ukfast.net). For non-customer-based communication data is held within our own secure server hosted in the UK with a company called FASTHOSTS.

5.2 Sharing or transferring your data

We will only share parents' and children's information with those parties who may need to see it, for example members of staff. We will also share data with one of our resellers if that reseller is responsible for running a child's course.

We'll always tell you before sharing your data with a new third-party or anonymise the data so it can't be linked to you or your child. We will need to share your data with our trusted third-party data processors or within CES.

You can find a list of the third-party processors. These organisations have been selected in part due to their commitment to data security. All are GDPR-compliant as outlined in Section 2. Those based in the USA are also EU-US Privacy Shield compliant. When we transfer data as part of this sharing, we will securely encrypt it before transferring.

Where we use data processors outside the European Economic Area we will only use those who can guarantee the safety of your information and who commit to the terms required by GDPR/DPA. You consent to us transferring your personal data outside the EEA to these data processors.

6.0 - Data Breaches

In the event of an unlawful data breach of this website or any of our data held on third-party data processors, we will inform the Information Commissioner's Officer within 72 hours of the breach, if the rights and freedoms of those individuals whose data has been compromised is at risk. We will inform those individuals of the breach if the data compromised could have a significant negative impact on the individuals concerned (e.g. if it affects their financial or medical data).

7.0 - Data Controller

The data controller of this website is Complete Education Solutions UK, company number 10631033
Registered address & operating office: Fairfield House, 104 Whitby Road, Ellesmere Port, Cheshire
CH65 0AB

8.0 - Data Protection Officer

Our Data Protection Officer's contact information is: Marc Sewell / 033 3577 7321
info@completeeducationsolutions.uk

9.0 - Information Commissioner's Office (ICO)

If you need to contact the ICO to report any issues with the way we have handled your personal data, you contact them through the following channels: Call the helpline: 0303 123 1113 Visit their website: <https://ico.org.uk/> Start a live chat with them: <https://ico.org.uk/global/contact-us/live-chat/>

10.0 - What will happen to your data in the event of an acquisition

In the event of a takeover or acquisition, the personal data we hold will form part of the assets of the organisation and be taken over by the new company, but only used for the same or similar purpose. In these circumstances, we will write to everyone we hold data on and notify them about the change of ownership.

11.0 - Changes to our Privacy Policy

We will continue to review and update this policy in line with the latest industry guidance. This version was last updated in April 2020. Historic versions can be obtained by contacting us.