

# PRIVACY NOTICE FOR SCHOOLS USING HEGARTYMATHS

## STUDENT PRIVACY PROMISE

Being open and honest about our use of your personal information is really important to us, so we have created this **Student Privacy Promise** which provides a quick and simple explanation of how we collect, use and look after your personal information. If you would like to see our full Privacy Notice, which provides a more detailed explanation, you can find it below.

- We receive personal information from your school and use that information to provide HegartyMaths. The information your school shares with us (this is called School Data) is:
  - Your full name
  - Your date of birth
  - Your gender
  - Your unique pupil number (a special number used to identify you)
  - Your class
  - The school you attend
- We also collect personal information when you use HegartyMaths (this is called Usage Data). This includes your answer and results history and the time when you completed questions.
- We use your personal information to provide a HegartyMaths account for you to use to learn maths and give your teachers information about your progress. We cannot provide HegartyMaths without your personal information because we use it to create work which helps you to improve your maths skills.
- We use your personal information to research and improve HegartyMaths for the benefit of all of our users, including you and your classmates. We do this by analysing Usage Data or through research projects.
- We will not share your personal information with anyone other than your school, our support companies (companies who we work with to provide HegartyMaths to you) and the Sparx Family group of companies.
- We protect your personal information by using security measures and controls. We also ensure that our support companies are just as careful with your personal information.
- When you leave your school, we keep your personal information for two years in case it is needed again during this time, however your school can ask us to delete your personal information at any time after you have stopped using HegartyMaths.
- We respect your privacy rights and work with your school to ensure they are protected. If you have any questions about your privacy rights and HegartyMaths, you should speak to your school first and we will help them to respond.

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## Information about HegartyMaths

Sparx Limited (company number 07907042) is the entity responsible for the collection and use of personal information by the HegartyMaths learning technology platform. Sparx Limited is registered as a data controller at the Information Commissioner's Office (**ICO**) with registration number ZA006725. Sparx Limited also operates the Sparx Maths and Numerise learning technology platforms.

## Information about this Privacy Notice

This Privacy Notice is for

- students;
- parents; and
- teachers and other school and (if applicable) Multi Academy Trust (**MAT**) staff (**teachers and other school staff**),

who, or whose children (as applicable), use HegartyMaths. It gives you information about how HegartyMaths collects, uses and protects personal information to deliver our educational technology platform. **It is important that you read this Privacy Notice.**

We may revise our Privacy Notice from time to time. Any changes we may make to our Privacy Notice in the future will be posted on this page, so you will always know what personal information HegartyMaths collects, the purposes we use it for and to whom we might disclose it.

Schools using HegartyMaths are required to provide information to students, parents and teachers and other school staff about HegartyMaths' data processing. As well as this Privacy Notice, please make sure you refer to this information, which will be made available by your school.

**This version of our Privacy Notice for Schools was published in September 2020 and applies to the collection and use of personal information by HegartyMaths from September 2020. It aligns**

with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

If you would like more information about how HegartyMaths uses personal information that is provided directly to us, including through our websites or our social media channels, please refer to our website privacy information which can be found [here](#).

### Why does HegartyMaths use personal information?

HegartyMaths assists teachers and other school staff in delivering comprehensive and personalised maths teaching to their students. To do this, HegartyMaths processes the personal information of students, teachers and other school staff on behalf of schools. Schools using HegartyMaths act as data controllers and HegartyMaths acts as the data processor by providing a service to schools which requires personal information to be processed in order to create work which helps each student to improve their maths skills. HegartyMaths also researches its educational impact through data analysis and specific research projects.

### How does HegartyMaths get personal information?

Schools share personal information about their students, teachers and other school staff with HegartyMaths. HegartyMaths calls this **School Data**. Personal information about students is provided by secure transfer via CSV file upload or directly from the school management information system (**MIS**). Personal information about teachers and other school staff is shared when schools sign-up to HegartyMaths, submit enquiries and support requests or through other communications and through creation of teacher accounts on HegartyMaths.

HegartyMaths also collects personal information when HegartyMaths is being used by students, teachers and other school staff. This is called **Usage Data**.

### What personal information does HegartyMaths collect?

#### Personal information relating to students (Student Data)

##### What Student Data is collected by HegartyMaths?

- **School Data:** Schools securely provide HegartyMaths with Student Data to enable set-up and administration of student accounts and evaluate the progress of the student. This includes information such as a student's name, gender, date of birth, class and unique pupil number. Teachers also input Student Data into their students' user profiles within HegartyMaths, including feedback on work completion.
- **Usage Data:** HegartyMaths gathers information about student activity when they use HegartyMaths in order to optimise student learning. This includes data on student progress and performance in quizzes and questions, the use of HegartyMaths features (such as MemRi) and time spent by the student using HegartyMaths. HegartyMaths also uses data analytics tools and collects information about how and when HegartyMaths is accessed, including the user's IP address, browser type and version, operating system and device.

##### How is Student Data used?

HegartyMaths uses Student Data in order to:

- Set up and administer student accounts;
- Build a profile of each student's performance and progress;
- Provide technical support and deal with help requests and enquiries;
- Provide tailored questions and support;
- Track student usage and provide statistical information on progress;

- Provide reporting to teachers to allow them to monitor student progress and record their actions;
- Conduct research into usage and impact of HegartyMaths and students' educational performance and outcomes;
- Evaluate and improve HegartyMaths; and
- Be de-identified through aggregation and anonymisation.

## Personal information relating to teachers (Teacher Data)

### What Teacher Data is collected by HegartyMaths?

- **School Data:** In order for schools to subscribe to HegartyMaths and in order to set up and administer user accounts, HegartyMaths processes information relating to teachers and other school staff including their name, title, job role, email address, telephone number and teaching classes (if applicable).
- **Usage Data:** To gauge usage, HegartyMaths collects data generated by teachers' activity when using HegartyMaths, including their time spent using HegartyMaths and information supplied by teachers in respect of student attainment. HegartyMaths also collects data generated by teachers from interactions with emails sent by HegartyMaths, including when emails were opened, links clicked and other HegartyMaths activity and uses data analytics and collects information about how and when HegartyMaths is accessed including the user's IP address, browser type and version, operating system and device.

### How is Teacher Data used?

HegartyMaths uses Teacher Data in order to:

- Set up and administer teacher and school staff accounts;
- Provide teachers and other school staff members with access to Student Data;
- Provide teachers and other school staff members with email updates;
- Quantify usage of HegartyMaths,
- Provide technical support and deal with help requests and enquiries;
- Conduct research into usage and impact of HegartyMaths and students' educational performance and outcomes;
- Evaluate and improve HegartyMaths; and
- Be de-identified through aggregation and anonymisation.

## What personal information does HegartyMaths collect for its research projects?

HegartyMaths conducts research in order to evaluate and validate the effectiveness of HegartyMaths. HegartyMaths may share personal information within the Sparx Family group of companies in order to evaluate and improve HegartyMaths. HegartyMaths may also work with other trusted partners whilst conducting research projects. HegartyMaths will de-identify any personal information before it is shared with non-Sparx Family research partners, so that individuals can not be identified.

## What other personal information does HegartyMaths collect?

Students, parents, teachers and other school staff members may choose to contact HegartyMaths via the HegartyMaths website or through HegartyMaths's social media channels. Personal information shared in this way may be shared with schools, support companies and other third parties as necessary. For more information please refer to HegartyMaths' privacy policy for our website and other communication channels ([here](#)).

## Where is personal information stored?

The personal information that HegartyMaths collects will be stored and used in the EEA wherever possible. We will only transfer your data outside the European Economic Area (**EEA**) if it is necessary for us to do so (for example because there are no reasonable alternative support companies based in the EEA). If we have to transfer your personal information out of the EEA, we will ensure protection is afforded to it by ensuring that at least one of the following safeguards is implemented:

- We will only transfer your personal information to support companies in countries that have been deemed to provide an adequate level of protection by the European Commission.
- Where we use certain support companies, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.
- Where we use support companies based in the US, we may transfer personal information to them where they have implemented standard contractual clauses, which requires them to provide similar protection to personal information shared between Europe and the US.
- In the case of all support companies used by HegartyMaths, we undertake detailed due diligence to ensure that each support company has good privacy safeguards and security features in place to prevent unauthorised access to or use of personal information we send it.

A list of the support companies with whom we share personal information in order to operate HegartyMaths can be found [here](#). This list will be updated regularly.

## How does HegartyMaths share personal information?

HegartyMaths shares Student Data with:

- teachers at the student's school; and
- other staff members at the student's school and / or MAT (or other managing organisation i.e. alliances).

HegartyMaths shares Teacher Data with:

- other teachers at the teacher's school; and
- other staff members at the teacher's school and / or MAT (or other managing organisation i.e. alliances).

Student Data and Teacher Data will also be shared with:

- HegartyMaths staff;
- Support companies used by HegartyMaths (details can be found above under 'Where is personal information stored?'); and
- other third parties, if required by law.

HegartyMaths may also disclose personal information with the Sparx Family group of companies or in the event that a third party acquires HegartyMaths or its assets or HegartyMaths enters into any joint venture arrangements. Personal information will never be sold, or used to market or sell non-Sparx Family products or services. HegartyMaths may share non-personal information with third parties (including trusted research partners) provided that information is in an aggregated or wholly anonymised form and that the third party agrees not to attempt to identify individuals from that information.

## How long is personal information stored for and what happens to it?

HegartyMaths does not keep personal information for longer than is necessary. Personal information is used by HegartyMaths whilst the user (i.e. student or teacher) is active. When the user stops using HegartyMaths, their personal information is retained for a period of 24 months from whichever happens first: the end of the academic year in which the account was last active, the end of the school's contract or the user leaving the school. This ensures that user information is not lost and student users can easily pick up where they left off in the event they start using HegartyMaths again within the 24 month period. However, should the school wish for HegartyMaths to anonymise or delete the data before this 24 month period has expired then HegartyMaths is happy to oblige.

After the 24 month period, the user's personal information is anonymised by HegartyMaths. This means all data fields that can be used to identify an individual are removed, so that only non-identifiable information remains. This information is not classed as personal information, and can be retained indefinitely by HegartyMaths.

### How non-personal information is used

HegartyMaths uses anonymised, non-personal information for researching the results achieved through the use of HegartyMaths and participation in research projects. With permission, data aggregated at school level may be shared between other schools, MATs and alliances. Non-personal information may also be used for marketing HegartyMaths to prospective users.

### Security of personal information at HegartyMaths

HegartyMaths is committed to protecting and respecting privacy. HegartyMaths has appointed a Data Protection Officer who advises on, and oversees matters relating to, privacy and data security. Appropriate measures have been put in place to prevent personal information from being lost, used or accessed without authorisation and we conduct regular penetration testing. HegartyMaths limits access to personal information to only those employees and support companies who have a legitimate need for access. They will only process personal information in accordance with our instructions and will be subject to a duty of confidentiality.

### Cookies

In order to provide HegartyMaths via a web browser, we place cookies on users' devices. Cookies are used to collect standard internet log and user behaviour information. This information is used to arrange the content of HegartyMaths websites, ensure security, track usage of HegartyMaths and compile statistical reports. These cookies are **not** used to target users of HegartyMaths with online advertising. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org).

### Your rights

Your rights in relation to your personal information are:

1. The right to be informed of processing.
2. The right to access personal information by making a subject access request.
3. The right to rectification where personal information is inaccurate or incomplete.
4. The right to erasure, sometimes called 'the right to be forgotten'.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object to processing.
8. The right not to be subject to a decision based solely on automatic processing.

Your rights do not apply in all instances. Please contact your school if you have any requests or questions relating to your rights. HegartyMaths will assist schools with upholding your rights in circumstances where it is legally required or it is possible to do so.

You also have the right to make a complaint at any time to the ICO regarding the collection and use of personal information by HegartyMaths. However, we would appreciate being given the chance to help you with your concerns before you approach the ICO, so please contact us using the details below in the first instance. For more information about the ICO please visit <https://ico.org.uk/for-the-public/>

### How to contact us

Questions, comments and requests regarding personal information that we hold, or regarding this Privacy Notice, are welcomed and should be addressed to [privacy@hegartymaths.com](mailto:privacy@hegartymaths.com). Alternatively, please contact The Data Protection Officer, Sparx Limited, Oxygen House, Grenadier Road, Exeter, Devon EX1 3LH.

**For schools who are located in the EU only:** We have appointed IT Governance Europe Limited to act as our EU representative for the purposes of GDPR. Should you have any privacy queries, you can contact us directly by emailing [privacy@hegartymaths.com](mailto:privacy@hegartymaths.com) or via our EU representative by emailing [eurep@itgovernance.eu](mailto:eurep@itgovernance.eu). Please include our company name (Sparx Limited) in any correspondence you send to our EU representative.