

# White Rose Education Services Limited (trading as White Rose Maths)

## Privacy Policy

### INTRODUCTION

White Rose Education Services Limited (trading as White Rose Maths) (“**White Rose Maths**” or “**we**”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit either of our websites at [whiterosemaths.com](http://whiterosemaths.com) or [resources.whiterosemaths.com](http://resources.whiterosemaths.com) (“**our Websites**”) (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you, including how we comply with the General Data Protection Regulation (“**GDPR**”) and other related legislation which relates to the use of personal data.

This privacy notice is divided into sections so you can navigate through to the specific areas set out below. Alternatively you can download a pdf version of the **policy** [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice. We also operate cookies on our website and information about that is provided separately in our [Cookie Policy](#).

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## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how White Rose Maths collects and processes your personal data through your use of our Websites, including any data you may provide through our Websites when you sign up to our newsletter, sign up for one of our events, complete a website form, purchase a product or service or take part in a competition.

Our Websites are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other statements or fair processing notices we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using

your data. This privacy notice supplements those other notices and is not intended to override them.

## **CONTROLLER**

For the purposes of our Websites and the information collected through them, White Rose Education Services Limited (trading as White Rose Maths) is the data controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

## **CONTACT DETAILS**

Our full details are:

Full name of legal entity: White Rose Education Services Limited (trading as White Rose Maths)

Name or title of data privacy manager: Anne-Marie Holdsworth

Email address: [dataprotection@whiterosemaths.com](mailto:dataprotection@whiterosemaths.com)

Head Quarters: Trinity Academy Halifax, Shay Lane, Halifax, HX2 9TZ

Postal Address: White Rose Maths, Maltings Road, Halifax, HX2 0TJ

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR OBLIGATIONS**

This version was last updated on 15.03.2020 and historic versions can be obtained by contacting us.

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

If you provide us with information about any other person, for example any other individuals within your organisation, then you must ensure that you have their consent to pass those details to us and for us to use those details in accordance with this privacy policy. You should also make sure that you bring this privacy policy to their attention.

## **THIRD-PARTY LINKS**

Our Websites may include links to third-party websites, plug-ins and applications. For example, we provide links to our social media pages, to our partners' websites, such as TTS or Pearson, and, if you book a training event advertised on our website, you may be transferred to the website of a third party booking provider, such as Eventbrite, to complete

your booking. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Websites, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Websites.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you or the organisation you represent, or for another lawful reason and you fail to provide

that data when requested, we may not be able to perform our obligations in accordance with the contract we have or are trying to enter into with you (for example, to provide you with goods or services), provide you with the information you require, or otherwise properly deal with your request. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - register for, or purchase, our resources;
  - fill out the “Get in Touch” form on our website;
  - sign up for one of our events via a link on the ‘upcoming events’ section of our homepage, or the ‘Training and Events’ page of our website;
  - attend one of our events;
  - create an account on our website;
  - subscribe to our newsletter;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey;
  - give us some feedback; or
  - request a product or service demo.
- **Third party booking providers such as Eventbrite.** When you book to attend one of our events, for example via the ‘Upcoming Events’ section of our homepage, or the ‘Training and Events’ page of our website, you may complete your booking and payment through one of our third-party booking providers. The third-party booking provider will collect your personal data including your Contact Data, and Financial Data and may then provide us and/or a third-party event organiser with your Contact Data to facilitate management of attendees and administration of the event.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using **cookies**, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our **Please see our [Cookie Policy](#) for further details.**
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers, such as Google, which may be based outside the UK or European Economic Area (“**EEA**”);

(b) advertising networks such as Google and Facebook, which may be based outside the UK or EEA;

(c) search information providers such as Google, which may be based outside the UK or EEA.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services, which may be based outside the UK or EEA.
- Identity and Contact Data from data brokers, aggregators or suppliers such as Sharpspring (or their authorised resellers, such as Perfect Circle), which may be based outside the UK or EEA.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register, which may be based inside or outside the UK or EEA (as applicable).

## 4. HOW WE USE YOUR PERSONAL DATA

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

See the table below, to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing [support@whiterosemaths.com](mailto:support@whiterosemaths.com)

### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please *Contact us* if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|------------------|--------------|--------------------------------------------------------------------|
|------------------|--------------|--------------------------------------------------------------------|

|                                                                                                                                                                                                                                                                                                           |                                                                                    |                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new customer                                                                                                                                                                                                                                                                         | Identity<br>Contact                                                                | Performance of a contract with you                                                                                                                                                                                                                                                |
| To register you for and make arrangements for you to attend one of our events which you have signed up for, including through one of our third-party booking providers, such as Eventbrite.<br>Following the event, to send any training materials to you, for example copies of any presentation slides. | Identity<br>Contact<br>Marketing and<br>Communications                             | Necessary for our legitimate interests (to administer and provide our training events to you and to send you course materials thereafter)<br><br>Performance of a contract with you                                                                                               |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us                                                                                                                                                                               | Identity<br>Contact<br>Financial<br>Transaction<br>Marketing and<br>Communications | Performance of a contract with you<br>Necessary for our legitimate interests<br>(to recover debts due to us)                                                                                                                                                                      |
| To manage our relationship with you which will include:<br>notifying you about changes to our terms or privacy <b>policy</b> , and asking you to leave a review or take a survey                                                                                                                          | Identity<br>Contact<br>Profile<br>Marketing and<br>Communications                  | Performance of a contract with you<br>Necessary to comply with a legal obligation<br>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)                                                                    |
| To enable you to partake in a prize draw, competition or complete a survey                                                                                                                                                                                                                                | Identity<br>Contact<br>Profile<br>Usage<br>Marketing and<br>Communications         | Performance of a contract with you<br>Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)                                                                                                            |
| To administer and protect our business and our Websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)                                                                                                                                   | Identity<br>Contact<br>Technical                                                   | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>Necessary to comply with a legal obligation |
| To ensure our third-party service providers can perform their obligations to us.                                                                                                                                                                                                                          | Identity<br>Contact<br>Technical<br>Profile<br>Usage                               | Necessary for our legitimate interests in ensuring that our third-party service providers such as IT providers, external consultants and contractors are able to provide those services.                                                                                          |

|                                                                                                                                              |                                                                                         |                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To transfer personal data to third parties for the proper operation of our business.                                                         | Identity<br>Contact<br>Technical<br>Profile<br>Usage<br>Marketing and<br>Communications | Necessary for our legitimate interests, for example, to transfer to third parties to whom we may choose to sell, transfer, or merge part of our business or our assets. If a change happens to our business, the new owners may use your personal data in the same way as set out in this policy. |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | Identity<br>Contact<br>Profile<br>Usage<br>Marketing and<br>Communications<br>Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)                                                                                                                             |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences                           | Technical<br>Usage                                                                      | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)                                                                                       |
| To make suggestions and recommendations to you about goods or services that may be of interest to you                                        | Identity<br>Contact<br>Technical<br>Usage<br>Profile                                    | Necessary for our legitimate interests (to develop our products/services and grow our business)                                                                                                                                                                                                   |

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

From time to time, we may use your Identity Data, Contact Data, Technical Data, Usage and Profile Data and Marketing and Communications Data to contact you with information about our products or services. You will receive marketing communications from us if you have requested information from us or have purchased goods or otherwise agreed to be included on our marketing list.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any entity outside the White Rose Maths group of companies for marketing purposes.

### **Opting-out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [Contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **CHANGE OF PURPOSE**

We will only use your personal data 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 compatible with the original purpose. If you would like further information about how we use personal data and the purpose which we might use it for, please [Contact us](#).

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the following parties for the purposes set out in the table in paragraph 4 above:

- Internal Third Parties as set out in the *Glossary at paragraph 10 below*.
- External Third Parties as set out in the *Glossary at paragraph 10 below*.
- Specific third parties listed in the table in *paragraph 4*

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Some of our External Third Parties are based outside the European Economic Area (“EEA”) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

For example, we use Google Analytics which is provided by Google and Marketing Automation services provided by SharpSpring, both of which are based in the US, and which are part of Privacy Shield.

Please [Contact us](#) if you want further information on the other specific mechanisms used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

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. 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.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, tax 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.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please visit the Glossary for further information about your legal rights concerning each category below.

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*

- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [Contact us](#)

## **NO FEE USUALLY REQUIRED**

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.

## **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 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.

## **TIME LIMIT TO RESPOND**

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

# **10. GLOSSARY**

## **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#)

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **THIRD PARTIES**

## INTERNAL THIRD PARTIES

Other companies in the White Rose Maths Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

## EXTERNAL THIRD PARTIES

- Service providers acting as processors who may be based in the United Kingdom, EEA, USA or elsewhere outside of the EEA who provide IT, marketing and system administration services.
- Event organisers if you are attending one of our events, which is to be held at a third-party venue.
- Professional advisers acting as processors or joint controllers including lawyers, marketing consultants, bankers, auditors and insurers based in the United Kingdom who provide consultancy, marketing, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.