

## Privacy Policy

Last modified: July 16, 2024

This Privacy Policy governs Sprint Media Limited's ("we", "us" or "our") data collection, processing, and usage practices. It also describes your choices regarding use, access, and correction of your personal information. By using our website, you consent to the data practices described in this Privacy Policy and you consent to our use of cookies. If you do not agree with the data practices or the use of cookies described in this Privacy Policy, you should not use our website.

We may update this policy from time to time by publishing a new version on our website so you should check this page periodically to ensure you are happy with any changes to this policy.

### 1. HOW WE USE PERSONAL DATA

#### 1.1 Legal Basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

#### 1.2 The Types of Personal Data We Collect

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

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

- **Usage data:** We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website

navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics and HubSpot. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- **Service data:** We may process your personal data that is provided in the course of the use of our services ("**service data**"). The service data may include your name, email address, postal address, service preferences, and basic financial information. The source of the service data comes from you when you provide it to us in the course of a negotiation or sale. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- **Enquiry data:** We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. We may also process information relating to how you have interacted with our website and any marketing we have sent you in order that we may send you relevant communications. The legal basis for this processing is consent.
- **Transaction data:** We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details, and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- **Notification data:** We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- **Correspondence data:** We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business, and communications with users.

### 1.3 The Establishment, Exercise, or Defence of Legal Claims

We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise, or defence, of legal claims, whether in court

proceedings or in an administrative, or out-of-court, procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

## 2. PROVIDING PERSONAL DATA TO OTHERS

We may share your personal data where necessary with the parties set out below, for the purposes set out in Section 1.

- **Our group companies:** We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company, and all its subsidiaries) insofar as is reasonably necessary for the purposes set out in this policy.
- **Our professional advisors:** We may disclose your personal data to our insurers and/or professional advisers insofar as is reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice, and managing legal disputes.
- **Our technical providers:** We may disclose your personal data to our data centre, telephony, and server administration providers insofar as is reasonably necessary for the safe and efficient storage of your data.
- **Our payment providers:** Financial transactions relating to our website and services may be handled by our payment services providers, PayPal, Stripe, GoCardless, and Wise. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds. You can find our payment provider's privacy policies in the following places:

Paypal: <https://www.paypal.com/myaccount/privacy/privacyhub>

Stripe: <https://stripe.com/gb/privacy>

GoCardless: <https://gocardless.com/privacy>

Wise: <https://wise.com/gb/legal/global-privacy-policy-en>

- **Our productivity and communication application providers:** We may disclose your personal data while using our internal productivity and communication applications insofar as is reasonably necessary for the purposes of proper administration of our website and business.

### 2.1 For Compliance with a Legal Obligation

In addition to the specific disclosures of personal data set out in this Section 2, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### 2.2 Sale, Transfer or Merger

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

### **2.3 Acknowledgement of Personal Data Submitted for Publication**

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

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.

## **3. INTERNATIONAL TRANSFERS OF PERSONAL DATA**

In this Section 3, we provide information about the circumstances in which personal data may be transferred to countries outside the European Economic Area (EEA).

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, 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.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Xero (our accountancy software provider is based in New Zealand but holds data in the United States), Atlassian, Slack, HubSpot, and Help Scout are all based in the United States and hold data there.

You can find information about their privacy policies in the following places:

Xero: <https://www.xero.com/uk/about/legal/privacy>

Atlassian: <https://www.atlassian.com/legal/privacy-policy>

Slack: <https://slack.com/intl/en-gb/privacy-policy>

HubSpot: <https://legal.hubspot.com/privacy-policy>

Help Scout: <https://www.helpscout.net/company/privacy>

## **4. RETAINING AND DELETING PERSONAL DATA**

This Section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

### **4.1 Length of Retention**

The periods for which we keep your information depend on the purpose for which your information was collected and the use to which it is put. We will only retain your personal

data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Section 6 YOUR RIGHTS below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **5. SECURITY OF PERSONAL DATA**

### **5.1 Appropriate Measures**

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.

In the event of a suspected personal data breach, where legally required to do so, we will notify you and any applicable regulator of the breach.

Some of the steps that we take to protect your personal data include:

- **Secure storage:** We will store all your personal data on secure servers, personal computers, and mobile devices, and in secure manual record-keeping systems.
- **Password storage:** Any passwords you provide us will be stored by us in encrypted form.
- **Financial transactions:** Data relating to financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

### **5.2 Acknowledgement of You Transmitting Unencrypted Data**

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of that data sent over the internet.

### 5.3 Campus User Passwords

If you are a Campus user you should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing Campus confidential and we will not ask you for your password (except when you log in to Campus).

## 6. YOUR RIGHTS

In this Section 6, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

### 6.1 Principal Rights

Your principal rights under data protection law are:

- **Right to access:** You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- **Right to rectification:** You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- **Right to erasure:** In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data has been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defence of legal claims.
- **Right to restrict processing:** In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; or you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- **Right to object to processing:** You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- **Right to object to direct marketing:** You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- **Right to object to processing for scientific or historical research:** You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- **Right to data portability:** To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- **Right to withdraw consent:** To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

## 6.2 How to Exercise Your Principal Rights

You may exercise any of your rights in relation to your personal data by written notice to us at [guy@sprint-education.com](mailto:guy@sprint-education.com) or to the postal address as published in this Privacy Policy.

## 6.3 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.

## 6.4 Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

## **6.5 Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

## **7. THIRD PARTY WEBSITES**

Our website includes hyperlinks to, and details of, third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **8. PERSONAL DATA OF CHILDREN**

This website is not intended for children and we do not knowingly collect data relating to children.

If we have reason to believe that we hold personal data of a person under the age of 18 in our databases, we will delete that personal data.

## **9. ACTING AS A DATA PROCESSOR**

In respect of our Campus users' CRM module data, we do not act as a data controller; instead, we act as a data processor. Insofar as we act as a data processor rather than a data controller, this policy shall not apply. Our legal obligations as a data processor are instead set out in the contract between us and the relevant data controller.

## **10. OUR DETAILS**

### **10.1 This Website**

This website is owned and operated by Sprint Media Limited.

### **10.2 Our Company Registration**

We are registered in England and Wales under registration number 6177833, and our registered office is B1 The Courtyard, Tewkesbury Business Park, Tewkesbury, GL20 8GD.

### **10.3 Our Place of Business**

Our principal place of business is B1 The Courtyard, Tewkesbury Business Park, Tewkesbury, GL20 8GD.

### **10.4 Contact Methods**

You can contact us:

- by post, using the postal address given above;
- by telephone, on 01684 297374 or the contact number published on our website from time to time;



- by email, at [guy@sprint-education.com](mailto:guy@sprint-education.com) or using the email address published on our website from time to time.

#### **10.5 Data Protection Registration**

We are registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is ZA143246.

#### **10.6 Data Protection Officer**

Our data protection officer's contact details are: Guy Lewis ([guy@sprint-education.com](mailto:guy@sprint-education.com)), Sprint Education, B1 The Courtyard, Tewkesbury Business Park, Tewkesbury, GL20 8GD.