



## Privacy Policy

Last modified: September 16, 2024

This Privacy Policy governs Sprint Media Limited's ("we", "us", "our" or "Sprint") data collection, processing, and usage practices with respect to our website users and customers. It also describes your choices regarding use, access, and correction of your personal information. Personal information means any information about an individual from which that person can be identified, including name, address, telephone number, and email address. This term also includes "personally identifiable information," "personal data," or similar terms under applicable data privacy laws, rules, or regulations.

By using our website or signing up for our services, 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 and our Cookie Policy, <https://www.sprint-education.com/legal/cookie-policy>, you should not use our website.

Our customers may collect and manage Personal Data when using Campus, or what we may refer to as the Platform. "Platform" is defined in the Campus Terms and Conditions here: <https://www.sprint-education.com/legal/campus-terms> and means all our web-based applications, tools and platforms that you have subscribed to under an Order Form or that we otherwise make available to you, and are developed, operated, and maintained by us.

This Privacy Policy does not apply to any of the personal data our Campus users add or import into the Platform. The collection and processing of our customers' data is governed by the contract between us and our customer where we act as a data processor, not a data controller. Our customers' respective privacy policies govern the collection and use of any data they import or add to Campus.

This Privacy Policy also does not apply to any publicly available data or personal data we collect related to teachers, staff, and other educators at education institutions. Please refer to our Education Staff Privacy Policy for additional information.

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 it. If we make any material changes to this policy, we will notify you by updating the policy on this page and as otherwise required by law.

### 1. LEGAL BASIS FOR PROCESSING PERSONAL DATA (EEA AND UK RESIDENTS ONLY)

If you are a website visitor or client located in the European Economic Area ("EEA") or United Kingdom ("UK"), Sprint Media Limited is the data controller of your personal data.

The law requires us to have a legal basis for collecting and processing 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.

## 2. PERSONAL DATA WE COLLECT AND PROCESS

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

### Information You Provide

- **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 such as purchase order numbers, invoice numbers, and bank reference numbers (sort codes, account number, IBAN, SWIFT codes). The source of the service data comes from you when you provide it to us in the course of a negotiation or sale.
- **Enquiry data:** We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**").
- **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 and the details of the transaction. Your credit card number and other financial information are processed by one of our secure payment processors.
- **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**").
- **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.

### Information We Collect and Process When You Use the Subscription Service

- **Through the Platform Gmail Integration:** By enabling the Gmail integration within Campus, you consent to granting Campus access to specific data from your Google account. Campus will have the capability to send emails from your Gmail account. We access and use Google account data solely for the purpose of enabling transactional email functionality through Gmail. We do not use this data for any other purposes.

Campus will continue to store various email-related data, including email headers, subject lines, distribution lists, aliases, timestamps, and email bodies.

Please be aware that your emails may contain sensitive information, including contact names, personal communications, or financial and medical details. You acknowledge that the correspondences you track may be visible to other users who have been granted access to the platform by your admin user.

- **Platform usage data:** We gather data on how you and your Campus users engage with the Platform. This data covers various metrics and details about your activity, including which product features are used most frequently, the timestamps of actions like logging in, and the frequency of specific features being activated within your account.

#### Information Collected Automatically

- **Website 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.
- **Technology data:** through cookies, beacons, and other technologies ("**Technologies**") that we and third parties place on your browser or device, we, as well as our third-party providers of Technologies, may collect information about your online activity through your use of our services and/or after you leave our services. For more information about any of these Technologies or to learn how to opt-out, please refer to the Cookie Policy <https://www.sprint-education.com/legal/cookie-policy>. For more information on your privacy options, please refer to Section 8 YOUR PRIVACY RIGHTS AND CHOICES below.
  - **Cookies:** When you visit the website, we collect information automatically using tracking technologies, like cookies and tracking pixels.
  - **Advertising:** We partner with third party vendors, including Google and Facebook, to serve ads to you based on your visits to our partners' websites and other sites.
  - **Email communications:** We may send you correspondence, transactional, and marketing emails and employ a common software technology called beacons or use a unique code to track email clicks. Beacons are 1px x 1px graphics with a unique identifier, similar in function to cookies, and are used to track if you have opened an email. We use these in our emails to let us know which emails have been opened by recipients. The unique code to track email clicks allows us to determine whether a recipient has clicked on a link in an

email. These technologies allow us to gauge the effectiveness of certain communications, and the effectiveness of our marketing campaigns.

### **Information Collected from Other Sources**

We may collect certain business contact information about you from company websites, LinkedIn, and other publicly available sources. This information includes name, job title(s), business email address(es), and business phone number(s).

### **Do Not Track Signals**

Some browsers allow you to automatically transmit a Do Not Track signal to websites and other online services you visit. However, because there is no industry standard as to such signals, we do not currently recognize or respond to browser-initiated Do Not Track signals. We respond to legally recognized browser-based opt out signals such as the Global Privacy Control signal for California and Colorado residents.

## **3. HOW WE USE PERSONAL DATA**

We may disclose aggregated information about users and information that does not identify any individual without restriction.

We use the personal data we collect about you or that you provide to us for the following purposes:

- To present our website and services to you, including to monitor and improve both the website and our services.
- To provide you with information, products, or services that you request from us, including to customize our communications with you and to send you relevant notifications and/or marketing communications.
- To enter into and perform a contract with you, including to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our website, our services, or any products or services we offer or provide through it. Some of the ways we may market to you include email campaigns, postal advertisements or “targeted advertising” through the use of cookies. If you have any questions about our marketing practices, you may contact us at any time at [data@sprint-education.com](mailto:data@sprint-education.com) or via the Contact Us information in Section 0 below.
- To conduct general business, accounting, recordkeeping, backup, and legal functions in support of our operations.
- To protect against and identify fraud or other criminal activity, and for other security purposes for our website and services.

- To establish, exercise, or defend legal claims, whether in court proceedings or in an administrative, out-of-court procedure, or for other protection and assertion of our legal rights and the legal rights of others.
- For other legitimate business purposes.
- For any other purpose with your consent.

#### 4. HOW WE SHARE PERSONAL DATA

We may share your personal data where necessary with the parties set out below, for the purposes set out in Section 30. We require all our service providers 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.

- **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.

### **Advertising Partners**

We may share the technology data with third-party advertising partners such as Google and Facebook through the use of cookies and other Technologies as described above in Section 2 and in our Cookie Policy. These third-party advertising partners may use those Technologies to collect information regarding your activities and your devices (such as IP address, or cookie identifiers). These advertising partners may use this information for purposes of delivering personalized advertisements to you when you visit digital properties within their networks, which is frequently referred to as “targeted advertising” or “cross-context behavioural advertising.” We share this information to deliver you information about our products and services. You can learn how to opt-out of this sharing by consulting our Cookie Policy <https://www.sprint-education.com/legal/cookie-policy> or in Section 8 YOUR PRIVACY RIGHTS AND CHOICES below.

### **For Compliance with a Legal Obligation or for Other Legal Reasons**

- In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- We may also disclose personal data if we have a good-faith belief it is reasonably necessary to enforce applicable Terms of Use or Service, including any investigation into potential violations.
- We may disclose personal data to detect, prevent, or otherwise address fraud, security, or technical issues.
- We may disclose personal data to protect against harm to the rights, property, or safety of Sprint, our users, or the public.

### **Sale, Transfer or Merger**

We may also disclose publicly available or personal data to an actual or potential buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which publicly available or personal data held by us is among the assets transferred.

### **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.

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

Certain third-party service providers referenced in this Privacy Policy, with whom we have contractual agreements, operate in countries that may not offer the same level of privacy and data protection as the laws in the country in which you reside.

For individuals in the EEA, Switzerland, or the UK whose personal data we transfer, we ensure 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.
- Through mutual agreement of the European Commission-approved Data Privacy Framework Standard Contractual Clauses.
- Where we use certain service providers, we may use specific contracts approved for use in the EEA, Switzerland or the UK which give personal data the same protection it has in the UK.

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

This Section 6 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.

### **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 or if required for other legal purposes.

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 certain periods of time after they cease being customers for tax or legal purposes.

In some circumstances you can ask us to delete your data: see Section 8 YOUR PRIVACY RIGHTS AND CHOICES 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.

## 7. SECURITY OF PERSONAL DATA

### 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.

### 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.

### 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 the Platform confidential and we will not ask you for your password (except when you log in to the Platform).

## 8. YOUR PRIVACY RIGHTS AND CHOICES

In this Section 8, we have summarised the rights that you may 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.

Depending on where you live, you may have the following rights with respect to your personal data:



## Residents of the UK and the EEA

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.

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.

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 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.

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.

**Residents of California, Colorado, Connecticut, Delaware, Iowa, Montana, New Hampshire, New Jersey, Oregon, Utah, and Virginia (now or in the future) may have rights to:**

- Confirm whether we process their personal data, including the categories of personal data collected, the sources of personal data, the purposes for processing personal data, and the categories of third parties with whom we share personal data or to whom we sell personal data. Oregon residents may request a list of specific third parties, other than natural persons, to which we have disclosed personal data.
- Access and delete certain personal data, subject to certain exceptions.

- Correct inaccuracies in their personal data, taking into account the processing purpose of the data.
- Data portability. With respect to the personal data we have collected, we will provide this information in a portable and, if technically feasible, readily usable format.
- Opt-out of personal data processing for:
  - Targeted advertising;
  - Sales; or
  - Profiling in furtherance of decisions that produce legal or similarly significant effects.
- Colorado and California residents may also turn on the Global Privacy Control to opt out of any personal data processing for targeted advertising that is browser based for each participating browser system used.
- Either limit (opt-out of) or require consent to process sensitive personal data. We do not collect or process sensitive personal data, so this right is not available.

### **How to Exercise Your Rights and Choices**

The scope of these rights may vary state by state. To opt out of personal data processing for targeted advertising, please click the **Do Not Sell or Share My Personal Information** link <https://www.sprint-education.com/legal/do-not-sell-or-share> and fill out the form. To opt-out of any commercial email or to opt-out of cookies, please consult the Cookie Policy <https://www.sprint-education.com/legal/cookie-policy> or use the information in the Contact Us (Section 0) to opt-out. For commercial email, you may also click the unsubscribe/opt-out/manage preferences links in the bottom of any email you receive from us. You may also exercise any of these rights by contacting us using the Contact Us information (Section 0) at the bottom of this Privacy Policy. To appeal a decision regarding a rights request, please email [data@sprint-education.com](mailto:data@sprint-education.com).

We will not discriminate against you for exercising any of the above rights. We will not deny you goods or services, charge you different prices or rates for goods or services, including through the use of discounts or other benefits or by imposing penalties. We may, however, charge a reasonable fee or refuse to act upon a request if the request is excessive, repetitive, unfounded, or overly burdensome.

Depending on the type of request, we may request information from you in order to confirm or verify your identity. We may do so by asking for additional information to compare against the personal data we hold about you, such as email address, phone number, or other contact information we may have on file for you, or if you have an account with us, by asking you to log in to that account. We will only use this additional information to verify your identity or authority to make the request. We may also ask you to provide additional detail or clarify your request to properly understand, evaluate, and respond to it.

You may authorize someone as an agent to submit a rights request on your behalf. You may provide that person with a power of attorney or signed, written permission to submit requests on your behalf, but we will still require you to verify your identity with us directly by one of the methods

listed above. We will also require your authorized agent to verify their personal identity via one of the above methods.

### **Additional Notices for Residents of California**

The following section only applies only to California consumers and the Personal Information of California consumers. Any capitalized terms not defined in this Privacy Policy have the same meaning given to them in the California Consumer Privacy Act (“CCPA”).

We do not “sell” (as defined by the CCPA) your Personal Information covered by this Privacy Policy to any third parties. We may “share” your Personal Information for “cross-context behavioral advertising” as described below and as described in Section 4 above. We also disclose Personal Information to our service providers or business partners who have agreed to our contractual limitations as to the retention, use, and disclosure of such Personal Information.

We explain the categories of information we collect and the sources of that information in Section 2 above, the purposes for which we collect and use personal data in Section 3, and how we share your personal data in Section 4 above. We will retain personal data in accordance with the principles set forth in Section 6 above.

We have disclosed the following categories of Personal Information (as defined in the CCPA) in the past twelve (12) months to service providers or contractors for a business purpose:

- Identifiers such as name, email address, mailing address, IP address, unique personal identifier.
- Personal information categories listed in California Customer Records Statute (Cal. Civ. Code § 1798.80(e)), such as name, address, telephone number, employment information (such as job title and employer name), other financial information such as bank sort codes/account numbers/IBAN/SWIFT codes, username or email address in combination with a password or security question and answer that would permit access to an online account (for users of our Campus product only).
- Commercial information, such as subscription records, purchase records, and records of other products or services considered on our website.
- Internet or network activity, such as records on your interaction with a website, application, or advertisement.

We’ve “shared” the following categories of Personal Information with third parties for “cross-context behavioral advertising”:

- Identifiers such as IP address and unique personal identifier.
- Commercial information, such as records of products or services considered on our website.
- Internet or network activity, such as records of your interaction with a website, application, or advertisement.

### *Opt-Out Rights for California Residents*

We do not knowingly “sell” or “share” the Personal Information of children under 16.

You have the right to direct us not to “share” your Personal Information (“opt-out”) on a going-forward basis.

You may opt out of this “sharing” by contacting us using the Contact Us information in Section 0 below, by enabling the Global Privacy Control in your browser, or by clicking the Do Not Sell or Share My Personal Information link here: <https://www.sprint-education.com/legal/do-not-sell-or-share>.

#### *“Shine the Light” Disclosure*

We do not disclose your Personal Information covered by this Privacy Policy with third parties for their direct marketing purposes.

### **9. 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.

### **10. 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.

### **11. OUR DETAILS**

#### **This Website**

This website is owned and operated by Sprint Media Limited.

#### **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.

#### **Our Places of Business**

- Our UK place of business is B1 The Courtyard, Tewkesbury Business Park, Tewkesbury, GL20 8GD.
- Our US place of business is 1007 N. Orange St., 4<sup>th</sup> Floor, Suite 1280, Wilmington, Delaware, 19801.

#### **Data Protection Registration**

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

**Data Protection Officer**

Our data protection officer's contact details are: Guy Lewis (guy@sprint-education.com).

**Contact Us**

If you have any questions about this Privacy Policy or to exercise any of your privacy rights or choices, you can reach us via the following methods:

- Email: data@sprint-education.com or using the email address published on our website from time to time.
- UK Mailing address: Sprint Education, B1 The Courtyard, Tewkesbury Business Park, Tewkesbury, GL20 8GD.
- US Mailing address: Sprint Education, 1007 N. Orange St., 4<sup>th</sup> Floor, Suite 1280, Wilmington, Delaware, 19801.