



---

## Data Protection & Privacy Policy

### 1. Introduction

The purpose of this policy is to explain how ML trading as My Learning (UK) Ltd collects, protects, and uses personal data. ML is committed to ensuring that any personal data supplied by its Clients or is otherwise generated by its business activities is collected and processed fairly and lawfully. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

#### 1.1 Who are we?

We are My Learning (UK) Ltd. Our address is Suite 3 Kingsland House, Stafford Court, Telford, TF3 3BD. You can contact us by post at the above address, by email at: [support@mylearningltd.com](mailto:support@mylearningltd.com) or by telephone on +44 (0)845 154 3211.

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above.

### 2. What types of personal data does ML collect?

ML needs certain personal data to enable it to provide its products and services to its Clients and end users. The personal data collected will generally include: Forename, Surname, DOB, Gender and Email Address. ML will also collect logs of verification checks made. In certain circumstances ML may also collect additional information from end users to enable enhanced features of our products. This additional information is optional, and only used within our products and never circulated to 3<sup>rd</sup> parties. Although access and technical logs are collected they are only stored for a limited period and only accessible to ML qualified staff.

### 3. How does ML obtain personal data

ML obtains personal data in a number of ways mainly from the School Management Information System. In some occasions data is collected by users registering manually for our services. We also collect limited data from our website for the purposes of product enquiries.

### 4. How does ML use the personal data it holds?

#### 4.1 Providing and Improving the ML Service

Most of our services require the use of basic personal data which is necessary to enable us to provide a service to our Clients and our end users, including the personalisation of your experience, support and communication services. In addition, ML may also use personal data to improve on the level and type of service ML offers to its Clients. As part of this interest in

*My Learning (May 18)*  
*#GDPRPP rev:3*



---

improving the service provided, ML may process personal data for the purposes of technical analysis and Client usage statistics.

#### **4.2 Direct contact**

ML may from time to time inform its Clients, end users and potential Clients about important updates and future plans for the product. This is known as “Direct contact”, and ML may contact our Clients and end-users through email or the product to notify you of such information.

If you wish to opt-out of such communications and no longer be informed of product updates and feature improvements, please see Paragraph 9 for details on how to do this.

#### **4.3 Third Party Data Collection**

ML use first party cookies (such as Google Analytics cookie) to report on how ML is used by Clients which allows us to monitor and improve our service to you. It is important to note that ML does not collect any identifiable or personal information at all through this system, and it is only used to collect statistics on patterns of use and to monitor the performance of our services.

Clients may opt out of Google’s use of cookies by visiting the Google advertising opt-out page.

### **5. Does ML transfer personal data overseas?**

ML is provided globally from many different countries, so depending upon where you access the service from, your data may be processed elsewhere. To fulfil our Client service obligations, it is necessary for ML to transfer and process personal data outside the country in which the personal data is collected. This will include transfers to the United Kingdom. All such data transfers are encrypted, firewalled and only accessible to our qualified team at ML.

#### **5.1 Maintenance of information**

ML shall retain your personal data in accordance with all applicable laws and remain consistent with the purpose in collecting your personal data and may be stored on one or more databases directly maintained by ML. We employ industry standard security measures to protect the confidentiality of the information. Although ML cannot guarantee that any loss, misuse or alteration of data will not occur; every effort is made to prevent such occurrences.

### **6. To whom does ML disclose personal data?**

ML will pass personal data within its internal departments in order to fulfil sales and support obligations as well as to finance departments to enable invoicing.

As a general rule, ML does not disclose personal data to any third parties except where Client consent has been obtained, where ML is under an obligation by law to disclose personal data or where ML has contracted with third parties to assist in providing services to ML Clients. Such third parties may include data extraction companies who work with your school already, or support services within your school.

*My Learning (May 18)*  
*#GDPRPP rev:3*



---

## 7. How does ML protect the personal data it holds?

ML takes Client confidentiality and security very seriously. ML has implemented appropriate internal security procedures that restrict access to and disclosure of personal data within ML. These procedures are reviewed from time to time to determine whether they are being complied with and are effective.

ML does not use any of the Clients personal information for the purpose of marketing. The data we hold does not include any of the items below:

- interest or participation in adult activities (including alcohol, gambling, adult dating, pornography, etc.)
- sexual behaviour or orientation
- racial or ethnic information
- political affiliation
- trade union membership or affiliation
- religion or religious belief
- financial status or situation
- the commission or alleged commission of any crime

ML will also actively investigate and cooperate with law enforcement agencies any allegations of abuse or violation of system or network security as set out in our Acceptable Use Policy and EULA.

### 7.1 Your responsibility

You are responsible for the security of your login and password. Make sure you keep it in a safe place and do not share it with others. Always remember to log out after your session ends, to ensure that others cannot access your private personal information. You should take this precaution even if you are not using a public computer, such as at a library or internet café, but even when using your private computer in your home.

## 8. Clients' Rights

### 8.1

The law in certain jurisdictions (including countries within the European Economic Area) gives individuals whose personal data is held by ML specific rights to access and rectify personal data held about them. These include the right to:

#### 8.1.1

obtain from ML confirmation that personal data is held, as well as a written description of such personal data, the purpose(s) for which it is being used, the source(s) of the personal data and details of any recipients;

#### 8.1.2



---

request the deletion or rectification of personal data which is inaccurate; and inaccurate; and

### **8.1.3**

as explained in paragraph 4.2 above to object to any unsolicited information sent by ML regarding products and services.

## **8.2**

“Personal data” is information about an individual that could, alone or together with other information personally identify that individual. Information such as full name, address, email address and telephone number are examples of Personal data. Dynamic I.P addresses and anonymous log data will not be classed as personal data.

## **9. Contact Details**

If any individual wishes to contact ML regarding the personal data held about them or has any other question about data privacy procedures, they should direct an email to [support@mylearningltd.com](mailto:support@mylearningltd.com) or send a letter to the direction of “Data Guidance” at the companies official address on this notice.

## **10. Your right to complain**

If you have a complaint about our use of your information, you can contact the Information Commissioner’s Office via their website at <http://www.ico.org.uk/concerns> or write to them at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

You can also telephone 0303 123 1113 (local rate) or 01625 545745 (national rate).

## **11. Policy Updates**

As part of ML’s commitment to compliance with data privacy requirements, and to reflect changes in ML’s operating procedures, ML may update the terms of this policy from time to time.