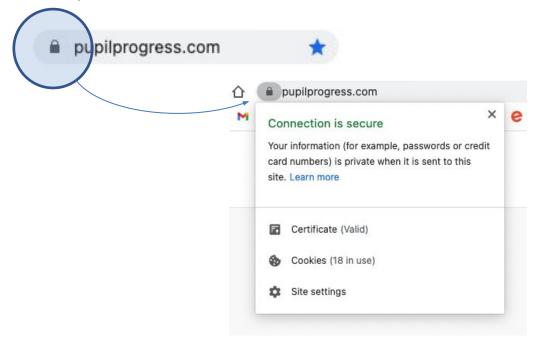


Our Approach

Trust is integral to our service. We understand the demand on school leaders to ensure that their staff and students information is kept secure and safe. That is why we at Pupil Progress do everything we can to make sure that we meet and exceed the guidelines for General Data Protection Regulation (GDPR). All of the details of our approach to ensuring that we provide a safe and reliable service to our customers can be found in the full Data Processing Agreement, but we thought it might be helpful to share with you some of the key points to ensure we meet your privacy and security needs.

Key Points

- ✓ We are ICO registered & meet all their requirements: ZA226391
- ✓ We meet the Data Protection Act 2018 requirements & security obligations and are bound by UK law
- ✓ We will never share or sell our customer or student data with third parties
- ✓ All our data is encrypted and secure, both when at rest and in transfer, as shown by the Secure symbol on the web browser:



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Types of data we collect to use

- ✓ Contact details
- ✓ Information we get from other systems
- Information that identifies users
- Information on how your users use Pupil Progress

How we use your data

- ✓ To provide you with an online, classroom management system for learning and teaching in lessons, including controlling access to applications and the internet.
- ✓ To monitor and provide information/evidence about what learners are doing during and outside of lessons, which may indicate possible safeguarding issues.
- ✓ To send nominated staff information about possible safeguarding issues.
- ✓ To keep Pupil Progress running and improve the existing service and tools.
- ✓ To give personalised customer support.

Sub-processors and partners who process your data

Pupil Progress uses the following services to help us store and process your data on our behalf:

- ✓ Infrastructure: Amazon Web Services, FRAM
- Analytics: Hubspot
- ✓ Integrations: Hubspot, Stripe*
- ✓ Comms: Hubspot, Google

*Only used as part of our business account management and included for transparency.

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Exam Board Specific Tracking for all Subject Areas.



We use cookies

- ✓ We use only necessary cookies to run and improve the service.
- ✓ We use only necessary cookies to run and improve how we manage our customer relationship with you.
- Our third-party service providers use cookies too, which they control.
- You can turn off cookies but this will mean, for example, that we can't recognise you in in-app functions or we can't resolve issues so efficiently.

When and how we collect data (Am I included?)

We collect data from people browsing our website, Pupil Progress customers and people who view or obtain support through Pupil Progress when...

Data You (the customer) Provide	Data users (Logged in staff members) provide	Data we (Pupil Progress) collect	When
X			When you create staff accounts
X	X		When you provide information about learners to identify and group them
	X	X	You access sections of the platform
X	X	X	You chat with us for customer support
	X	X	You receive emails or notifications from us
X	X		You provide additional information about learner attainment and behaviour

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Exam Board Specific Tracking for all Subject Areas.



Further Information

To access the full Terms of service, Privacy Policy and Data Protection Agreement use the links below. Both of which can be found on any page of the website and web app when logged into the software

- ✓ Terms of Service
- Privacy Policy
- ✓ <u>Data Protection Agreement</u>

Helping you support user rights

All users have to come through your organisation to make use of their rights. To support that, we make sure that:

- ✓ You can access information we hold for you.
- ✓ You can ensure information is held for you.
- ✓ You can complain about us.

If you have any concerns about your data's privacy at Pupil Progress, please get in touch via our contact form or email us at info@pupilprogress.com

Further Questions

If you have further security and data protection queries we will be happy to help. We thrive on feedback, so please do let us know if there are any aspects of our approach that you feel we need to improve.

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