

# CHECKINSCHOOLS PRIVACY POLICY

## INTRODUCTION

Welcome to the Privacy Policy of CheckInSchools (“**We**”/“**Us**”/“**Our**”). We respect the privacy of you, your school and your pupils (“**You**”/“**Your**”/“**Yours**”) and are committed to protecting your sensitive personal data (“**Personal Data**”). This Privacy Policy will inform You as to how we look after your Personal Data when You visit our website (“**Site**”) (regardless of where you visit it from) and tell You about Your privacy rights and how the law protects You.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the Privacy Policy here: [\[LINK\]](#).

Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

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## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how We collect and process Personal Data through Your use of this website (“**Services**”), including any data You may provide through the Services when You visit the Site, register a user account to use the Services,

It is important that you read this Privacy Policy together with our Terms of Use which can be accessed here [\[URL TO TERMS OF USE\]](#) so that you are fully aware of how and why We are using your data.

## **OPERATOR**

“CheckInSchools” is a trading style of CHECKIN LTD of 20-22 Wenlock Road, London, N1 7GU.

We are the Data Processor as defined in the General Data Protection Regulation 2016/679 (“**GDPR**”) and any successor legislation having legal effect in the United Kingdom. For the purposes of the Services, the school is the Data Controller and the school staff members and school pupils are the Data Subjects.

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise Your legal rights in relation to how We process your data, please contact our Data Privacy Manager using the details set out below:

Data Manager  
CHECKIN LTD  
20-22 Wenlock Road  
London  
N1 7GU  
Email: <mailto:support@checkinschools.com>

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 whose website is at the following link: [www.ico.org.uk](http://www.ico.org.uk). However, We shall be grateful if you will please give Us the chance to address with Your concerns with You directly before you approach the ICO. You should therefore contact Us directly if You have any concerns or complaints.

## **CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our Privacy Policy under regular review. This version was last updated on 21/082018. 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.

## **PROCESSING OF CHILDREN’S PERSONAL DATA**

Our Services are aimed at institutional customers e.g. schools and education authorities. Children cannot register to use the Site independently. A teacher must register on behalf of the pupils and in doing so is consenting on behalf of the child (including on a trial basis) for their Personal Data to be collected. It is the responsibility of the institutional customer to register children as users of the Site and obtain the appropriate consent as Data Controller.

While we do not impose a minimum age restriction to using the Site, the school has the responsibility of ensuring that the pupil users understand the Site and the Services and consent for their Personal Data to be collected and processed depending on their emotional maturity and the level of their receptive and expressive language skills.

The school is responsible for obtaining and confirming the necessary parental consent for all pupil users. Users who do not give this consent (or who do not have this consent provided on their behalf) cannot use the Site.

Please note by registering with Us, using Our Service, by providing the requested Personal Data, whether on a trial or ongoing basis, You consent to us processing your of Personal Data by Us for the purpose of fulfilling our contractual obligations to You via CheckInSchools and administering Your account.

Student users with account usernames and passwords should be aware that all teacher users within a single institutional group in the password protected portion of the Site have the ability to view all pupil users' dashboards and personal information. Pupils are unable to see other Pupils' dashboards and Personal Data irrespective of whether or not they are members of the same institutional group.

While we strive to protect Your Personal Data, We cannot guarantee absolute security, no method of data transmission over the Internet nor electronic storage of data is 100% secure. By using our Services, You acknowledge, understand and accept the risk that data and information transmitted over the Internet is susceptible to error or security breaches and that any transmission is at Your own risk.

You, Your colleagues and pupils and their parents and legal guardians are responsible for keeping Your usernames and passwords confidential. We require users not to share their passwords with anyone.

We process pupils' Personal Data in accordance with Recital 38 of the GDPR by making Our Services easy for children to understand and use. Our on-screen messages are written as far as possible in plain English so that child users understand what data they are given Us, how it will be used and who else will have access to it.

We conduct regular Data Protection Impact Assessments (“**DPIA**”) to assess and mitigate data protection risks to pupils users.

If You believe that any aspect of Our Services is confusing to children and they may not understand the importance of the Personal Data that they are giving or how it will be used, We encourage You to contact Us with Your feedback. We continually evaluate Our Services and welcome constructive criticism in this respect.

## **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 collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** which includes first name, last name, username or similar identifier.
- **Contact Data** which includes, school address and email address.

- **Transaction Data** includes details about payments to and from You and other details of products and services You have purchased from Us. After you make payment, this data is not retained and stored by 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 this website.
- **Profile Data** includes Your username and password, feedback and survey responses.
- **Usage Data** includes information about how You use Our Site and Services.
- **Marketing and Communications Data** includes Your preferences in receiving marketing from Us and Your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from Your Personal Data but is not considered Personal Data in law as this data will **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 Policy.

Please note that we do not process Your financial data. This is processed by Stripe Payments Europe Limited (“**Stripe**”) whose privacy policy can be viewed [here](#). There is the possibility that Stripe will transfer your Personal Data outside of the UK and EEA.

## **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, and You fail to provide that Personal Data when requested, We may not be able to perform the contract We have or are trying to enter into with You (for example, to provide You with goods or services). In this case, We may have to cancel our Services 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 through:

- **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 Services;
  - create a user account on Our Site;
  - subscribe to Our Services;

- give Us feedback or contact Us.
- **Automated technologies or interactions.** As you interact with Our Services, We will 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 cookies. **Please see Our Cookies Policy [LINK] for further details.**
- **Third parties or publicly available sources.** We will receive Personal Data about You from various third parties and public sources (but only where these third parties have Your consent or are otherwise legally permitted or required to disclose Your personal information to Us) as set out below.
  - Technical Data from the following parties:
    - (a) analytics providers such as Google based outside the EU;
    - (b) search information providers.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe based outside the EU.

#### 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 obligation.

Click here **[LINK TO GLOSSARY, LAWFUL BASIS]** to find out more about the types of lawful basis that We will rely on to process Your personal data.

#### 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 Our 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register You as a new customer	(a) Identity (b) Contact	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	(a) Identity (b) Contact (c) Financial (d) Transaction  Please note that no transactional details are stored by CheckInSchools	(a) Performance of a contract with You (b) Necessary for our legitimate interests (to recover debts due to Us)
To manage our relationship with You which will include: (a) Notifying You about changes to our terms or Privacy Policy (b) Asking You to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with You (b) Necessary to comply with a legal obligation (c) Necessary for Our legitimate interests (to keep Our records updated and to study how customers use Our products/services)
To administer and protect Our business and Our Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To use data analytics to improve our Site, Services, customer relationships and experiences	(a) Technical (b) 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)

### **THIRD PARTIES AND MARKETING**

We do not share Your data with any third parties for marketing purposes whatsoever.

The school users may share pupil users' data with External Third Parties such as Social Services, a pupil's parents/legal guardians and General Practitioner where they deem it necessary to protect the health and safety of the pupil-users.

## **COOKIES POLICY**

A cookie is a little piece of information handed to a web browser from a web server that contains information that can be retrieved from the server later. When you visit the Site the server may attach a cookie to your computer's memory. We use cookies only in two ways; (i) to maintain the user session - this is so when requests are made back to the server we know who is using the system and can ensure they have the right access levels. (ii) To ensure we have a secure connection and no one is trying to write to the database from a page not provided by the server. We have to use cookies to make the system work.

To help us better understand your needs, we also use analytical software. This software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the Site, but will not store, save or collect personal information. You can read [Google's Privacy Policy](#) regarding use of cookies for further information.

You can set Your browser to refuse all or some browser cookies, or to alert You when websites set or access cookies. If You disable or refuse cookies, please note that some parts of this Site may become inaccessible or not function properly.

## **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 wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, 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 share Your personal data with the parties set out below for the purposes set out in the table [\[Purposes for which we will use your personal data\]](#) above.

- Internal Third Parties as set out in the [\[Glossary\]](#).
- External Third Parties as set out in the [\[Glossary\]](#).
- 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.

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**

We do not transfer Your Personal Data outside the United Kingdom. Our Virtual Private Service (“VPS”) is based in London, England and is firewall-enabled and has encryption software in place.

Please note that Our payment processing partner, Stripe, may transfer Your Personal Data out of the UK and the EEA. We refer You to Stripe’s privacy policy available [here](#).

If You are accessing Our Service from outside the UK, it is likely that Your personal information is transferred to, and processed in, a country different to the country in where You are resident. Your country’s data protection laws may well be different to that of the UK. We have taken appropriate safeguards to require that Your personal information will remain protected in accordance with our Privacy Policy. In order to register and use Our Service You must read and agree to our Terms of Use and Privacy Policy.

## **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**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

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 Your Legal 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.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, You have rights under data protection laws in relation to Your Personal Data. Please click on the links below to find out more about these rights:

- [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 Your consent.](#)

If You wish to exercise any of the rights set out above, please contact Us our Data Privacy Manager using the contact details given above.

### **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 can 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 respond to all legitimate requests within one month. If it will take Us longer than a month due to Your request being particularly complex or You have made a number of requests, 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 obligation** means processing Your Personal Data where it is necessary for compliance with a legal obligation to which that We are subject.

### THIRD PARTIES

#### EXTERNAL THIRD PARTIES

- Service providers acting as processors based the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, 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.
- Social Services, the National Health Service and a pupil's parents/legal guardians and General Practitioner.

### 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 Personal Data We hold about You corrected, though We may need to verify the accuracy of the new Personal 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:

- If You want Us to establish the data's accuracy.
- Where Our use of the data is unlawful but You do not want Us to erase it.
- 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.
- 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 the Services to You. We will advise You if this is the case at the time You withdraw Your consent.