



EDClass Privacy Policy

POL078

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Approved by Sam Warnes

EDClass Privacy Policy

EDClass Ltd ("EDClass", "we", "us", or "our") takes the privacy of our customers, partners, school staff, and learners very seriously.

Please read the following policy to understand how we collect, process, manage, and safeguard your Personal Data through your use of our distribution channels. These distribution channels include our website (www.edclass.com), the EDClass web platform, our official mobile applications (iOS and Android), and associated educational service portals.

EDClass Ltd is committed to safeguarding your privacy. If you have any questions or concerns regarding the use of your Personal Data, contact us at enquiries@edclass.com. All personal data is processed strictly in accordance with United Kingdom data protection legislation.

Definitions and Interpretation

In this Privacy Policy, the following definitions are used:

- ✓ **Data:** Collectively all information that you submit to EDClass Ltd via the Website, Web Platform, or Mobile Applications. This incorporates definitions provided in the Data Protection Laws.
- ✓ **Personal Data:** Any information relating to an identified or identifiable natural person.
- ✓ **Processing:** Any operation or set of operations performed on Personal Data, whether automated or manual (such as collection, recording, storage, adaptation, retrieval, consultation, use, disclosure, or erasure).
- ✓ **Data Subject:** A natural person whose Personal Data is being processed.
- ✓ **Data Protection Laws:** Any applicable law relating to the processing of Personal Data, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), and any successor legislation.
- ✓ **Data Controller / Data Processor:** As defined in the UK GDPR.
- ✓ **Cookies:** Small text files placed on your computer or device by our Website or Web Platform when you visit or interact with specific features.
- ✓ **EDClass Ltd / We / Us:** EDClass Ltd, a company incorporated in England and Wales (Company Registration No. **12612936**), whose registered office is at **Aston House, Campbell Way, Dinnington, Sheffield, South Yorkshire, S25 3QD**.
- ✓ **Mobile Applications (Apps):** The official EDClass iOS and Android applications distributed via the Apple App Store and Google Play Store.
- ✓ **User / You:** Any third party that accesses the Website or Mobile Applications who is not employed or directly contracted by EDClass Ltd acting in the course of their employment.
- ✓ **Website:** The website that you are currently using, www.edclass.com, and any of its sub-domains.

Scope and Roles (Controller vs. Processor)

This Privacy Policy applies to the actions of EDClass Ltd, visitors to our Website, and authorised users of our Web Platform and Mobile Applications.

- ✓ **EDClass as a Data Controller:** For general website visitors, direct sales inquiries, billing contacts, newsletter subscribers, and internal infrastructure logging/security, EDClass Ltd acts as the **Data Controller**.
- ✓ **EDClass as a Data Processor:** When delivering educational alternative provision, attendance tracking, lesson content, and safeguarding tools to schools, multi-academy trusts (MATs), and local authorities, EDClass acts as a **Data Processor** on behalf of the educational institution (the **Data Controller**).

Data Protection Principles

We strictly adhere to the fundamental principles established under UK GDPR:

- ✓ **Lawfulness, Fairness, and Transparency:** Processing is carried out on legitimate statutory grounds with clear communication.
- ✓ **Purpose Limitation:** Data is collected solely for specified, explicit, and legitimate educational and business purposes.
- ✓ **Data Minimisation:** We collect only the minimum amount of data required.
- ✓ **Accuracy:** We maintain procedures to ensure that personal data remains accurate and up to date.
- ✓ **Storage Limitation:** Data is retained only for as long as necessary to fulfil its designated purpose or statutory record-keeping requirements.
- ✓ **Integrity and Confidentiality:** We implement rigorous technical and organisational measures to ensure end-to-end security.

Data We Gather

A. Data Provided to Us Directly by You

- ✓ **Contact and Inquiries:** Name, job title, school/organisation, business email address, phone number, and message contents submitted via web forms, phone, post, or email.
- ✓ **Commercial Details:** Payment details, billing addresses, and order histories for institutional subscriptions.
- ✓ **Account Registration:** Login credentials created for access to demonstration portals or support services.
- ✓ **Marketing Preferences:** Your opt-in choices for receiving updates, webinars, and educational newsletters.

B. Data Collected Automatically via the Website

- ✓ **Technical and Usage Data:** IP addresses, browser types and versions, operating systems, time zone settings, referral sources, page interaction patterns, and access dates/times.
- ✓ **Cookies and Session Identifiers:** Automated session identifiers, cache states, and interface preferences (detailed in Section 9).

C. Website Contact Forms and External Tools

- ✓ **Contact Forms:** Information submitted via website contact forms is stored securely within the website database and transmitted to internal management systems.
- ✓ **Zoho CRM:** We utilise Zoho CRM to manage incoming institutional inquiries and support requests. Data entered into contact forms may be synchronised with Zoho CRM in compliance with strict data processing terms.
- ✓ **LiteSpeed Cache / QUIC.cloud:** Our website uses LiteSpeed caching and QUIC.cloud networks to ensure high performance and uptime. Temporary cached snapshots of pages are stored securely and purged on automated schedules.

Data Collection via the EDClass Mobile Applications (iOS and Android)

The EDClass mobile applications process limited personal and technical data strictly necessary to provide secure mobile access to EDClass alternative provision, safeguarding records, and communication services.

Information Collected by the Mobile App:

- ✓ **Account and Profile Information:** Username, full name, email address, internal user ID, profile image, assigned system roles, permissions, and (where included in your authorised institutional profile) date of birth, gender, and pronouns.
 - ✓ *Purpose:* Identifying authorised users, applying role-based access controls, displaying accurate profiles, and delivering authorised educational services.
- ✓ **Authentication Data:** Usernames and encrypted credentials transmitted securely during sign-in. Plaintext passwords are **never** stored on the device.
 - ✓ *Purpose:* Establishing authenticated sessions, managing password changes, and preventing unauthorised account takeover.
- ✓ **Device and Notification Identifiers:** Push notification tokens, unique device/installation identifiers, device model, operating system version, app build version, selected environment, device locale, and time zone.
 - ✓ *Purpose:* Routing essential push notifications to the correct device, managing active installations, and diagnosing delivery failures.
- ✓ **In-App Assistant Messages:** Text entries and questions submitted to the integrated EDClass Assistant.
 - ✓ *Purpose:* Generating contextual learning responses, supporting lesson progress, and maintaining active conversation threads requested by the user.
- ✓ **Notification State:** Read/unread status and notification IDs.

- ✓ *Purpose:* Synchronising alert states across mobile devices and the core EDClass platform.
- ✓ **Firestore Cloud Messaging and Installations:** The app utilises Firestore infrastructure services solely to route push notifications reliably.
 - ✓ *Purpose:* Push notification delivery and diagnostic monitoring. Firestore data is not linked to personal identities for tracking, nor used for marketing.

Data NOT Collected by the Current Mobile App:

The EDClass mobile application:

- ✓ Does **not** use personal data for commercial advertising or third-party marketing.
- ✓ Does **not** engage in cross-app or cross-website tracking.
- ✓ Does **not** deploy Firestore Analytics, Firestore Crashlytics, or Firestore Performance trackers.
- ✓ Does **not** collect or monitor real-time GPS location data.
- ✓ Does **not** access your device address book or contacts.
- ✓ Does **not** read health, medical, or fitness data.
- ✓ Does **not** process or collect payment/banking details through the app.
- ✓ Does **not** record, publish, or upload camera/microphone streams directly from the mobile device in its current implementation.

(Note: The mobile application may display safeguarding logs, timetables, or learner data originating from authorised institutional EDClass platform services).

Legal Bases for Processing (UK GDPR)

We process your data under the following lawful grounds:

- ✓ **Performance of a Contract:** Fulfilling our service agreements with schools, multi-academy trusts, local authorities, and registered users.
- ✓ **Compliance with a Legal Obligation and Safeguarding:** Fulfilling statutory safeguarding requirements under UK education law (including *Keeping Children Safe in Education*), preventing fraud, and adhering to financial reporting standards.
- ✓ **Legitimate Interests:** Administering client accounts, securing infrastructure against cyber threats, improving service performance, diagnosing technical faults, and communicating relevant service updates to institutional clients.
- ✓ **Consent:** Where you have explicitly opted in to receive direct marketing communications or accepted non-essential website cookies. You may withdraw consent at any time.

EDClass Ltd does not sell, rent, or trade personal data collected through any website or mobile application

Who Else Can Access Your Personal Data?

We only share personal data with trusted third parties under strict confidentiality and data protection agreements:

- ✓ **Your Educational Institution:** School leaders, designated safeguarding leads (DSLs), and authorised educators managing student placements.
- ✓ **Vetted Infrastructure Partners:** Secure cloud hosting facilities, backup repositories (e.g., encrypted Amazon S3, Google Cloud infrastructure), and notification delivery providers (Firebase).
- ✓ **Legal and Statutory Authorities:** UK law enforcement bodies, local authority safeguarding teams, or regulatory agencies where we are under a legal or statutory safeguarding duty to disclose information.

Data Security and Storage

We implement rigorous technical and organisational measures to safeguard your Data:

- ✓ **Encryption:** All data in transit across our website, platform, and mobile applications is encrypted using modern Transport Layer Security (TLS/HTTPS). Database backups are encrypted using industry-standard hashing and encryption protocols.
- ✓ **Access Restrictions:** Role-based access controls ensure that personnel access only the data necessary to perform their duties.
- ✓ **Perimeter Defence and Web Security:** We deploy web application firewalls to monitor and prevent malicious brute-force attempts and unauthorised system access. Firewall logs process connection IP addresses, access timestamps, and browser user-agent strings.
- ✓ **Hosting and Jurisdiction:** All primary servers, platform databases, and student records are securely hosted within the United Kingdom.

Cookies and Tracking Technologies

The EDClass website uses cookies to improve user experience, maintain authenticated sessions, and understand how visitors interact with our content.

- ✓ **Strictly Necessary Cookies:** Essential for website navigation, security, and account login.
- ✓ **Functionality Cookies:** Remember your display preferences, language settings, and interface choices.
- ✓ **Analytical Cookies:** We use Google Analytics to measure aggregate website traffic and visitor trends. Google processes this information anonymously in accordance with their privacy policies. You can opt out via browser extensions or the [Google Analytics Opt-out Browser Add-on](#).

You can control, block, or delete cookies via your browser settings. For comprehensive cookie management information, visit allaboutcookies.org.

Data Retention

- ✓ **General Website Inquiries:** Retained for the duration of the commercial relationship or up to 24 months following the last active communication.
- ✓ **Educational and Alternative Provision Records:** Maintained in accordance with the specific data retention schedule established with the contracting school/local authority and applicable UK educational record-keeping guidelines.
- ✓ **Financial and Transaction Records:** Retained for statutory periods (typically 6–7 years) as required under UK tax and corporate legislation.
- ✓ When personal data is no longer required, it is either permanently deleted using secure erasure methods or irreversibly anonymised.

Your Data Protection Rights

Under UK Data Protection Law, you (and, where applicable, your legal guardians) have the following statutory rights:

- ✓ **Right of Access:** Request confirmation of processing and obtain a copy of your personal data.
- ✓ **Right to Rectification:** Request correction of inaccurate or incomplete personal data.
- ✓ **Right to Erasure ("Right to be Forgotten"):** Request deletion of data where there is no overriding legal or safeguarding reason to retain it.
- ✓ **Right to Restriction of Processing:** Request that we restrict processing under specific circumstances.
- ✓ **Right to Object:** Object to processing based on legitimate interests or direct marketing.
- ✓ **Right to Data Portability:** Request transfer of your data to another organisation in a structured, machine-readable format.
- ✓ **Right to Withdraw Consent:** Withdraw previously granted consent at any time without affecting prior lawful processing.

To exercise any of these rights, please contact our Data Protection Officer at enquiries@edclass.com.

Changes of Business Ownership and Control

EDClass Ltd may, from time to time, expand, restructure, or sell all or part of our business. Where user data is relevant to any transferred division, it will be transferred under the terms of this Privacy Policy, and the new controller will be bound to use the data only for the purposes for which it was originally collected.

Regulatory Supervisory Authority

If you are not satisfied with how EDClass Ltd handles your personal data, you have the right to lodge a complaint with the UK supervisory authority:

The Information Commissioner's Office (ICO)

- ✓ **Website:** <https://ico.org.uk>
- ✓ **Helpline:** 0303 123 1113
- ✓ **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact Us and Policy Updates

We reserve the right to modify this Privacy Policy to reflect operational enhancements, new app features, or legislative changes. Any updates will be published immediately on this page.

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