



EDClass Mobile Application Privacy Policy

POL079

Issue number 2

Approved by Sam Warnes

EDClass Mobile Application Privacy Policy

This Privacy Policy applies specifically to personal and technical data collected, processed, and managed through the **EDClass Mobile Application** (available on iOS and Android), operated by **EDClass Ltd** ("EDClass", "we", "us", or "our").

EDClass provides online alternative provision, safeguarding, and remote educational services to schools, multi-academy trusts, local authorities, and learners.

This policy outlines how our mobile application handles user data in strict compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant app marketplace privacy standards.

Data Controller and Roles

- ✓ **Data Processor:** For school-enrolled learners, teachers, and school administrators, EDClass acts as a **Data Processor** on behalf of the partnering school or local authority (the **Data Controller**).
- ✓ **Data Controller:** For direct support queries, operational infrastructure logs, and account security management, EDClass acts as a **Data Controller**.

Information We Collect

We limit the collection and processing of personal and technical data strictly to what is necessary for authentication, security, platform features, and reliable educational service delivery.

Account and Profile Information

- ✓ **Data Types:** Username, full name, email address, internal user ID, profile image, assigned system roles, access permissions, and (where present in your authorised EDClass profile) date of birth, gender, and pronouns.
- ✓ **Purpose:** To identify authorised users, apply role-based access controls, display accurate user profiles, and deliver educational content aligned with your institution.

Authentication Data

- ✓ **Data Types:** Username and encrypted credentials.
- ✓ **Purpose:** To verify identity during login, establish authenticated secure sessions, handle password recovery, and prevent unauthorized account access.
- ✓ **Storage Standard:** Plaintext passwords are never stored locally on your device or in unencrypted format.

Device, Installation, and Notification Data

- ✓ **Data Types:** Push notification tokens, unique installation identifiers, device model, operating system version, app release version, environment settings, device locale, and time zone.
- ✓ **Purpose:** To map notification tokens to verified accounts, deliver essential platform alerts, manage application state, and troubleshoot message delivery failures.

Interactive Assistant Messages

- ✓ **Data Types:** Text entered into the in-app EDClass Assistant.
- ✓ **Purpose:** To process user queries, generate contextual learning responses, and maintain active conversation threads requested by the user.

Notification and Activity State

- ✓ **Data Types:** In-app notification identifiers and read/unread status.
- ✓ **Purpose:** To ensure inbox state, activity logs, and read receipts remain synchronized between the app and the core EDClass platform.

Third-Party Infrastructure Data (Firebase)

- ✓ The app utilises **Firebase Cloud Messaging** and **Firebase Installations** solely to manage push notification delivery and maintain reliable device communication.
- ✓ These services process non-identifying technical tokens. EDClass does not link Firebase diagnostics to individual identities for behavioural tracking or advertising.

Data We Do NOT Collect

The EDClass mobile application is built strictly for educational access and safeguarding. We **do not**:

- ✓ Collect or monetise data for commercial advertising or third-party marketing.
- ✓ Perform cross-app or cross-website tracking.
- ✓ Integrate Firebase Analytics, Firebase Crashlytics, or Firebase Performance monitoring.
- ✓ Access, track, or monitor real-time GPS location from your device.
- ✓ Request access to your personal contacts or address book.
- ✓ Access personal health, medical, or fitness data.
- ✓ Collect credit card, bank, or payment details.
- ✓ Upload, stream, or record camera or microphone data directly from the device in the current release.

(Note: The app may display timetabled video/audio sessions, safeguarding records, or learner profiles that originate directly from authorised institutional EDClass web services).

Legal Basis for Processing (UK GDPR)

We process personal data under the following legal bases:

- ✓ **Contractual Necessity / Public Task:** To deliver educational alternative provision and platform services established between EDClass and your school/local authority.
- ✓ **Legal Obligation & Safeguarding:** To uphold statutory safeguarding duties, student wellbeing compliance, and platform integrity.
- ✓ **Legitimate Interests:** To secure accounts, diagnose technical errors, and maintain reliable mobile performance.

Data Sharing and Disclosure

EDClass **never sells, rents, or trades** personal information. Data collected through the app is only shared with:

- ✓ **Your Associated Educational Institution:** Relevant teachers, administrators, and designated safeguarding leads.
- ✓ **Vetted Service Providers:** Cloud infrastructure and notification delivery providers (e.g., Firebase for encrypted notification routing) bound by strict data protection agreements.
- ✓ **Legal Authorities:** Where required under statutory safeguarding protocols or UK law enforcement obligations.

Data Storage and Security

- ✓ **Encryption:** All communications between the mobile application and EDClass servers are encrypted in transit using industry-standard TLS protocols.
- ✓ **Hosting Location:** All primary application data is stored and processed on secure servers located within the United Kingdom.
- ✓ **Retention:** Account and platform data are retained in line with the data retention schedule agreed upon with your educational institution or as required by UK educational record-keeping regulations.

User Rights

Under UK data protection laws, users (or their legal guardians) have rights regarding their data, including:

- ✓ The right to access personal data held about them.
- ✓ The right to rectify incorrect or incomplete information.
- ✓ The right to request erasure or restriction of processing (subject to statutory safeguarding requirements).
- ✓ The right to lodge a complaint with the **Information Commissioner's Office (ICO)** (www.ico.org.uk).

To exercise these rights, learners and parents should contact their school's data protection officer directly. For direct inquiries with EDClass, see below.

Contact Information

For queries regarding this Privacy Policy or EDClass data practices:

- ✓ **Data Protection Team:** enquiries@edclass.com
- ✓ **General Support:** support@edclass.com
- ✓ **Registered Address:** EDClass Ltd, Dinnington, Sheffield, United Kingdom