



## MATHS CIRCLE LIMITED

### GDPR – FREQUENTLY ASKED QUESTIONS

	COMMON QUESTIONS	OUR RESPONSE
1.	Please confirm what sufficient guarantees you can give our school that demonstrate your understanding and implementation of your obligation, as a processor, under the new GDPR legislation, including any certifications or externally audited process's.	We are pleased to confirm that Maths Circle Ltd is compliant with the GDPR and all UK data protection legislation.
2.	Do you meet the requirements of the ICO's Age Appropriate Design Code?	<p>We are pleased to confirm that Maths Circle Ltd complies with the ICO's Age Appropriate Design Code. We have carried out full data protection impact assessments of both of our platforms, Times Tables Rock Stars and NumBots, and have implemented minor changes to ensure that we are compliant with the ICO's recommendations. By way of example:</p> <ul style="list-style-type: none"><li>• <b>Best Interests of the Child</b> - Both TTRS and NumBots have been designed to support and encourage children to achieve better maths outcomes, whilst respecting their key rights which are illustrated by the Code, including privacy rights.</li><li>• <b>Privacy settings are set to high by default</b></li><li>• <b>Our platforms do not contain geo-location services which reveal a user's location</b></li><li>• <b>We don't have any advertisements, in-app purchases or chat/messaging functions in our programmes, nor do we use any "nudge techniques" to encourage children to share data;</b></li><li>• <b>All data is limited by default on our programmes and it is clear to school staff when data is optional to provide</b></li><li>• <b>Transparency</b> - We have a child friendly privacy notice to help children understand what we do with their data. This is accessible via the "Privacy Notice" button on our play sites.</li></ul>
3.	Are you members of the ICO?	Yes, we are. Our ICO registration number is ZA250537.
4.	Do your standard contract terms include the new	Yes. Our standard terms and conditions contain a Data Sharing Agreement in the Schedule, which includes the mandatory GDPR contractual provisions relating to data sharing between data controllers and data processors.

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	GDPR mandatory provisions?	<p>This means that separate data sharing agreements or variation agreements with schools are not needed.</p> <p>Please refer to the Schedule of our Terms and Conditions titled “Data Protection with Schools” on our websites.</p>
5.	Do your standard contract terms propagate down, within a formal contract, to your sub contract providers involved in the service to our school?	Yes, we do have GDPR compliant terms in place with all our sub-contractor providers who have access to the personal data that we hold from our customers.
6.	Please detail all sub-contractors, included in the provision of your service to our school.	These are listed in Appendix B to the Schedule of our respective Terms and Conditions which can be found on our websites.
7.	Are you maintaining Data Processing Records? As outlined in Article 30 of GDPR	We are not obliged to do so under GDPR due to the size of our organisation, but we believe it is a matter of good practice to do so.
8.	Do you have a Data Protection Officer?	We are not obliged to do so under GDPR due to the size and type of our organisation, but Nicola Reddy ( <a href="mailto:nicola@mathscircle.com">nicola@mathscircle.com</a> ) is our team member who deals with all data protection matters.
9.	Can you confirm our right to have personal data deleted or upon termination of contract at no extra cost?	Confirmed. You have a “right to be forgotten” and can delete all of your personal data by navigating to “ <b>Subscription Details</b> ” – and pressing “ <b>Delete</b> ”. Alternatively, we can delete your personal data for you upon written request to <a href="mailto:support@mathscircle.com">support@mathscircle.com</a> . The deletion process may take up to 10 days for all data to delete from our backup systems.
10.	What is your data retention policy?	<p>We will delete users’ personal data where we no longer have a legitimate business need to process or hold it. We may have to retain and use personal information if required to comply with our legal and regulatory obligations, to resolve disputes, and/or to enforce our terms and conditions.</p> <p>Our policy is to automatically delete all pupil/child data from school accounts, tutor accounts and family accounts 90 days after expiry of a free trial or expiry of a subscription, where no renewal or pending subscription has been requested by that school, tutor or family. Please note that subscriptions are not automatically renewed at expiry. The main contact will be notified by us of our deletion policy prior to expiry of the subscription, and again prior to deletion of the pupil data. Deleted pupil/child data cannot be retrieved following deletion.</p>
11.	Do you have a data privacy policy and/or fair processing notice which meets GDPR requirements?	Yes, we do. Please refer to our websites for our Privacy Notices. We also have a child friendly privacy notice.

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12.	Do your contracts of employment contain confidentiality and gross misconduct clauses, in the context of customer's data privacy?	Yes, they do.
13.	Do you use cloud storage, and if so, which provider?	Yes, we occasionally use Google Drive and Dropbox for office documents.
14.	Where is data stored and is it secure?	<p>Our school data is stored securely on the following secure servers:</p> <ul style="list-style-type: none"> <li>Hetzner servers based in Germany, and (back up servers) located in Finland: <a href="https://www.hetzner.com/rechtliches/datenschutz">https://www.hetzner.com/rechtliches/datenschutz</a></li> <li>Amazon Web Services back up servers based in Ireland; and <a href="https://aws.amazon.com/">https://aws.amazon.com/</a></li> <li>Heroku servers based in Europe: <a href="https://www.heroku.com/">https://www.heroku.com/</a></li> </ul> <p>Data is encrypted in transit and at rest and our team uses secure passwords and keys to keep your data safe.</p> <p>We don't transfer your data outside of the EU. Some of our third party processors (e.g. Dropbox, Google Drive, Eventbrite, Stripe, Shopify and Intercom) store data outside of the EU, but in each case this is strictly pursuant to, and in accordance with, GDPR compliant contractual provisions including, for example, use of SCCs.</p>
15.	What data do you collect and for what purpose?	<p>Please refer to our privacy policy for full details, but in summary we collect:</p> <p>Schools:</p> <ul style="list-style-type: none"> <li>School's name, address (for billing purposes and account name)</li> <li>Teachers' names, email addresses (so we can provide you with an account and contact you)</li> <li>Pupils' names, year groups and maths classes (to administer accounts)</li> </ul> <p>Family &amp; Tutor Subscriptions:</p> <ul style="list-style-type: none"> <li>Address (for billing purposes)</li> <li>Parents'/Tutors' names and email addresses (so we can provide you with an account and contact you)</li> <li>Children's names (to administer accounts)</li> </ul> <p>Other data is optional to provide e.g. pupils' dates of birth, SEN status etc, for impact reporting purposes, but this is not needed to use and operate the product.</p>

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16.	Do you share our data with anyone?	We keep all personal information confidential and do not sell or knowingly divulge user's information to advertisers or any external third parties.  We will only disclose your personal information in very limited circumstances, which are set out in our Privacy Policy which can be found on our websites.
17.	Are user names publicly available on your platforms?	Every user on our platforms creates their own avatar which can be used to shield their public identity. Rock Names (for TTRS) and Bot Names (for NumBots) are used by default instead of Real Names on school leaderboards, competition results and in multi-player games. Children now also have the option in TTRS to change their Rock Name to "Anonymous", which means that their scores will appear as Anonymous in any leaderboard, competition results, or multi-player games to their classmates (albeit teachers will still have full access to the pupil name and stats).
18.	Do you hold financial information?	We don't hold any financial information. All credit card payments are handled by Stripe.  <a href="https://stripe.com/gb">https://stripe.com/gb</a>
19.	Can we stop getting emails from you?	All users have a right to opt-out of marketing communications at any time. Users can exercise this right by either clicking on the "unsubscribe" or "opt-out" link in any marketing e-mails we send, or by updating their details on the " <b>My Details</b> " page of our website. Alternatively, users can contact us using the contact details provided below.
20.	Do you hold any cyber security accreditation?	Yes, Maths Circle Ltd has Cyber Essentials and Cyber Essentials Plus certification.

If you have any questions or concerns about our use of your personal information, or GDPR or ICO Children's Code compliance, please contact us using the following details: [support@mathscircle.com](mailto:support@mathscircle.com).

