

# Boardworks Privacy Policy

Boardworks Ltd (“we, “us”) take data security and user privacy very seriously. This policy outlines how we use and store information on schools, Local Education Authority (LEAs) or similar organisations, their staff and students (collectively, **User(s)**) and ensure that user data remains secure.

We use data relating to Administrative Users as detailed below. For the purpose of the Data Protection Act 1998, the General Data Protection Regulation (EU) 2016/679 and any subsequent UK data protection legislation (the **Data Protection Legislation**), the data controller is Boardworks Ltd of Vantage London 1st Floor, Great West Road, Brentford, England, TW8 9AG. Our Data Protection Officer is Karl Oertel of Vantage London 1st Floor, Great West Road, Brentford, England, TW8 9AG.

We process data relating to Student Users and Parent Users as detailed below and we do this on behalf of schools, LEAs and other similar organisations. For the purpose of the Data Protection Legislation, the school, LEA or other similar organisation is the data controller and Boardworks Ltd is the data processor.

In this policy:

**“Administrative Users”** refers to someone who uses Doodle for or on behalf of a school, LEA or similar organisation including teachers.

**“Doodle”** refers to the Doodle online application ([www.doodlelearn.co.uk/app](http://www.doodlelearn.co.uk/app)).

**“Doodle Marketing Website”** refers to the marketing website ([www.doodlelearn.co.uk](http://www.doodlelearn.co.uk)), which is distinct to the Doodle online application.

**“Parent Users”** refers to parents who access Doodle.

**“Student Users”** refers to students who access Doodle.

## **INFORMATION WE COLLECT THROUGH THE DODDLE MARKETING WEBSITE**

### **Email communications**

Visitors to the Doodle Marketing Website have the opportunity to register to receive communications about Doodle by completing one of our registration forms on the Doodle Marketing Website. They may also provide their details to access sample teaching content. We use this information to send email communications regarding new products and features, promotions, and blogs about pedagogy and education. All users can unsubscribe from these communications by following the directions within the email, or by contacting us using the details listed on [www.doodlelearn.co.uk/contact](http://www.doodlelearn.co.uk/contact). We may share these details with our group companies but otherwise we do not sell or in any way pass on these details to third parties.

### **Demonstrations**

Visitors to the Doodle Marketing Website may additionally request a demonstration of the Doodle platform, either online or in person, by completing the relevant registration form on the Doodle Marketing Website. We ask these visitors to provide an email address and telephone contact number, so that we can respond to organise the demonstration. If for any reason the visitor does not wish to be contacted in this way, they are able to contact us using the details listed on [www.doodlelearn.co.uk/contact](http://www.doodlelearn.co.uk/contact). We may share these details with our group companies but otherwise we do not sell or in any way pass on these details to third parties.

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## **INFORMATION WE COLLECT ABOUT USERS THROUGH DODDLE**

### **What Student User data is stored on Doddle?**

Student User data stored in Doddle is the student's name and school year. Information is also held about the classes they are enrolled in. Schools also have the option of including an email address for their students to enable them to reset their own password. If Student Users do not have an email address linked to their account they will need to ask an Administrative User at the school to reset their password.

### **What Administrative User data is stored on Doddle?**

Administrative User data stored in Doddle is the Administrative User's name and email address. We require each Administrative User account to have an email address to allow passwords to be reset and to allow us to communicate information about changes to Doddle. We also store a teaching subject if we know it, to enable us to send curriculum-specific communications. Administrative User accounts can also have administrator privileges, which give additional rights including the ability to reset the passwords of other Administrative Users at their school.

### **What Parent User data is stored on Doddle?**

Parent User data stored on Doddle is the Parent User's name and email address. If a customer school decides to launch the Doddle Parent area, it communicates a unique key for each Student User to their parent(s) to allow them to view their child's information; when the Parent User links that Student User to their account, Doddle stores the details of this link. We require each Parent User account to have an email address to allow passwords to be reset and to allow us to communicate information about changes to Doddle.

### **Who can access the data?**

User data is only accessible to:

- Administrative Users with administrative privileges on behalf of, or under the direction of, the school, LEA or other similar organisation which the Student User/the Parent Users' child attends;
- our employees; and
- the employees of the company who develops the software platform.

Our employees who have access to User data are trained on their responsibilities in line with current Data Protection Legislation.

### **What data is communicated via the MIS link?**

We can set up an automated link between Doddle and a school's MIS using a third-party piece of software called Xporter, created by Groupcall. This link pulls the following Student User data from a school's MIS: admission number, name, year, class and subject. Administrative User data is not communicated via the MIS link and is usually extracted from the MIS by the school and sent as a file to Doddle for import.

Our employees have no direct access to any school's MIS system, and only have visibility of Student User data, limited as described above, and agreed in advance with the school.

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We are not responsible for any updates and functionality changes to Xporter; however, we regularly review Xporter functionality to ensure that it is a suitable and safe tool for importing Student User data into Doodle.

## **HOW DO WE USE THE DATA WE STORE?**

We collect information about Users so that we can:

- deliver the products and services (which includes the Doodle platform and any reports requested by authorised Admin Users);
- identify Users and manage any accounts they hold with us;
- conduct research, statistical analysis and behavioural analysis;
- let Users know about other products or services that may be of interest to them —see 'User email communication' section below;
- detect and prevent fraud;
- customise Doodle and its content to Users' particular preferences;
- notify Users of any changes to Doodle or to our services that may affect Users; and
- improve our services.

The legal basis for our processing of Users' personal data is, as applicable, where it is necessary for the performance of a contract, in order to comply with our legal obligations and/or with Users' consent.

### **User email communication**

If a Student User account has an email address associated with it, then Student Users may receive an automated email welcoming them to Doodle when they are first added to Doodle; and they will receive an email when the Student User requests a password reset on their own behalf.

This is the only time the Doodle platform would send a Student User an automated email and the only way in which we use Student Users' email addresses stored on Doodle. Our understanding is that schools are permitted to pass on Student Users' names and email addresses to us, on the basis that they are doing so to further the educational needs of the Student Users.

Administrative User accounts can also receive an automated email welcoming them to Doodle when they are first added to the site, or when an Administrative User at the school requests that a User's password, including their own, is reset. Administrative Users are also added to the recipient list for the Doodle online newsletter, which contains information about Doodle and relevant teaching resources and ideas. There is the option to opt out of these emails by clicking the unsubscribe link at the bottom of the email or by contacting [hello@doodlelearn.co.uk](mailto:hello@doodlelearn.co.uk) or [customerteam@doodlelearn.co.uk](mailto:customerteam@doodlelearn.co.uk). If an Administrative User has opted out of our newsletters, the Doodle Customer Team might still use their email address to get in touch with important information that impacts their account.

Administrative User accounts receive automated emails related to the management of their account including email address verification and password resets.

As the platform develops, we may use Parent Users email addresses to send further account information, or related products and services. There is an option to opt-out of these emails by clicking the unsubscribe link at the bottom of the email or by contacting [hello@doodlelearn.co.uk](mailto:hello@doodlelearn.co.uk) or [customerteam@doodlelearn.co.uk](mailto:customerteam@doodlelearn.co.uk). The Doodle Customer Team might still use Parent Users' email

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addresses to get in touch with important information that impacts their account. We do not sell or in any way pass on Parent Users' details to third parties.

## **WHERE IS THE DATA STORED?**

All User data on Doodle is kept on a secure database and server. All data is stored within the EU, and all Doodle servers reside within the EU.

## **KEEPING USER DATA SECURE**

We will use technical and organisational measures to safeguard each User's personal data e.g. by storing personal data on secure servers.

While we will use all reasonable efforts to safeguard Users' personal data, Users acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from User or to Users via the internet. If you have any particular concerns about your information, please contact us (see 'How to contact us?' below).

## **HOW LONG DO WE KEEP PERSONAL INFORMATION?**

We keep your personal information for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to keep personal information to comply with our legal and regulatory requirements.

## **WHAT RIGHTS DO YOU HAVE?**

Users are responsible for ensuring that information provided to us is accurate, complete and up-to-date.

Users have a number of rights in relation to their personal data, these include the right to:

- find out how we process your data;
- request that their personal data is corrected if it is incorrect or inaccurate;
- obtain restriction on our, or object to, processing of their personal data;
- if we are relying on consent, Users can withdraw their consent to our processing of their personal data (including any direct marketing);
- obtain a copy of the personal data we process concerning themselves. We may charge a small fee of up to £10.00 towards the cost of administering any request made and we will take steps to verify the User's identity before responding to their request. Once we have received the fee and verified the User's identity we will respond as soon as possible and in any event within one month; and
- lodge a complaint with the UK supervisory body, the Information Commissioner's Office (the ICO) here <https://ico.org.uk/>. If you have a concern or complaint about the way we handle your data, we ask that you contact us in the first instance to allow us to investigate and resolve the matter as appropriate.

If you would like to exercise any of your rights or find out more, please contact us (see 'How to contact us?' below).

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## **HOW TO CONTACT US?**

**Feedbackify and emails to [hello@doddlelearn.co.uk](mailto:hello@doddlelearn.co.uk), [customerteam@doddlelearn.co.uk](mailto:customerteam@doddlelearn.co.uk) and other customer services email accounts**

Doddle contains a third-party utility called Feedbackify which enables Users to contact us with problems and suggestions. When a User submits a feedbackify form, information about the User's system, including their IP address, is recorded, which helps us to diagnose technical problems. The User has the option of including an email address for us to respond to them on. Both Users and non-users can also get in touch with us via our customer services email accounts which include [hello@doddlelearn.co.uk](mailto:hello@doddlelearn.co.uk) or [customerteam@doddlelearn.co.uk](mailto:customerteam@doddlelearn.co.uk); by telephone on 01865 208 440 and through our web forms on the Doddle Marketing Website. In this instance, we collect your name and your email address for the sole purpose of responding directly on a one-time basis to a specific enquiry.

We may monitor and record communications with Users (such as telephone conversations and emails) for the purpose of quality assurance, training and compliance.

## **COOKIES**

We use cookies for certain areas of Doddle and the Doddle Marketing Website. Cookies are small text files that we place in visitors' computer browsers to store their preferences. We do this in the interest of improving the user experience of Doddle.

Please see <https://www.doddlelearn.co.uk/cookies-policy/> which details the type of cookies we use.

You can choose to disable cookies on Doddle and the Doddle Marketing Website using your browser settings. However, if you use your browser settings to disable all cookies (including essential cookies) you may not be able to access all or parts of Doddle and the Doddle Marketing Website. By continuing to use Doddle and the Doddle Marketing Website, Users agree to our use of cookies.