

ReallySchool Privacy Policy

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Revision: 1

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use the service and tells you about your privacy rights and how the law protects you.

We use your personal data to provide and improve the service. By using the service, you agree to the collection and use of information in accordance with this Privacy Policy.

Definitions

For the purposes of this Privacy Policy:

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable. Under the GDPR (General Data Protection Regulation), you can be referred to as the Data Subject or as the User, as you are the individual using the Service.

Company (referred to as either "the Company", "we", "us" or "our" in this agreement) refers to NetSupport Ltd, NetSupport House, Towngate East, Market Deeping, Cambridgeshire, PE6 8NE, England.

For the purposes of the GDPR, the Company is the Data Controller.

Application means the software program provided by the Company (namely, ReallySchool), downloaded by you on any electronic device.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Account means a unique account created for you to access our Service or parts of our Service.

Service refers to the Application.

Country refers to: United Kingdom.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used. For the purposes of the GDPR, Service Providers are considered Data Processors.

Third-party Social Media Service refers to any website or any social network website through which a user can log in or create an account to use the Service.

Personal Data is any information that relates to an identified or identifiable individual.

For the purposes of the GDPR, Personal Data means any information relating to you, such as a name, an identification number, location data, online identifier – or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

Device means any device that can access the Service such as a computer, a mobile phone or a digital tablet.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Data Controller: for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

Collecting and using your Personal Data

Types of data collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone numbers
- Photo
- Post code
- Date of birth
- Usage data
- Student gender
- Student ethnicity
- Student language
- Student observation data (may include images, audio, video and text).

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as your Device's Internet Protocol address (IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

Mobile Application permissions

While using our Application, in order to provide features of our Application, we may collect, with your prior permission:

- Pictures and other information from your Device's camera and photo library.

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We use this information to provide features of our Service, to improve and customise our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on your device.

You can enable or disable access to this information at any time, through your Device settings.

Device Data

While using ReallySchool to provide support when you are having issues, we capture device data automatically:

- Device manufacturer
- Device Model
- Device operating system version

You can see this information if you open the ReallySchool app and press on the ReallySchool version number.

Use of your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage your Account:** to manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with us through the Service.
- **To contact you:** To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide you** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about, if you opt-in and give us your consent to send such information.
- **To manage your requests:** To attend and manage your requests to us.

We may share your personal information in the following situations:

- **With Service Providers:** We may share your personal information with Service Providers to monitor and analyse the use of our Service, to contact you.
- **For business transfers:** We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With Business Partners:** We may share your information with our business partners to offer you certain products, services or promotions.

- **With other users:** when you share personal information or otherwise interact with other users, such information may be viewed by those users you have shared information with.

Retention of your Personal Data

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in the Company's secure cloud locations.

The Company's cloud is hosted on Microsoft Azure in the UK's southern region. For information on the physical security of the Microsoft Azure Datacentres, please see:

<https://docs.microsoft.com/en-GB/azure/security/azure-physical-security>

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place, including the security of your data and other personal information.

Disclosure of your Personal Data

Business transactions

If the Company is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of your Personal Data

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Detailed information on the processing of your Personal Data

Service Providers have access to your Personal Data only to perform their tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service providers to monitor and analyse the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You may opt-out of certain Google Analytics features through your mobile device settings, such as your device advertising settings, or by following the instructions provided by Google in their Privacy Policy: <https://policies.google.com/privacy>

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

Email marketing

If you opt-in and give consent for us to send you marketing information and special offers, then we may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

We may use email marketing service providers to manage and send emails to you:

Mailchimp

Mailchimp is an email marketing sending service provided by The Rocket Science Group LLC. For more information on the privacy practices of Mailchimp, please visit their Privacy policy: <https://mailchimp.com/legal/privacy/>

GDPR Privacy

Legal basis for processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given your consent for processing Personal Data for one or more specific purposes.

- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your rights under the GDPR

The Company undertakes to respect the confidentiality of your Personal Data and to guarantee you can exercise your rights.

You have the right under this Privacy Policy, and by law if you are within the EU, to:

- **Request access to your Personal Data.** The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. This also enables you to receive a copy of the Personal Data we hold about you.
- **Request correction of the Personal Data that we hold about you.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Object to processing of your Personal Data.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation which makes you want to object to our processing of your Personal Data on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request erasure of your Personal Data.** You have the right to ask us to delete or remove Personal Data when there is no good reason for us to continue processing it.
- **Request the transfer of your Personal Data.** We will provide to you, or to a third-party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Please 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 your consent.** You have the right to withdraw your consent on using your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the Service.

Exercising of your GDPR Data Protection rights

You may exercise your rights of access, rectification, cancellation and opposition by contacting us. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

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You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, if you are in the European Economic Area (EEA), please contact your local data protection authority in the EEA.

Links to other websites

Our Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact us

If you have any questions about this Privacy Policy, you can contact us:

By email: Support@reallyschool.com

By visiting this page on our website: <https://www.reallyschool.com/contact/>