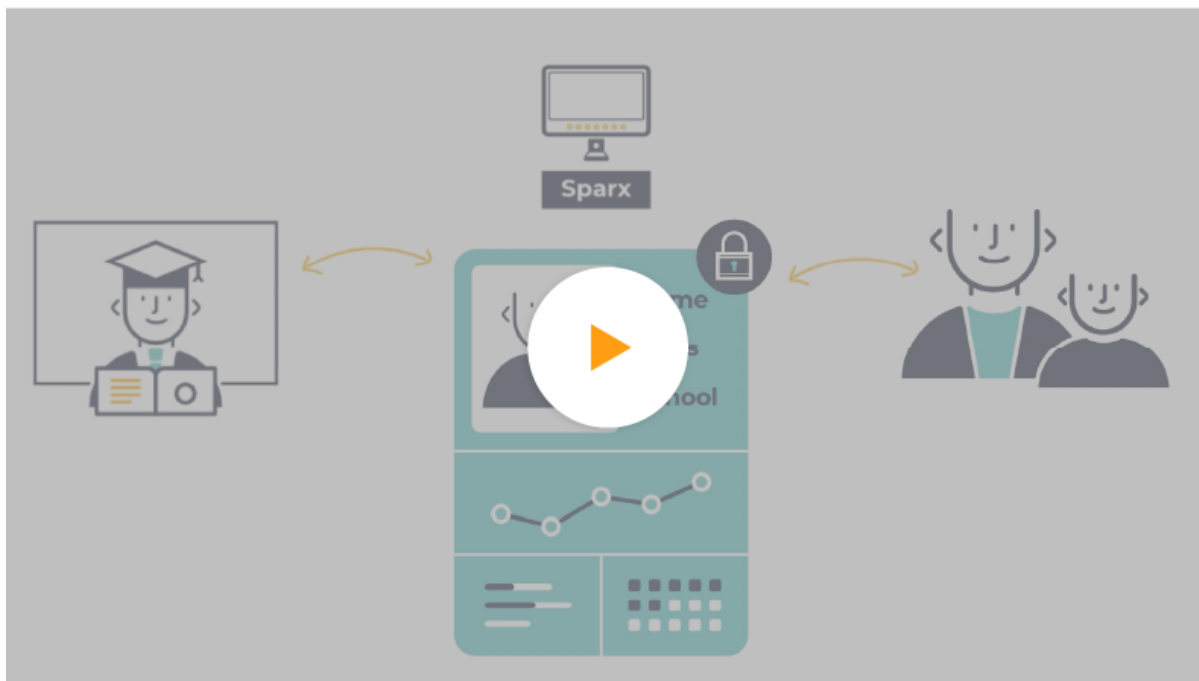


Sparx Privacy Notice for Schools (September 2023)

How the Sparx Products use personal data



Information about Sparx and this Privacy Notice

Sparx Limited (company number 07907042) (Sparx) is the entity responsible for the collection and use of personal information by Sparx Maths Homework, Sparx Reader and/or Sparx Science (together referred to as the Sparx Products and each a Sparx Product). Sparx is registered as a data controller at the Information Commissioner's Office (ICO) with registration number ZA006725.

This Privacy Notice is for:

- students;
- teachers and other school staff (teachers); and
- (where applicable) parents,

who use a Sparx Product. This notice gives you information about how Sparx collects, uses and protects personal data to deliver the Sparx Product. It is important that you read this Privacy Notice.

This version of our Privacy Notice for Schools was published in September 2023 and applies to the collection and use of personal data by Sparx from then. It aligns with the requirements of The General Data Protection Regulation (as adopted into UK law and tailored by the Data Protection Act 2018) (UK GDPR). Any changes we may make to our Privacy Notice in the future will be posted on this page, so you will always know what personal data Sparx collects, the purposes we use it for and to whom we might disclose it.

Students, teachers and parents may choose to contact Sparx via our websites or social media channels. Personal data shared in this way may be shared with schools or other third parties as necessary. We may also monitor social media to protect our intellectual property. If you would like more information about how Sparx uses personal data that you provide directly to us, including through our websites or our social media channels, please refer to our website privacy information which can be found [here](#).

Key information

- Sparx processes the personal data of students, teachers and (where applicable) parents on behalf of schools to deliver the Sparx Products. Under UK GDPR, schools using the Sparx Products are data 'controllers' and Sparx acts as a data 'processor'.
- Schools share personal data about students, teachers and (where applicable) parents with Sparx. Sparx calls this school data. This personal data is provided by the school either from the school management information system (MIS) via [Wonde](#) or from other school records. Sparx also collects personal data when the Sparx Product is being used. Sparx calls this usage data.
- We have implemented appropriate technical and organisational security measures to protect school data against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure or access. Further details are available [here](#).

Personal data relating to students (Student Data)

What Student Data is collected by the Sparx Product?

- School data: Schools securely provide Sparx with school data relating to students (Student School Data) to enable us to set-up and administer student accounts and to evaluate their progress when using the Sparx Product. This includes their name, gender, year group, class, date of birth and unique pupil number (UPN) or other identifying code (where UPN is unavailable). Schools may also provide:
 - personal data fields relating to each student, including pupil premium status, free school meals and whether they speak English as an additional language, if the school wishes to have full product functionality (for example, more detailed reporting); and
 - the school email address of each student where the school wishes to use our Single Sign-On feature.
 - Teachers may also choose to manually input Student School Data into their students' user profiles within the Sparx Product, including information on Sparx curriculum assessment marks.
- Usage data: Sparx gathers data about student activity when they use the Sparx Product (Student Usage Data) in order to optimise student learning. This includes data on student progress and performance in quizzes and questions, the use of features, when and the time spent by the student using the Sparx Product. Sparx also collects data about how and when the Sparx Product is accessed by each student and from product feedback (for example, via in-product questionnaire/survey responses).

How is Student Data used by the Sparx Product?

- Sparx processes Student School Data and Student Usage Data for the following purposes:
- delivering the Sparx Product;
- creating and administering secure student user accounts, log-ins and profiles;
- making automated task recommendations for students based on a profile we create and setting those tasks;
- using AI tools to auto-mark complex written answers (Sparx Science only);
- providing insights and reports to teachers relating to Sparx Product usage;
- providing reports and reminders by email to students' parents (currently Sparx Maths Homework only);
- identifying and reporting on when tasks are completed and whether they are completed on time;
- pseudonymising and anonymising Student School Data and Student Usage Data during each student's use of the Sparx Product and anonymising Student School Data and Student Usage Data once each student has finished using the Sparx Product;
- sharing student user accounts and log-ins between Sparx Products for trials and subscriptions of additional Sparx Products;
- providing technical and user support;
- evaluating and improving the Sparx Product (for example, analysing student user activity or testing new product features);
- measuring the effectiveness and impact of the Sparx Product; and
- for administrative purposes.

Personal data relating to teachers (Teacher Data)

What Teacher Data is collected by the Sparx Product?

- School data: In order to create and administer teacher user accounts, Sparx processes school data relating to teachers including their name, role, school email address and teaching classes (Teacher School Data). Teacher School Data is manually entered into the teacher portal within the Sparx Product by each school.
- Usage Data: Sparx gathers data about teacher activity when they use the Sparx Product (Teacher Usage Data) in order to gauge usage of Sparx platforms. This includes when and the time spent by each teacher using Sparx and actions and interventions taken by each teacher. Sparx also collects data:
 - generated from teacher interactions with emails sent by Sparx, including when emails were opened, links clicked and other related activity;
 - about how and when the Sparx Product is accessed by each teacher; and
 - from product feedback (for example, via in-product questionnaire/survey responses).

How is Teacher Data used by the Sparx Product?

Sparx processes Teacher School Data and Teacher Usage Data for the following purposes:

- delivering the Sparx Product;
- creating and administering secure teacher user accounts, log-ins and profiles;
- providing insights and reports to teachers relating to Sparx Product usage;
- pseudonymising Teacher School Data and Teacher Usage Data during each teacher's use of the Sparx Product and anonymising Teacher School Data and Teacher Usage Data once each teacher has finished using the Sparx Product;
- sharing teacher user accounts and log-ins between Sparx Products for trials or subscriptions of additional Sparx Products;
- providing technical and user support and general communications (including new products unless opted-out)
- using AI tools to classify and summarise support tickets
- for parents to reply to (where using parent/carer emails and reply feature enabled for your email address)
- evaluating and improving the Sparx Product (for example, analysing teacher user activity or testing new product features);
- measuring the effectiveness and impact of the Sparx Product or service (including recording or transcribing support meetings); and
- for financial, accounting and administrative purposes.

Personal data relating to parents (Parent Data)

What Parent Data is collected by the Sparx Product?

- School data: Where they choose to do so, schools securely provide Sparx with school data relating to students' parents (Parent School Data) in order to update parents on their child's progress. This includes their names and email addresses.
- Usage data: Sparx gathers data generated by parents from interactions with emails sent by the Sparx Product (Parent Usage Data), including when emails were opened and links were clicked.

How is Parent Data used by the Sparx Product?

Sparx processes Parent School Data and Parent Usage Data for the following purposes:

- providing reports and reminders by email to students' parents;
- providing technical and user support;
- evaluating and improving the Sparx Product (for example, analysing user activity or testing new product features);
 - measuring the effectiveness and impact of the Sparx Product; and
 - for administrative purposes.

With whom does Sparx share personal data and where is it stored?

Sparx may disclose Student Data to:

- teachers at the student's school;
- (where applicable) staff at the student's school's multi-academy trust or other school group (MAT); and
- (where applicable) parents/guardians of individual students (parents will only receive Student Data about their own child).

Sparx may disclose Teacher Data:

- other teachers at the teacher's school;
- (where applicable) staff at the teacher's school's MAT.

Sparx may disclose Parent Data to:

- teachers at the relevant student's school; and
- (where applicable) staff at the relevant student's school's MAT.

Student Data, Teacher Data and Parent Data may also be disclosed to:

- Sparx staff; and
- support companies used by Sparx to deliver the Sparx Product (a list of our support companies is available [here](#)).

We have binding written UK GDPR-compliant data processing contracts with each of our support companies, who are carefully selected, audited and approved. Support companies may be based outside of the UK however, where this is the case, data transfers to them are subject to a legally enforceable mechanism which is permitted under UK GDPR. **Our default position is we do not transfer personal data derived from school data relating to students outside the European Economic Area.** Occasionally, when a teacher, contrary to our best practice guidance, includes student data in a help ticket request this could result in personal data being processed in the USA. Where this happens, we have checked suppliers are fully GDPR compliant and audited for adequate safeguards – we will notify you should there be a change to the international transfer of school data relating to students.

Save for our support companies, Sparx will not share Student Data, Teacher Data or Parent Data with third parties without the prior written permission of the relevant school. However, we may share anonymised data sets with third parties without restriction, including for research, product development and other business purposes.

For how long is personal data stored?

Sparx does not keep personal data for longer than is necessary. School data and usage data is processed for the duration of each school's use of the Sparx Product. School data is retained after the school finishes using the Sparx Product for a maximum of two (2) years to fulfil school reporting and other requirements (including continuity of service should the school wish to re-subscribe to the Sparx Product). Once school data is no longer required for these purposes, or at the request of the school at any time after it finishes using the Sparx Product, it will be permanently deleted so the remaining usage data is anonymised. The anonymised data sets will be owned by Sparx and may be used for research, product development and other business purposes.

Cookies

In order to provide the Sparx Product via a web browser, we will place cookies on users' devices. Cookies are used to collect standard internet log and user behaviour information. This information is used to provide core functionality of the Sparx Product, ensure security, track use of the Sparx Product and to compile statistical reports. These cookies are not used to target users of the Sparx Product with online advertising. A summary of the cookies set by the Sparx Product can be found below.

Cookie Source	Sparx Product	Purpose	Necessary or Optional?
Cloudflare	Sparx Maths Homework Sparx Reader, Sparx Science	Security and accessibility	Necessary
Google	Sparx Maths Homework	Website analytics	Optional

	Sparx Reader, Sparx Science		
Hotjar	Sparx Maths Homework, Sparx Science	Collection of analytics and feedback	Optional
	Sparx Reader	Collection of analytics and feedback	Necessary
Amplitude	Sparx Maths Homework	Website analytics	Optional
Document360	Sparx Maths Homework, Sparx Reader	Sparx Product support	Optional
Hubspot	Sparx Maths Homework, Sparx Reader	Access to Sparx Product support	Necessary
Sentry	Sparx Maths Homework Sparx Reader, Sparx Science	Bug reporting service	Necessary
Status.io	Sparx Maths Homework	Service disruption notification	Necessary

'Necessary' cookies enable core platform functionality and features such as security, network management and accessibility and do not require user consent to be set. Cookies that enable functionality that is not strictly necessary for core platform functions and features are classed as 'Optional' and therefore consent is sought via a cookie banner. For further information about cookies generally, visit www.aboutcookies.org.

Your personal data rights

Your rights in relation to your personal data are:

1. The right to be informed of processing.
2. The right to access personal data by making a subject access request.
3. The right to rectification where personal data is inaccurate or incomplete.
4. The right to erasure, sometimes called 'the right to be forgotten'.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object to processing.
8. The right not to be subject to a decision based solely on automatic processing.

These rights do not apply in all instances. Please contact your school if you have any requests or questions relating to your rights. Sparx will assist schools with upholding data subject rights in circumstances where it is legally required or it is possible to do so.

You also have the right to make a complaint at any time to the ICO regarding the collection and use of personal data by Sparx. However, we would appreciate being given the chance to help you with your concerns before you approach the ICO, so please contact us using the details below in the first instance. For more information about the ICO, please visit <https://ico.org.uk/for-the-public/>.

How to contact us

Questions, comments and requests regarding personal data that we hold, or regarding this Privacy Notice, are welcomed and should be addressed to privacy@sparx.co.uk. Alternatively, please contact The Privacy Team, Sparx Limited, Oxygen House, Grenadier Road, Exeter, Devon EX1 3LH. We have appointed IT Governance Europe Limited to act as our EU representative for schools located in the EU. Should you have any privacy queries, you can contact us directly or via our EU representative by emailing eurep@itgovernance.eu.

