## **Collins Privacy Notice for Schools**

#### Who are we?

Collins is part of HarperCollins Publishers. We publish books and online resources for UK and international schools. We have various learning platforms that can be used with our books, online content and our website, hereinafter referred to as the Online Services.

### What you need to know?

School students who are under the age of 13 years old will need the consent of their parent or guardian in order to use the Online Services.

Students, teachers and other staff members from your school that use the Online Services (hereinafter collectively referred to as the **Individuals**) will have some of their personal information held by us; this shall now be referred to as the **Personal Information**. The Personal Information we collect includes the following: the Individuals' names, usernames and any other information that is personal to them, such as their email addresses.

If the Individuals, the parent/guardian of a student, and/or the school are not happy for the Personal Information to be collected and/or retained by us, they can tell us to stop by emailing GDPR@harpercollins.co.uk or writing to HarperCollins Publishers, The News Building, 1 London Bridge Street, London, SE1 9GF.

### What do we do?

Our role is to produce books for learning, and Online Services for schools. We only collect Personal Information when we need it to help us provide Individuals and schools with Online Services; and to follow the laws surrounding data protection. When a student uses the Online Services, their work is stored by us to track their learning journey. In some of these Online Services, the Individuals can also see this and we can share these reports with the school and/or the students' parents or guardians.

## **Personal Information**

When a school uses the Online Services, the email addresses or usernames of the Individuals are linked to identifying numbers which match to the website page they are using. The identifying numbers are specific to each Individual.

The identifying numbers are used to do the following things:

- 1. Track the progress the students have made when using the Online Services so that, if the Individuals log off, when they log back in, they will not lose their place on the platform;
- 2. Track when the Individuals logged in and how long they spent using the Online Services;
- 3. If a student does a test when using the Online Services, the identifying number tracks their test information. We collect the students' progress and the teachers will have access so they can see how each student is progressing; and
- 4. If the Individuals are using our secondary level educational Online Services, we also keep their names in our systems.

### How do we use the Personal Information?

We collect Personal Information for these reasons:

- 1. so that the Individuals can use the Online Services;
- 2. so that the Individuals can see how well students are doing by comparing tests; and
- 3. so that we can monitor and assess how well the Online Services are working.

We may also collect other miscellaneous information in the Online Services, but ensure that all of the Individuals' information is encrypted so that they are not identifiable in the information.

## The Individuals' Rights

The Individuals are allowed to:

- 1. be told how we use their information;
- 2. ask to see the information they have about them;
- 3. ask us to change the information they think is wrong;
- 4. ask us to remove information when it's not needed anymore;
- 5. ask us to only use their information in certain ways;
- 6. ask us to move their information to someone else; and
- 7. tell us that they don't want their information to be used anymore.

If an Individual wants to speak to someone other than us, or complain about how we use their Personal Information, they can contact the Information Commissioner's Office (ICO). Their contact details are available on their website: https://ico.org.uk/.

# Who do we share the Personal Information with?

There are other people and business entities who help us with our business and provide the Online Services to the Individuals. Such people and entities help us in the following ways:

- 1. they help us to run the Online Services;
- 2. they help us understand how the Online Services are being used; and
- 3. they help us improve the Online Services.

Sometimes, we will use information we collect in reports that analyse usage of the Online Services. This information will never include Personal Information.

We may also share the Personal Information with law enforcement agencies if they ask us to do so.

## The law

We collect the Personal Information because we need it to make the Online Services work. As a result, using the Personal Information is "necessary for the purposes of our legitimate interests". This means that we are using the information for standard reasons in business, i.e. so that we can make the Online Services work, and for no other reason. It also means that we are not using the Personal Information unfairly and it doesn't change the Individuals' legal rights.

## Do we have to be given Personal Information?

We need to retain email addresses, login IDs and/or usernames so that the Individuals can use the Online Services.

## How long will we keep the Personal Information?

We don't keep the Personal Information forever; we only keep it for as long as we need to in order for the Online Services to be used successfully. The Individuals can request more information about this at any time. We do not use the Individuals' email addresses for marketing purposes.

## **Transfer of Personal Information**

Sometimes the Personal Information we hold will be sent out around the world. This will only happen if another company in another country helps us to run the Online Services. We do what we are permitted to by law to ensure that those companies will also keep the Personal Information as safe as possible.

## **Full Privacy Policy Terms & Conditions**

Our full Privacy Policy Terms & Conditions can be found here: HarperCollins Publishers - Corporate Privacy Policy