

PRIVACY POLICY

B Squared Ltd. is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. This Privacy Policy applies to personal data relating to the Software Products accessed through My B Squared website, a central management system for configuring any of B Squared Ltd.'s Software Products and governs data collection and usage where B Squared Ltd. acts as a controller of that data (as required by section 93 of the Data Protection Act 2018). By using the Software Products, you consent to the data practices described in this statement.

Where B Squared Ltd. performs the role of data processor in relation to pupil data uploaded by you (acting as data controller or duly authorised agent for the data controller) utilising any Software Product, the basis on which B Squared Ltd. deals with this third party data is governed by the relevant provisions contained in the terms and conditions forming part of the binding contract that B Squared Ltd. enters into with data controller clients and which include provisions constituting both the controller-processor agreement required by section 59 of the Data Protection Act 2018) and a confirmation of the categories of data processing carried on by B Squared Ltd. and other information required of a processor by section 61(4) of the Data Protection Act 2018. See section 4 (Data Protection) and Schedules 1 (Hosting Services) and 4 (Processing, Personal Data and Data Subjects) of the terms of conditions currently offered by B Squared Ltd. to such clients.

B Squared Ltd. only processes such data on instructions from the data controller (in this case an educational institution) or (if applicable) to comply with a legal obligation, in accordance with section 60 of the Data Protection Act 2018. For the information required (including pursuant to sections 44 and 45 of the Data Protection Act 2018) to be provided by educational institutions in their capacity as data controllers to data subjects (in this case pupils) in relation to the personal data that we process as data processors, a pupil (or a person having parental responsibility for the pupil) should in the first instance contact the educational institution that the individual concerned believes is processing that personal data as data controller and, where available for public inspection, read the relevant privacy notice issued by that institution and proceed from there.

Any complaint that a pupil may have in relation to an educational institution's processing of that individual's personal data, which is not answered satisfactorily by the educational institution, can ultimately be referred by or on behalf of the pupil to the Information Commissioner's Office (ICO) (contact details below). To the extent that B Squared Ltd. may become involved, it will act in compliance with its legal obligations as data processor to the educational institution concerned and, where the ICO becomes involved, B Squared Ltd.'s obligations to the ICO.

SCOPE OF PRIVACY POLICY

This Privacy Policy applies only to your use of the My B Squared and accordingly B Squared Ltd. advises you to review the privacy statements of websites to which the My B Squared website that may be linked and to which you choose to link before providing any data to them so that you can understand how those websites collect, store, use and share your information. B Squared Ltd. is not responsible for the privacy statements or other content on other websites except other websites operated by B Squared Ltd.

DEFINITIONS AND INTERPRETATION

Account any account which enables a person to access the Software Products and to utilise any of the services (including the hosting and/or maintenance and support services) provided by B Squared Ltd.

B Squared Ltd.	a limited liability company registered in England and Wales under company registration number 04088829 whose registered office is situated at 3 Meadows Business Park, Blackwater, Camberley, Hampshire, GU17 9AB.
Connecting Steps	assessment software written by B Squared Ltd. for tracking the progress of students.
Data Protection Law	(i) the General Data Protection Regulation (Regulation (EU) 2016/679), the Law Enforcement Directive (Directive (EU) 2016/680) and the Privacy and Electronic Communications Regulation 2003 (SI 2003/2426) (as amended) as the same are to be applied pursuant to the European Union (Withdrawal) Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019/419 and any other applicable national implementing laws (ii) the Data Protection Act 2018 to the extent that it relates to processing of personal data and privacy; and (iii) all other applicable law about the processing of personal data and privacy.
Evisense	evidencing platform by B Squared Ltd. for storing media files against a student's profile.
My B Squared	a central management system for configuring any of B Squared Ltd. Software Products.
personal information	any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to B Squared Ltd. via the My B Squared website. This definition shall be construed so as to conform with all applicable Data Protection Law.
Software Products	together and separately Connecting Steps and Evisense.
You	the school which has entered into a contract with B Squared Ltd. to purchase the services provided via the My B Squared website and each Authorised User (as defined in that contract) for whom the school is responsible and who is entitled to access a Software Product and you shall be construed accordingly.

YOUR DATA PROTECTION RIGHTS

You have the following rights under the Data Protection Law, which this Privacy Policy and B Squared Ltd.'s use of personal information has been designed to uphold:

Your right of access - You have the right to ask B Squared Ltd. for copies of your personal information (see further below) (a subject access request).

Your right to rectification - You have the right to ask B Squared Ltd. to rectify personal information you think is inaccurate. You also have the right to ask B Squared Ltd. to complete information you think is incomplete.

Your right to erasure - You have the right to ask B Squared Ltd. to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask B Squared Ltd. to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that B Squared Ltd. transfers the personal information you gave it to another organisation, or to you, in certain circumstances.

As a general rule, you are not required to pay any charge for exercising your rights. However Data Protection Law permits B Squared Ltd. to charge a reasonable fee to cover B Squared Ltd.'s administrative costs in replying to a subject access request where it is of the opinion that the request is manifestly unfounded or excessive or where you request additional copies of information.

If you make a subject access request, B Squared Ltd. generally has one month to respond to you. Where B Squared Ltd. has requested a fee (see above) then the one month period starts from when it receives the fee.

When making a subject access request to B Squared Ltd. would ask that your request includes the following:

- a clear label for your request (e.g. use 'subject access request' as your email subject line or a heading for your letter);
- the date of your request;
- your name;
- any other information used by the organisation to identify or distinguish you from other individuals (e.g. customer account number or employee number);
- your up-to-date contact details;
- a comprehensive list of what personal data you want to access, based on what you need;
- any details, relevant dates, or search criteria that will help the organisation identify what you want;
- how you would like to receive the information (e.g. by email or hard copy)

If you wish to make a request, please contact B Squared Ltd. at:

Email: dpo@bsquared.co.uk

Post or hand delivery: 3 Meadows Business Park, Blackwater, Camberley, Hampshire, GU17 9AB

HOW TO COMPLAIN

If you have any concerns about B Squared Ltd.'s use of your personal information, you can make a complaint to B Squared Ltd. Either by email (dpo@bsquared.co.uk) or written correspondence (3 Meadows Business Park, Blackwater, Camberley, Hampshire, GU17 9AB)

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how B Squared Ltd. has used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

COLLECTION OF YOUR PERSONAL INFORMATION

B Squared Ltd. collects personally identifiable information, such as your email address or name.

B Squared Ltd. also collects anonymous demographic information, which is not unique to you, such as your, age, gender, preferences, interests and favourites.

There is also information about your computer hardware and software that is automatically collected by B Squared Ltd. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used by B Squared Ltd. for the operation of the service, to maintain quality of the service, safeguarding and to provide general statistics regarding use of the Software Products.

B Squared Ltd. does not read any of your private online communications.

BASIS FOR PROCESSING PERSONAL INFORMATION

For the purposes of the Data Protection Law, the lawful bases B Squared Ltd. relies on for processing personal information will (as appropriate to the particular circumstances) be that:

- (a) it is necessary in order to enable B Squared Ltd. to fulfil its contractual obligations; or
- (b) B Squared Ltd. has a legal obligation to process the information;

If neither of the above apply

(c) B Squared Ltd. otherwise has a legitimate interest in processing the information (whether that be to further its own commercial interests or otherwise: in each case where B Squared Ltd. relies on this basis it has done so only so far as is necessary and before relying upon this basis B Squared Ltd. evaluates the relative risk of harm to the data subject against the benefit of processing data in reliance on this ground); or

(d) only if none of the above apply, you have consented to the processing of your information by B Squared Ltd.

USE OF YOUR PERSONAL INFORMATION

B Squared Ltd. does not routinely use, nor does it disclose to any third party, any of the special categories of personal data (as defined in the Data Protection Law), such as race, religion, political affiliations, health etc. and will not do so without your explicit consent. This policy will extend to any other categories of such personal information that may from time to time be added in the future by the Data Protection Law.

B Squared Ltd. collects and uses your personal information to operate the My B Squared website, manage your Account, and deliver the services you have requested. B Squared Ltd. also uses your personally identifiable information to inform you of other products or services available from B Squared Ltd. B Squared Ltd. may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

B Squared Ltd. does not sell, rent or lease its customer lists to third parties. B Squared Ltd. may share data with trusted partners to help B Squared Ltd. perform statistical analysis, send you email or postal mail or provide customer support (and see further below the section titled 'Use of Cookies'). All such third parties are prohibited from using your personal information except to provide these services to B Squared Ltd., and they are required to maintain the confidentiality of your information. B Squared Ltd. keeps track of the websites and pages its customers visit within and from the My B Squared website, in order to determine what B Squared services are the most popular. This data is used to deliver customized content and new features within the My B Squared website to customers whose behaviour indicates that they are interested in a particular content or features.

B Squared Ltd. will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the requirements of Data Protection Law or comply with legal process served on B Squared Ltd.; (b) protect and defend the rights or property of B Squared Ltd.; and (c) where B Squared Ltd. believes in good faith that it is necessary to protect the personal safety of any individual, including members of the public.

USE OF COOKIES

The My B Squared website uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the My B Squared server that you have returned to a specific page. For example, if you personalize My B Squared website pages, or register with the My B Squared website or services, a cookie helps to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the My B Squared website, the information you previously provided can be retrieved, so you can easily use the features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Software Products or the website pages you visit.

SECURITY OF YOUR PERSONAL INFORMATION

B Squared Ltd. secures your personal information from unauthorized access, use or disclosure. B Squared Ltd. secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

B Squared Ltd. only keeps your personal information (your contact details as recorded by its transactional email system) for as long as it needs to in order to use it for the purposes specified above (and in any event where B Squared Ltd. is relying exclusively on your consent to hold the personal information data, until you such time as you withdraw that consent).

Your data will only be stored in the UK.

CHANGES TO THIS PRIVACY POLICY

B Squared Ltd. may change this Privacy Policy from time to time (for example, if Data Protection Law

changes or to reflect company and customer feedback). Any changes will be immediately posted on the My B Squared website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the My B Squared website following the alterations. B Squared Ltd. recommends that you check this page regularly to keep up-to-date as to how B Squared Ltd. is protecting your information.

Issue Date: 16 February 2022

Revised: 8 March 2022