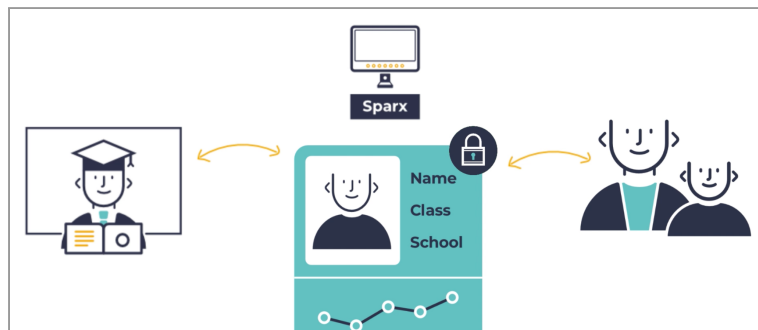


PRIVACY NOTICE FOR SCHOOLS USING SPARX



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Information about Sparx

Sparx Limited (company number 07907042) (**Sparx**) is the entity responsible for the collection and use of personal information by Sparx. Sparx is registered as a data controller at the Information Commissioner's Office (**ICO**) with registration number ZA006725.

Information about this Privacy Notice

This Privacy Notice is for

- students;
- parents;
- teachers; and
- other school (and if applicable, Multi Academy Trust (**MAT**)) staff,

who use Sparx Maths (a maths lessons and homework platform), MathsFit (times tables practice platform) or Sparx Reader (reading support platform) or who are participating in research programmes conducted by Sparx. This notice gives you information about how Sparx collects, uses and protects personal information to deliver our educational technology platforms. **It is important that you read this Privacy Notice.**

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 information Sparx collects, the purposes we use it for and to whom we might disclose it.

Schools using Sparx are required to provide information to students, parents, teachers and other school (and, if applicable, MAT) staff about Sparx's data processing. As well as this Privacy Notice, please make sure you refer to this information, which will be made available by your school.

This version of our Privacy Notice for Schools was published in July 2021 and applies to the collection and use of personal information by Sparx from July 2021. It aligns with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation as enacted in the United Kingdom.

If you would like more information about how Sparx uses personal information 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](#).

Why does Sparx use personal information?

Sparx assists teachers in delivering comprehensive and personalised teaching to their students. To do this, Sparx processes the personal information of students, their parents and teachers on behalf of schools. Schools using Sparx act as data controllers and Sparx acts as the data processor by providing a service to schools which requires personal information to be processed in order to produce individually tailored questions and other learning support. Sparx also researches the impact it has on students' learning outcomes, so Sparx collects data on students' performance through research projects.

How does Sparx get personal information?

Schools share personal information about their students, parents, teachers and other school staff with Sparx. Sparx calls this **School Data**. This personal information is provided by the school either from the school management information system (**MIS**) or from other school records. Sparx also collects personal information and user data when Sparx is being used. Sparx calls this **Usage Data**. Sparx runs educational research projects with, and collects feedback from, participating schools. The data generated by these projects is called **Research Data**.

What personal information does Sparx use for MathsFit (in primary schools), Sparx Reader (in primary and secondary schools) and Sparx Maths (in secondary schools)?

Sparx processes the personal information of students, parents and teachers on behalf of schools. In usual circumstances, schools using Sparx platforms act as data controller and Sparx is the data processor, providing a data processing service to the school. In limited circumstances, Sparx acts as joint data controller with a school. Where this applies, Sparx and the school put in place an agreement to allocate data controller responsibilities between them.

Personal information relating to students (Student Data)

What Student Data is collected by Sparx?

- **School Data:** The school securely provides Sparx with Student Data to enable Sparx to set-up and administer student accounts, and to evaluate the progress of the student. This includes information such as name, gender, date of birth, class, unique pupil number or other identifying code) and (where and as applicable), KS2 and GCSE results, question level analyses after half-termly school assessments, if they are in receipt of pupil premium, their free school meal status and if English is an additional language. Where available, should the school connect to Sparx using Single Sign On, student email addresses will be shared with Sparx. Teachers also input Student Data into their students' user profiles within Sparx, including information on attendance, interventions and work completion. The range of personal information shared with Sparx is outlined in the subscription terms agreed by the school for the relevant Sparx platform.
- **Usage Data:** Sparx gathers data about student activity when they use Sparx 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 Sparx. Sparx also uses data analytics and collects information about how and when Sparx platforms are accessed.

How is Student Data used?

Sparx combines Student School and Usage Data in order to:

- Set up and administer student accounts;
- Convert trial accounts to full accounts;
- Provide technical support, deal with help requests and enquiries;
- Build a profile of each student's performance and progress;
- Provide education platforms, including tailored questions and support;
- Populate algorithms which recommend individualised work for teachers to set;
- Provide an overview for teachers to allow them to monitor student progress and record their actions;
- Make predictions about future attainment;
- Update parents on work progress and completion;
- Connect Student Data and Parent Data;
- Provide reports to teaching and MAT staff on student attainment and progress;
- Conduct research into usage and impact of Sparx platforms, and students' educational performance and outcomes;
- Evaluate, improve and develop Sparx platforms; and
- Be de-identified through aggregation and anonymisation.

Personal information relating to parents (Parent Data)

What Parent Data is collected by Sparx?

- School Data: In the case of Sparx Maths, Sparx collects parent names and email addresses from the school in order to update parents on their child's progress.
- Usage Data: To gauge parent usage of Sparx platforms, Sparx collects data generated by parents from interactions with emails sent by Sparx, including when emails were opened, links clicked and other related activity. Sparx also uses data analytics and collects information about how and when Sparx platforms are accessed.

How is Parent Data used?

Sparx combines Parent School and Usage Data in order to:

- Contact parents via email about their child's maths progress and identify areas requiring support;
- Connect Student Data and Parent Data;
- Conduct research into usage and impact of Sparx platforms, and students' educational performance and outcomes;
- Provide technical support, deal with help requests and enquiries;
- Evaluate, improve and develop Sparx platforms; and
- Be de-identified through aggregation and anonymisation.

Personal information relating to teachers (Teacher Data)

What Teacher Data is collected by Sparx?

- School Data: In order to set up and administer user accounts, Sparx processes information relating to teachers including name, title, job role, email address and teaching classes.
- Usage Data: To gauge usage of Sparx platforms, Sparx collects data generated by teachers' activity when using Sparx, including when and the time spent using Sparx and actions and interventions taken by the teacher. Sparx collects data generated by teachers from interactions with emails sent by Sparx, including when emails were opened, links clicked and other Sparx activity. Sparx also uses data analytics and collects information about how and when Sparx platforms are accessed.

How is Teacher Data used?

Sparx combines Teacher School and Usage Data in order to:

- Set up and administer teacher accounts;
- Provide teachers with access to Student Data;
- Provide teachers with email updates;
- Quantify usage of Sparx platforms,
- Provide technical support, training, deal with help requests and enquiries;
- Provide information about system changes, availability or updates;
- Conduct research into usage and impact of Sparx platforms, and students' educational performance and outcomes;
- Evaluate, improve and develop Sparx platforms; and
- Be de-identified through aggregation and anonymisation.

What other personal information does Sparx collect?

Sparx researches the effectiveness of its platforms in a range of ways:

- Research Data relating to students: To improve Sparx platforms, Sparx conducts product research and evaluates its performance in selected schools by analysing usage data, observing classes and running feedback sessions and surveys with students. Research Data is only collected in this way where schools have agreed to participate.
- Research Data relating to parents: To improve Sparx platforms, Sparx seeks feedback from parents in selected schools and collects data relating to the use, and parental evaluation, of Sparx. Research Data is only collected in this way where schools have agreed to participate.
- Research Data relating to teachers: To improve Sparx platforms, Sparx seeks feedback when support requests are made and through its Teacher Panel forum (where teachers share feedback and opinions relating to Sparx). This information is collected via in-product features, email questionnaires and/or face to face interviews.

Sparx stores the contact details, emails and other communications from school and MAT staff in order to onboard and provide ongoing support to school staff. Where staff have not chosen to opt out, Sparx will also use contact details to:

- Provide newsletters and email updates;
- Offer new services and products; and
- Coordinate training and events as part of the Sparx Community.

Students, parents and teachers may choose to contact Sparx via the Sparx website or through Sparx's social media channels. Personal information shared in this way may be shared with schools, MATs and other third parties as necessary. For more information please refer to Sparx's privacy policy for our website and other communication channels ([here](#)).

Where is your personal information stored?

The majority of the personal information we collect will be stored and used in the UK at our offices and in our secure data centres. We will only transfer your data outside of the European Economic Area (**EEA**) where it is necessary for us to do so because there are no reasonable and commercially appropriate alternatives based in the EEA. **No Student Data is transferred outside the EEA - we will notify schools should there be a change to the international transfer of Student Data.** Where any of our third party service providers (**support companies**) store data we send to them for processing on our behalf outside of the EEA, we ensure protection is afforded to it by implementing at least one of the following safeguards:

- We will only transfer your personal information to a support company located in a country outside the EEA that has been deemed to provide an adequate level of protection for personal information by the European Commission.
- We will use a specific contract approved by the European Commission which contains provisions giving personal information the same protection it has in Europe.
- We will undertake a detailed adequacy assessment of the support company to validate that it has good privacy safeguards and security features in place to prevent unauthorised access of data we send it.

Following Brexit, the EU-UK Trade & Co-operation Agreement allows personal data to continue to flow from the EU to the UK. Sparx will continue to follow guidance issued by the ICO so that personal data flows between Europe and the UK are not disrupted.

A list of the support companies with whom we share personal information can be found [\[here\]](#). This list will be updated regularly.

How does Sparx share your personal information?

Sparx discloses Student Data to:

- Teachers at the student's school;
- Other staff at the student's school and / or MAT (or other managing organisation i.e. alliances); and
- Parents / guardians of individual student's (parents will only receive Student Data about their own child).

Sparx discloses Parent Data to:

- Teachers at the student's school; and
- Other staff at the student's school and / or managing organisation.

Sparx discloses Teacher Data to:

- Other teachers at the teacher's school; and
- Other staff at the teacher's school and / or MAT (or other managing organisation i.e. alliances).

The personal information of students, parents and teachers will also be disclosed to:

- Sparx staff;
- Support companies used by Sparx (details can be found [here](#));
- Research partners; and
- Third parties, if required by law.

Sparx may also disclose personal information in the event that a third party acquires Sparx or its assets, or Sparx enters into any joint venture arrangements. **Personal information will never be sold, or used to market or sell non-Sparx products or services.** Sparx may share non-personal information with third parties provided that data is in an aggregated or wholly anonymised form, and that the third party agrees not to attempt to identify individuals from that data.

How long is personal information stored for and what happens to it?

Sparx does not keep personal information for longer than is necessary. Personal information is retained by Sparx whilst the user (student, parent or teacher) is active. When a user stops using Sparx, their personal information will be retained temporarily to fulfil reporting and other requirements. When the personal information is no longer required for these purposes, it will either be deleted or stripped of the most identifying data, so as to block re-identification (a process called anonymisation). As such, because re-identification is not possible, the data is no longer personal information and may be retained indefinitely by Sparx.

How non-personal information is used

Sparx uses anonymised, non-personal information for researching the results achieved through the use of Sparx platforms. Non-personal information may be shared with third parties for the purposes of research. With permission, data aggregated at school level may be shared between other schools, MATs and alliances. Non-personal information is also used for marketing Sparx to prospective users.

Security of personal information at Sparx

Sparx is committed to protecting and respecting privacy. Sparx has appointed a Data Protection Officer who advises on, and oversees matters relating to privacy and data security. Appropriate security measures have been put in place to prevent personal information from being lost, used or accessed in an unauthorised way. Sparx conducts regular penetration testing and limits access to personal information to only those employees, service providers and other third parties who have a legitimate need for access.

Cookies

In order to provide Sparx services via a web browser, Sparx 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 Sparx websites and platforms, ensure security, track use of Sparx services and to compile statistical reports. These cookies are **not** used to target users of Sparx platforms with online advertising.

A summary of the cookies set by Sparx can be found below:

Cookie Source	Platform	Purpose	Necessary or Optional?
Cloudflare	Sparx Maths MathsFit Sparx Reader	Security and accessibility	Necessary
Hubspot	Sparx Maths* MathsFit* *teacher versions of the site only	Access to product support	Necessary
Status.io	Sparx Maths MathsFit	Service disruption notification	Necessary
Google	Sparx Maths MathsFit Sparx Reader	Website analytics	Optional

Hotjar	Sparx Maths MathsFit	Collection of analytics and feedback	Optional
	Sparx Reader	Collection of analytics and feedback	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 rights

Your rights in relation to your personal information are:

1. The right to be informed of processing.
2. The right to access personal information by making a subject access request.
3. The right to rectification where personal information 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 information 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 information that we hold, or regarding this Privacy Notice, are welcomed and should be addressed to privacy@sparx.co.uk. Alternatively, please contact The Data Protection Officer, Sparx Limited, Oxygen House, Grenadier Road, Exeter, Devon EX1 3LH.

For users of Sparx Maths who are based in the EU, we have appointed IT Governance Europe Limited to act as our EU representative. If you have any queries in relation to your rights or general privacy matters, our preference would be for you to contact us directly, however you can alternatively email our EU representative at eurep@itgovernance.eu. Please ensure to include our company name (Sparx Limited) in any correspondence you send to our EU representative.