Dear Headteacher or Principal,

This documentation gives comprehensive and complete answers to every section of the GDPR legislation needed to satisfy your data protection and safeguarding duties as a school. Post-Brexit, the GDPR has been incorporated into the Data Protection Act 2018, so all sections of this document that refer to the GDPR also refer to UK law in accordance with the DPA.

We have ensured that when we need to seek consent from you, we have easy-to-use pathways to allow you to give it freely, in a specific, informed and unambiguous manner. As an individual within the school or if you are acting on behalf of the whole school, you also have the opportunity to withdraw your consent at any time, as easily as it was given, in alignment with the GDPR.

From the start, our service has been designed with security as a priority. This includes security policies enforced across the whole service and following the best secure coding practices.

By default, we keep personal information only for the amount of time necessary to provide the SAM Learning product and service. I assure you that the information and audits in this booklet demonstrate that only the minimum data required to complete our service and business functions are used.

Likewise, so that you have been sufficiently informed to ensure fair and transparent data processing, and so that you can answer any questions during your own audits, we have made this booklet so that the information the GDPR requires is provided to you in a concise, transparent, intelligible and easily accessible form.

My team has worked incredibly hard, alongside internal specialists such as Hill Dickinson LLP, to produce this Legal Compliance Documentation and audit all that we do. We are doing this because our family of schools is very important to us and we have taken the opportunity afforded by the advent of the GDPR to really review what we do and put our client schools at the heart.

You will be notified immediately of any urgent updates, changes, amendments or addenda. For all other updates, these will be aggregated over a period of six months and communicated to you at the end of this period. Our updated Privacy Policy and Learner Data Policy Statement are available on our website at *https://www.samlearning.com/privacy-policy-gdpr/*. For any queries related to this documentation, please use the details on the back page to contact SAM Learning's DPO.

Yours faithfully,

David Jaffa
Founder & Managing Director
SAM Learning

Table of Contents

UK GDPR / DPA 2018 Requirements

As the purpose of this document is to clarify compliance with GDPR / DPA 2018 Regulations, this section gives an overview of how we meet the requirements of GDPR Article 28 (3).[1] Please continue to read the full document for specific details.

SAM Learning Limited ('we', 'our') is the **Data Processor**.
The **School** or **Association** is the **Data Controller**.

1. **Processing only on the documented instructions of the controller**
   - This document sets out the data that we process and how we process it
   - The signed contract from the School or Association is the instruction to process data in these ways
   - This document is reviewed biannually as part of SAM Learning's internal GDPR audit process and any changes are communicated with the schools

2. **Duty of confidence**
   - Only our contracted staff work with data from our schools
   - Our Duty of Confidence is made explicit in our Staff Handbook, signed by all staff members
   - Regular Data Protection training of staff is held with a certification course undertaken every year

3. **Appropriate security measures**
   This document details all the security measures taken to ensure that SAM Learning meets the requirements of Article 32 on the security of processing. These include:
   - The use of encryption technology and firewalls to protect the server from unauthorised access
   - The anonymisation of all teacher and learner data within 90 days of the end of a subscription
   - All systems access restricted to authorised personnel and/or IPs; keys and passwords kept in an unreadable, closed format
   - A DBS check for all SAM Learning staff, renewed every 3 years
   - Back-up technology that would allow the retrieval of personal data in the event of an incident
   - Internal biannual audits, processes, documentation and staff training to test and assess the effectiveness of the measures in place

4. **Using sub-processors**
   - This document identifies all sub-processors that we use. This list is updated biannually.
   - Data Protection Policies / Contractual Terms are checked when a new sub-processor is used
   - Any sub-processors outside the EU are required to sign a contract that imposes the same Article 28(3) data protection obligations on that sub-processor
   - A sample of the Data Protection Policies of sub-processors are reviewed as part of our biannual GDPR audit process

5. **Data subjects' rights**
   - This document states how we will take 'appropriate technical and organisational measures' to help the controller respond to requests from individuals to exercise their rights
   - This includes appropriate communications with a School should an individual (teacher or learner) request access to their information
   - At any time, you have the right to request information on what data we hold about you or your school. To make a Subject Access Request, please contact the DPO by emailing DPO@samlearning.com
   - SAM Learning has internal procedural documents on managing subject access requests which form a part of staff training

6. **Assisting the controller**
   - We work actively with schools to maintain the security of data. This includes the use of Groupcall as a sub-processor, working to transfer teacher and learner data to us
   - Additionally, we request that any data sent to us by schools be passworded
   - We provide training to schools regarding their administrative use of data within the SAM Learning Platform

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[1] This page has been written with reference to the ICO's Guidance.

7. **End-of-contract provisions**
    - As this document details, all teacher and learner data on the SAM Learning Platform is anonymised within 90 days of the end of a subscription
    - From that point, we will only hold a small amount of contact information for senior staff in our CRM. Only contact information already in the Public Domain is held

8. **Audits and inspections**
    - As detailed below, we carry out biannual GDPR Audits, which are published on our website
    - Following each audit, an Assurance of Compliance statement is shared with all of our schools

Privacy Information Provided to Schools

We provide schools with the following privacy information:

- ❖ The name and contact details of our organisation:
    - o Registered Office: SAM Learning Limited, SAM Learning Limited, 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, United Kingdom, WA14 2DT.
    - o Registered in England. No. 2826785

- ❖ The name and contact details of our Data Controller:
    - o David Jaffa, Managing Director
    - o **Email: djaffa@samlearning.com   Tel: 0845 130 4160**

- ❖ The name and contact details of our Data Protection Officer (DPO):
    - o Data Protection Officer: Neil McKie, Academies Director
    - o Deputy Data Protection Officer: Stephanie King, Commercial Director
    - o **Email: DPO@samlearning.com   Tel : 0845 130 4160**

- ❖ Processing of data:
    - o The purposes of the processing;
    - o The lawful basis for the processing;
    - o The legitimate interests for the processing;
    - o The categories of personal data obtained because the personal data is not obtained from the individual it relates to – for example: the learners;
    - o The recipients or categories of recipients of the personal data;
    - o The details of transfers of the personal data to any third countries or international organisations (if applicable);
    - o The retention periods for the personal data.
    - ✔ Please see the following pages (5 to 24) as they explain in detail the points above.

What We Provide to the School's Data Control Officer (DCO)

For the SAM Learning product, the DCO has the following rights for data belonging to the School, its Staff and Learners:

I.   The right to be informed

II.   The right of access

III.   The right to rectification

IV.   The right to erasure

V.   The right to restrict processing

VI.   The right to data portability (for example: if you change product and if you cancel but then re- establish your contract, as long as this is within 90 days following the date of cancellation)

VII.   The right to object (to our DPO escalating to DCO and then the ICO as an ultimate authority)

VIII.   Rights in relation to automated decision-making and profiling.

We carry out six-monthly audits of our Data Protection Processes and documentation, following which we notify all schools with our 'Assurance of Compliance Statement'. We will provide the School or Trust with any further information requested in connection with any such audit or otherwise in connection with our data processing activities under this agreement. (See 'Audit Cycle' below.)

In the event of requests from individuals to schools regarding the above rights, we will take 'appropriate technical and organisational measures' to help the school or trust respond to those.

What We Provide to the Learners, Teachers/Admins, Staff, Parents and Guardians

The rights available to individuals in respect of the processing are:

I.   The right to withdraw consent (of their data being used)

II.   The right to lodge a complaint with a supervisory authority (see point VII above)

III.   The right to know the source of the personal data (from the school's management information system (MIS such as SIMS, Bromcom, CMIS))

IV.   The fact that it is a contractual obligation to provide the personal data so the product may be used

V.   There is no automated decision-making, including profiling within SAM Learning systems.

When We Provide It

❖   We provide individuals with privacy information at the time we collect their personal data from them.

❖   We provide all data subjects with privacy information:

   o   in this document;

   o   at the time of contracting with SAM Learning;

   o   at the time of first log-in to our platform;

   o   at the time of first log-in each academic year;

   o   every time we communicate with the individual for marketing purposes; and

   o   upon request.

How We Provide It

- ❖ We provide the information in a way that is:
  - o concise;
  - o transparent;
  - o intelligible;
  - o easily accessible; and
  - o uses clear and plain language.

Changes to the Information

- ❖ We regularly review and, where necessary, update our privacy information.

- ❖ If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

Best Practice

Drafting the information

- ❖ We undertake an information audit to find out what personal data we hold and what we do with it.

- ❖ We put ourselves in the position of the people we're collecting information about.

- ❖ We ensure that the language used in communicating our data practices is suitable for all audiences, especially when communicating with a young audience.

- ❖ We carry out user testing to evaluate how effective our privacy information is.

Delivering the information

When providing our privacy information to individuals, we use a combination of appropriate techniques, such as:

- ❖ a layered approach, including information in digital and paper formats;

- ❖ legal policies published on the SAM Learning website, platform and help centre;

- ❖ pop-up notifications on first log-in and at the beginning of each academic year;

- ❖ formal email communications; and

- ❖ paper copies always available on request.

Audit cycle

Every six months, the DPO will carry out an internal audit to ensure our continued compliance and check the GDPR responsibilities of our third-party suppliers. Managers within each department will be responsible for carrying out ongoing checks that will facilitate this audit. They will report any issues outside of the audit directly to the DPO in a timely manner. An 'Assurance of Compliance' will be communicated to all our client schools as part of each audit cycle.

Learner Data (Learners in Schools)

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
First name Last name Admission Number Gender Date of birth Registration group Year group Unique Pupil Number (UPN) School Email Address Classes Username Password Memorable question Memorable question answer SAM Learning scores	This information enables each learner to have an account and access the e-learning content. Learner data is only used to create Learner Accounts for individual progress tracking. We undertake not to use learner data for any commercial purpose. The learner data supplied by schools does not contain personal email or postal addresses or other contact details for learners and we do not ask learners for additional details after they log in. Registration group, year group and classes are used to generate Progress Reports. These contain the first name and last name of learners. First names are used on welcome screens and screens showing users' marks to give a sense of ownership. Date of birth combined with initials is used to generate User IDs for learners to log in. (Occasionally, the specific circumstances of an individual school will require a different approach, subject to mutual agreement.) Any change to this format will be timed and communicated to ensure there is no disruption to the operation of our service to your school. UPN is used to match learner records for learners moving school and for statistical research. UPN is used behind the scenes only and is not accessible by users of our platform or our own staff. For this reason UPN does not	SAM Learning's data protection notification number is Z7116737. Data is extracted from a Management Information System (MIS) via a data provisioning service such as WONDE or Groupcall or from a data file manually submitted by the school via SAM Learning's secure platform. It is then imported into the corresponding fields on SAM Learning. Manually submitted data files are deleted as soon as they have been fully processed. Only members of staff who are directly involved with the data upload have access to the data files. Staff who need to check on learner progress and help schools to use the product more efficiently can see the data about a learner and access it to move it if needed. None of our staff have access to the data kept on the school's own server. We aggregate the marks scored by learners for the purpose of our internal statistical analysis and research.	We store learner data on a secure Amazon Web Server, based in the Republic of Ireland. We hold over 600,000 Learner Records and have never had a reported abuse or breach. The server uses encryption technology and firewalls to protect it from unauthorised access. Only authorised IPs can access the servers. Keys and passwords are kept in an unreadable, closed format. Learner data may also be stored within G Suite. All SAM Learning staff must pass a DBS check which is renewed every 3 years. For details of this, please contact our DPO by emailing DPO@samlearning.com

	appear anywhere on our platform or on printed Progress Reports. Admission Numbers are used to match learners whose details may have changed since last year. We use Admission Number because other details (e.g. last name) may have changed and UPN is not available for all pupils. School Email Address is used for login purposes and only for specific purposes related to a Learner's work on SAM Learning including notification of work set, learning milestones achieved, Learner rewards and certificates, system assigned work, notification of school cancellation, periodic announcements, password and login information, new features and help.		

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
Learners are assigned passwords that protect access to the system and ensure that only teachers and learners in your school can access your learner data. No third party can access it without permission. We will not sell or disclose your personal information to anyone else. We will not use Learner Emails for sales or marketing purposes. We may disclose and talk about your marks to your parents or guardians, teachers and school as part of the service.	We also optionally collect data for Ethnicity, FSM, FSM 6, Pupil Premium, CLA, EAL and SEN. Additionally, a record of the exercises completed, marks awarded and usage of the platform is stored in each Learner Account when the learner uses SAM Learning.	Learner data will be retained for the duration of the school's contract with SAM Learning. When this contract comes to an end, we will anonymise all identifiable data on the SAM Learning platform within 90 days. We will delete all identifiable data stored in other SAM Learning systems (G Suite) within 90 days. If you wish to reactivate your subscription, you have until the end of the period outlined above to notify SAM Learning that you would like your data to be retained. After this time, all data would need to be resubmitted. Aggregated data for the purposes of statistical analysis will be retained in an anonymised format. This means it is completely impossible to tie an individual to any remaining data. This renders it inert for the GDPR's purposes.	You have the right to request the complete deletion of your data once you or your school is no longer under contract with SAM Learning. To do this, please contact the DPO by emailing DPO@samlearning.com

Teacher/Admin Data

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
First name Last name Position / job Title School role Email address Username Password Educational / subject interests Exam board used Classes	We use this information for the purposes of administration, operation of the service, customer support, marketing, sales and business development. Your email address will be used as the unique identifier for your account. We will use it to send out your log-in details to access the service. We will use your email address to send you replies to any customer service inquiry you might make and to send you the SAM Learning newsletter, which will keep you informed of changes and improvements to the services you use. The newsletter will be sent to you by email no more than once a week. From time to time, we may also contact you to offer promotions and incentives. At any time, you can opt out of receiving the newsletter by using the 'Change Preferences' or 'Unsubscribe' link. We may contact you by phone, email or post to discuss SAM Learning services, promotions or changes to your account. Likewise we may contact you to understand better what you want from us and our products and to conduct other market research. As always your data and information will be anonymised following contact when we analyse our results or publish, internally or externally, statistics. If we wish to specifically showcase your school or an aspect of it then we will always gain your permission to publish or broadcast.	SAM Learning's data protection notification number is Z7116737. Teacher data is extracted from a Management Information System (MIS) via a data provisioning service such as WONDE or Groupcall or entered manually as part of the registration process when activating your SAM Learning account. When contacting schools by telephone, we may also ask for teacher contact details. This information is stored in our Customer Relationship Management (CRM) system Solve 360. When tracking teacher engagement or for internal analysis, teacher data may also be stored in SAM Learning's G Suite. Some telephone calls may be recorded for monitoring and training purposes. These will never be shared outside of our staff.	Teachers are assigned passwords that protect access to the system. Teacher data may be stored on our secure Amazon Web Server, within G Suite, Apollo or our CRM system Solve 360. The server uses encryption technology and firewalls to protect it from unauthorised access. Only authorised IPs can access the servers. Keys and passwords are kept in an unreadable, closed format. See our *Supplier List* for Amazon Web Services, G Suite, Apollo and Solve 360 security information.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
No third party can access teacher data without permission. We will not sell or disclose your personal information to anyone else.	A record of your activity when using the service, such as usage, creation of Share activities and tasks set. Also, a record of your participation in any SAM Learning frameworks such as Three-wave Intervention. This information enables you to be contacted about further participation opportunities or Share reward schemes. It also enables evidence to be gathered for any of our school success programmes in which you are participating. SAM Learning staff have access to teacher accounts for the purposes of customer support only. Initial combined with surname is used to generate User IDs for teachers to log in.	Teacher data will be retained for the duration of the school's contract with SAM Learning. When this contract ends, we will anonymise all identifiable data on the SAM Learning platform within 90 days. We will delete all identifiable data stored in other SAM Learning systems (Solve 360, Apollo and G Suite) within 90 days. If the school wishes to reactivate its subscription, it must notify SAM Learning within the period outlined above that it would like its teacher data to be retained. After this time, all data would need to be resubmitted. Aggregated data for the purposes of statistical analysis will be retained in an anonymised format.	You have the right to request the complete deletion of your data once your school is no longer under contract with SAM Learning or if you cease employment at the school. To do this, please contact the DPO by emailing DPO@samlearning.com

WONDE or Groupcall (via Xporter on Demand - XoD) Synchronised Data

Most of our subscriber schools agree to daily synchronisation of Learner and Teacher Data via WONDE or Groupcall's XoD. Data fields synchronised are all identified above. This table aims to clarify the types of data and their use in SAM Learning.

NB - we do not collect any other information from WONDE or Groupcall that is not identified here.

Data Area	Fields Synchronised	SAM Learning Use
Staff Contractual Information	Position / job title	To target communication items e.g. Message Board appropriately.
Basic Staff Details	First name Last name Email address	To generate accounts / user IDs for teachers to log in and to enable appropriate communications.
Free Text and User Defined Fields	Pupil Number	Some MIS do not have a standard 'Admission Number' field - we need to access this from a user defined field.
Structural School Information	Teacher Classes Learner Classes	To allow for setting of tasks to a teacher's classes.
Student SEN Provision information	SEN - Yes or No	* Enables teacher filtering of reports etc. by characteristic.
Basic Student Details	First name Last name Gender Admission Number	Allow for unique identification of Learner for login access. 'Gender' enables teacher filtering of reports etc. by characteristic.
Language and Language Proficiency Information	EAL - Yes or No	* Enables teacher filtering of reports etc. by characteristic.
Student Ethnicity Data	Ethnicity	* Enables teacher filtering of reports etc. by characteristic.
Extended Student Information	Date of Birth Year Group Registration Group School Email Address	DoB allows for unique identification of Learners. Year and Reg Groups enable filtering and reporting. Email is for login and work-related communications only.
Details Relating to Student Family Arrangements	CLA - Yes or No	* Enables teacher filtering of reports etc. by characteristic.
Access to Student Additional Funding Indicators	FSM, FSM 6 - Yes or No Pupil Premium - Yes or No	* Enables teacher filtering of reports etc. by characteristic.
Access to Student UPN and Former UPN Data	UPN	Allow for unique identification of Learner for login access.

Learner Data (Home User Licence purchased via Amazon or Website / Shopify)

Not applicable to school subscriptions

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
First name Last name Date of birth Year group Gender Email address Password Memorable question Answer to memorable question SAM Learning scores	We use this information to monitor your progress and analyse your learning needs. We will use your personal data for purposes of administration and operation of the service. We may disclose your marks to your parents or guardians as part of the service. We aggregate the marks scored by learners for the purpose of our internal statistical analysis and research. Date of birth combined with initials is used to generate User IDs for learners to log in. Any change to this format will be timed and communicated to ensure there is no disruption to your service. We will use your email address to send you replies to any customer service inquiry you might make. We may use your email address to send you the SAM Learning newsletter, which will keep you informed of improvements to the platform. The newsletter will be sent to you by email no more than once a week. From time to time, we may also contact you to offer promotions relating to your special areas of interest. At any time, you can opt out of receiving the newsletter by using the 'Change Preferences' or	Learner information is required after purchasing a Home User account via Amazon.co.uk or our Website. It enables SAM Learning to set up an account for the learner.	We store learner data on a secure Amazon Web Server, based in the Republic of Ireland. We hold over 600,000 Learner Records and have never had a reported abuse or breach. The server uses encryption technology and firewalls to protect it from unauthorised access. Only authorised IPs can access the servers. Keys and passwords are kept in an unreadable, closed format. Learner data may also be stored within G Suite. All SAM Learning staff must pass a DBS check which is renewed every 3 years. For details of this, please contact our DPO by emailing DPO@samlearning.com

	'Unsubscribe' link.		

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
Learners are assigned passwords that protect access to the system and ensure that no third party can access your learner data without your permission. We will not sell or disclose your personal information to anyone else. We may disclose and talk about a learner's marks to their parents or guardians as part of the service.	A record of the exercises completed, marks awarded and usage of the platform is stored in each Learner Account when the learner uses SAM Learning.	Home User Learner data will be retained for the duration of the Home User licence. When this licence expires, we will delete all identifiable data from the platform on the last day of the subscription. The Home User licence can be cancelled at any time. Upon cancellation, we will delete all identifiable data within 24 hours. Purchaser data will be anonymised within 90 days of the end of subscription. If a learner wishes to reactivate their subscription, they must notify SAM Learning prior to the subscription end date. After this time, all data would need to be resubmitted.	To address any questions or concerns, please contact the DPO by emailing DPO@samlearning.com

Parent and Guardian Data (Home User Licence purchased online)

Not applicable to school subscriptions

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
First name Last name Email address Telephone number	We will use this information for the purposes of administration, operation of the service and customer support. We will use your email address to send you replies to any customer service inquiry you might make. We may contact you by phone, email or post to discuss SAM Learning services, promotions or changes to your account. If we wish to specifically showcase your child or an aspect of their learning then we will always have that discussion with you and gain your permission to publish or broadcast.	Parent information is required when a parent or guardian is purchasing a Home User account via Shopify on behalf of a learner. It enables SAM Learning to contact the purchaser and set up an account for the learner.	When a parent or guardian purchases a Home User account on behalf of a learner, their data is stored within Shopify and SAM Learning's G Suite. See our *Supplier List* for Amazon, Shopify and G Suite security information.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
We will not sell or disclose your personal information to anyone else.	No other data is kept.	Where parent data is stored, it will be retained for the duration of the Home User licence. When this licence expires, we will delete all identifiable data on the last day of the subscription. The Home User licence can be cancelled at any time. Upon cancellation, we will delete all identifiable data within 24 hours. Purchaser data will be anonymised within 90 days of the end of subscription.	To address any questions or concerns, please contact the DPO by emailing DPO@samlearning.com

Sales and Marketing Data (Learner Level)

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
None.	SAM Learning does not collect or store learner data for sales and marketing purposes.	No processing occurs.	No storage or security is needed.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
No sharing occurs.	No other data is kept.	Nothing needs to be kept.	Contact our DPO by emailing DPO@samlearning.com

Sales and Marketing Data (Home Licence Purchased by Parent or Guardian)

Not applicable to school subscriptions

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
None.	SAM Learning does not collect or store parent or guardian data for sales and marketing purposes.	No processing occurs.	No storage or security is needed.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
No sharing occurs.	No other data is kept.	Nothing needs to be kept.	Contact our DPO by emailing DPO@samlearning.com

Sales and Marketing Data (School Level)

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
School name School address Phone number LA, MAT or other affiliations P8 Group / Score Ofsted report link Subscription details and history Product details and history MIS System and data upload history Communication history SAM Learning usage data Teacher/Admin names Teacher/Admin email addresses Teacher/Admin job titles/roles	We will use this information for the purposes of administration, operation of the service, customer support, marketing, sales and business development.	Publicly published lists of UK schools may be used to generate sales leads and confirm contact details for existing customers. This data will be uploaded to our Customer Relationship Management system (Solve 360). We may contact schools by telephone and ask for school/teacher contact details to be confirmed. Lists of contacts may be uploaded to our email campaign software. Lists of contacts who have opted in to a communications database with a third party may be contacted on our behalf. These third parties will not use this data for any other purpose and are compliant with European data regulations. We will not sell or disclose this data to anyone else. At any time, contacts held by SAM Learning can opt out of receiving email marketing campaigns by using the 'Change Preferences' or 'Unsubscribe' link. For contacts from schools who no longer subscribe to SAM Learning, we will provide an opt-in email to update our records. Contacts who do not opt in will be removed from our email campaign software and CRM.	Data is stored on our secure services: ● G Suite ● Solve 360 ● Sendgrid ● Apollo See our *Supplier List* for G Suite, Solve 360, Apollo and Sendgrid security information.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
Data is shared with the following trusted partner companies: ● Sendgrid ● Apollo ● Survey Monkey	No other data is kept.	At the end of a school's SAM Learning subscription or upon cancellation, teachers and admins will receive an opt-in email within 90 days. If they do not opt to remain on our marketing database, we will delete all data pertaining to them. If they do opt to remain on our marketing database, they can opt out of receiving these communications at any time using the 'Change Preferences' or 'Unsubscribe' link. If the school cancels but later reactivates, teachers and admins will be reactivated on our marketing database.	You have the right to request the complete deletion of your data once your school is no longer under contract with SAM Learning or if you cease employment at the school. To do this, please use the 'Unsubscribe' link in our correspondence or contact the DPO by emailing DPO@samlearning.com See our *Supplier List* for Sendgrid, Apollo and Survey Monkey security information.

Data Handled by Finance

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
School name School address Subscription details Finance contact name Finance contact email address Finance contact telephone number School payment history	This data is stored to enable financial transactions with the school to be carried out accurately.	Financial data is included on SAM Learning order forms and invoices. The data is used to process payments, track payment history and analyse financial data.	Data is stored on our secure services: ● Autoentry; ● G Suite; ● Solve 360; ● Xero; ● Signable. Autoentry: only SAM Learning finance staff can access Autoentry. No customer data is stored. This requires a user account set up by the administrator. G Suite: only SAM Learning finance staff can access the SAM Learning finance G Suite and it is password protected. Solve 360: company username and password required. Xero: only SAM Learning finance staff and SAM Learning Accountants can access Xero. This requires a user account set up by the administrator and Xero data has an encryption password. Signable: any user requires a user account set up by administrator. See our *Supplier List* for detailed security information.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
We will not disclose your financial information to anyone else. We will not provide your financial information to anyone else, nor will it be used for any other activity.	No other data is kept.	Financial data will be retained for the duration of the school's contract with SAM Learning. When this contract ends, we will delete or otherwise destroy all financial data in line with HMRC guidelines of six years from the end of the last company financial year they relate to, or longer if they show a transaction that covers more than one of the company's accounting periods. Account history data for the purposes of financial analysis will be retained, including the school's purchasing history.	At any time, you have the right to request information on what data we hold about you or your school. To make a Subject Access Request, please contact the DPO by emailing DPO@samlearning.com

Data Handled by Service Delivery and Customer Support

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
First name Last name School name Job title / position Email address Telephone number Communication history	We use this data to respond to service delivery and customer support enquiries and enable staff to assist users with the service.	Data submitted via email, our support centre and the SAM Learning 'Contact Us' link is collected and ordered via a ticketing system using our third-party tool Zendesk. Access to this data is password protected and authenticated via single sign-on.	Data is kept within G Suite, Zendesk, Apollo and Solve 360. Only authorised SAM Learning staff and dedicated SaaSy People Customer Service staff have access to Zendesk, G Suite and Solve 360. Access to this data is password protected. Dedicated SaaSy People Customer Service support staff have access to Zendesk and Solve 360. Access to this data is password protected. Data relating to customer enquiries is only accessed for the purpose of SAM Learning operations and is not shared with any other third parties. See our *Supplier List* for Zendesk, G Suite, Apollo and Solve 360 security information. (ZenDesk is a US company which has obtained approval for its [Binding Corporate Rules]("BCRs") as a data processor for its customers' data, which provides its customers with a robust mechanism to facilitate transfers of personal data from the EEA to members of the Zendesk family of companies when using our services. Further information is available in their [press release]. In addition, their Data Processing Agreement (DPA) incorporates the EU Model Clauses.)

Is the data shared and is it secure?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
Apart from where the data is stored, it is not shared beyond appropriate SAM Learning personnel.

We have ensured all our data sharing with third parties protects personal data protection rights as already established under EU Law.

To comply with the GDPR, any data shared with third parties must be within the EU or to companies who comply fully with the personal protections within EU Law and the GDPR. | No other data is kept. | Any data you give us will be held for as long as is necessary in order to fulfil your communication need or for a maximum of 12 months, whichever is sooner. | You have the right to request the complete deletion of your data once your school is no longer under contract with SAM Learning or if you cease employment at the school.

To do this, please contact the DPO by emailing DPO@samlearning.com |

Data Handled by Contracted Third Party Suppliers

Item of Data or Information	What we keep and why we have it.	How we process it.	Where is it kept and how is it kept secured?
All of the data and information items mentioned on the previous pages. Where we employ a sub-processor, we will ensure that a contract is in place imposing the same data protection obligations (e.g. Article 28(3) etc.) on that sub-processor. (The wording of these obligations do not need to exactly mirror those set out in the contract between the SAM Learning and the School/Trust, but will offer an equivalent level of protection for the personal data.)	We will use third-party tools and services for the purposes of administration, operation of the service, customer support, statistical analysis (such as FFT), marketing, sales and business development. These third parties may need to access customer data. All third parties have their own privacy policies in place and are compliant with European and UK data regulations. They will not use this data for any other purposes. No further sub-processors of school data will be used without the consent of customers. We will inform customers as and when we add further third-party suppliers, at which time customers will have the right to withdraw their consent.	Learner and teacher data is uploaded to our platform to enable operation of the service. Data provisioning services may be provided by WONDE or Groupcall. Hosting services are provided by Amazon Web Services. School and teacher data is stored in our Customer Relationship Management system (Solve 360) and other third-party databases (Zendesk, Apollo and Sendgrid) to enable customer support, service delivery, marketing, sales and business development. Schools' financial data is stored on our secure servers and in Xero to facilitate payment processing, tracking and financial analysis.	SAM Learning, while primarily based and operating in the UK, also has people and operations in the EU and worldwide. SAM Learning also uses a range of international third-party tools and suppliers to carry out its operations, all having their own privacy policies and complying with European data regulations and the Data Protection Act 2018. SAM Learning regularly reviews its list of third-party suppliers and carries out checks on their Privacy Policies and GDPR Compliance Documentation.

Is the data shared?	Data we might also keep & why would we have this?	How long will any data be kept?	Who to contact with questions or concerns.
Please see the attached list for a full list of our third-party suppliers. For further information, please contact our DPO by emailing DPO@samlearning.com	No other data is kept.	Third-party suppliers will only have access to our data while they are under contract with SAM Learning. After this time, this access will be immediately removed and the supplier will be required to delete or otherwise destroy all data as soon as possible and in line with the GDPR and the DPA. Please contact our DPO by emailing DPO@samlearning.com for further information about the data handling and data retention of our third-party suppliers.	You have the right to request the complete deletion of your data once your school is no longer under contract with SAM Learning or if you cease employment at the school. To do this, please contact the DPO by emailing DPO@samlearning.com

Supplier List

Supplier	Used for	Security and Privacy Policies
Amazon	Reward vouchers	https://www.amazon.co.uk/gp/help/customer/display.html?nod eId=502584
Amazon Web Services	Web hosting	https://aws.amazon.com/compliance/data-privacy-faq/ https://aws.amazon.com/compliance/gdpr-center/ https://aws.amazon.com/agreement/ https://aws.amazon.com/compliance/shared-responsibility-model/
Apollo	Sales, Marketing and Customer communications	https://www.apollo.io/privacy-policy/ https://knowledge.apollo.io/hc/en-us/articles/4409141087757-General-Data-Protection-Regulation-GDPR-Overview
Autoentry	Finance	https://www.autoentry.com/privacy-policy
Calendly	Booking meetings with staff	https://help.calendly.com/hc/en-us/articles/360007032633-GDPR-FAQs#1
CorrectGroup	IT support	requested 19/1/21 - document provided.
Demystify	Sales and Marketing	https://www.demystifi.io/privacy-policy
DPC Accountants	Finance	https://www.dpcaccountants.com/privacy-statement/
EdTech Impact	Marketing	https://edtechimpact.com/privacy
Expensify	Expense processing	https://use.expensify.com/privacy
Facebook	Marketing	https://www.facebook.com/about/privacy
Focus Group	Telephony	https://focusgroup.co.uk/information/gdpr/ https://focusgroup.co.uk/information/privacy-and-cookies-policy/
G Suite	Company operations	https://gsuite.google.co.uk/intl/en_uk/faq/security/
Groupcall	Data provisioning	https://www.groupcall.com/privacy https://www.groupcall.com/our-gdpr-compliance
ISC Research Ltd	International Schools Data	https://iscresearch.com/privacy-policy/ https://iscresearch.com/gdpr/
Leytons	R&D Tax Credits	https://www.leyton.com/en/united-kingdom/privacy-fair-processing-notice
LinkedIn	Professional communications	https://www.linkedin.com/legal/privacy-policy
Mailchimp	Marketing Communications	https://mailchimp.com/legal/privacy/?_ga=2.232776345.740882245.1611321571-1613345807.1611321571
SaaSy People	Customer Services	https://thesaasypeople.com/ https://thesaasypeople.com/gdpr-information
Sendgrid (Twilio)	Customer communications	https://www.twilio.com/legal/privacy

Shopify	Online Sales - Home Users	https://help.shopify.com/en/manual/your-account/privacy/ GDPR
Signable	Finance	https://www.signable.co.uk/privacy-policy/ https://www.signable.co.uk/legal/ https://www.signable.co.uk/gdpr/ https://www.signable.co.uk/compliance-and-data-security/
Solve 360	Company operations (CRM)	https://solve360.com/privacy-policy/
Stripe	Online Sales - Home Users	https://stripe.com/gb/privacy
Survey Monkey	Customer communications	https://www.surveymonkey.co.uk/mp/legal/security/
Twitter	Marketing	https://twitter.com/en/privacy
Vimeo	CPD Video Hosting	https://vimeo.com/privacy
WONDE	Data provisioning	https://www.wonde.com/security/ https://www.wonde.com/wp-content/uploads/Data-Processing-Agreement-Wonde.pdf https://www.wonde.com/wp-content/uploads/School-Data-Information-Security-Overview-V1.0.pdf https://www.wonde.com/wp-content/uploads/Privacy-Notice-Wonde.pdf
WordPress	Website maintenance -including WP forms	(They do not hold any data for us - rather aid in directing it to us.)
Xero	Finance (to replace Sage)	https://www.xero.com/uk/about/legal/privacy/
You can book.me	Booking calls with staff	https://www.youcanbook.me/privacy/ https://support.youcanbook.me/article/375-ycbm-and-gdpr-privacy-and-data-protection
Zendesk	Customer support	https://www.zendesk.co.uk/company/policies-procedures/data- deletion-policy/
Zero Bounce	Marketing	https://www.zerobounce.net/gdpr.html https://www.zerobounce.net/assets/zb_data_processing_agreement.pdf https://www.zerobounce.net/docs/about-zerobounce/#data_protection

SAM Learning Responsibilities for Data Protection