



Data Transferred Outside of the United Kingdom

UK and Europe

The **Data Protection Act 2018** is the **UK's** implementation of the General **Data Protection Regulation (GDPR)**. Initially with the same standards.

UK and US

“On the 16th of July 2020, the Court of Justice of the European Union (“CJEU”) issued their decision in case C-311/18, also known as *Schrems II*. The CJEU’s decision confirmed the validity of the European Commission Controller-Processor Standard Contractual Clauses (“SCCs”) while invalidating the EU-US Privacy Shield Framework as a mechanism to transfer personal data from the EU to the US.”

SAM Learning’s Data Overseas

1. Our main data is held on Amazon Web Servers (AWS) in Dublin
 - This is where all of our functional Teacher and Learner Data is stored / accessed
 - They follow EU GDPR procedures.
2. Zendesk is our Support Platform
 - The only data stored here is that involved in customer support work.
 - It is based in the US.
 - They have taken appropriate measures (via SCCs) to ensure that EU Data standards are met: <https://www.zendesk.co.uk/blog/update-privacy-shield-invalidation-european-court-justice/>
3. SendGrid
 - We use this to send emails to targeted list of customer emails; both subscribes and for sales
 - SendGrid also has SCCs in place, as discussed here: <https://sendgrid.com/blog/how-the-recent-privacy-shield-ruling-impacts-twilio-sendgrid-users/>
4. Solve 360
 - This is our CRM - holding information on our customers; at an organisation and individual level (typical 4 key contacts per school); also communications logs, order forms etc.
 - They are a Canadian company - so the EU-US Privacy Shield does not apply to them. Having said that, most of their data is stored on US AWS Servers.
 - They maintain standards in line with GDPR, as stated here: <https://solve360.com/gdpr/>
5. Apollo.io
 - We use this to send emails to targeted list of customer emails; both subscribes and for sales
 - They maintain standards in line with GDPR, as stated here: <https://www.apollo.io/privacy-policy/> and <https://knowledge.apollo.io/hc/en-us/articles/4409141087757-General-Data-Protection-Regulation-GDPR-Overview>