

April 2018
Updated December 2018

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.

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.

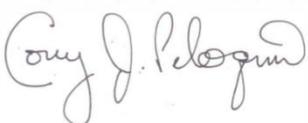
By default, we keep personal information only for the amount of time necessary to provide the SAM Learning product and service. I assure you that the information and audits in this booklet demonstrate that only the minimum data required to complete our service and business functions are used.

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/legal/>. For any queries related to this documentation, please use the details on the back page to contact SAM Learning's DPO.

Yours faithfully,



Corey Peloquin
Chief Operations Officer
SAM Learning

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Privacy Information Provided to Schools

We provide schools with the following privacy information:

- ❖ The name and contact details of our organisation:
 - Registered Office: SAM Learning Limited, 3rd Floor, 29–30 High Holborn, London, WC1V 6AZ. Registered in England. No. 2826785

- ❖ The name and contact details of our Data Controller:
 - Corey Peloquin, Chief Operations Officer
 - **Email: cpeloquin@samlearning.com Tel: 0845 130 4160**

- ❖ The name and contact details of our Data Protection Officer (DPO):
 - Data Protection Officer: Damien Keogh, School Success Manager
 - Deputy Data Protection Officer: Sameera Deen, Customer Service and Data Executive
 - **Email: DPO@samlearning.com Tel : 0845 130 4160**

- ❖ Processing of data:
 - The purposes of the processing;
 - The lawful basis for the processing;
 - The legitimate interests for the processing;
 - The categories of personal data obtained because the personal data is not obtained from the individual it relates to – for example: the learners;
 - The recipients or categories of recipients of the personal data;
 - The details of transfers of the personal data to any third countries or international organisations (if applicable);
 - The retention periods for the personal data.

- ✓ Please see the following pages (6 to 23) 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.

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:
 - in this document;
 - at the time of contracting with SAM Learning;
 - at the time of first log-in to our platform;
 - at the time of first log-in each academic year;
 - every time we communicate with the individual for marketing purposes; and
 - upon request.

How We Provide It

- ❖ We provide the information in a way that is:
 - concise;
 - transparent;
 - intelligible;
 - easily accessible; and
 - 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?
<p>First name</p> <p>Last name</p> <p>Admission Number</p> <p>Gender</p> <p>Date of birth</p> <p>Registration group</p> <p>Year group</p> <p>Unique Pupil Number (UPN)</p> <p>Classes</p> <p>Username</p> <p>Password</p> <p>Memorable question</p> <p>Memorable question answer</p> <p>SAM Learning scores</p>	<p>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 email or postal addresses or other contact details for learners and we do not ask learners for additional details after they log in.</p> <p>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.</p> <p>Date of birth combined with initials is used to generate User IDs for learners to log in. A revision to this format is scheduled to be made during 2019. Any change will be timed and communicated to ensure there is no disruption to the operation of our service to your school.</p> <p>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 appear anywhere on our platform or on printed Progress Reports.</p> <p>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.</p>	<p>SAM Learning's data protection notification number is Z7116737.</p> <p>Data is extracted from a Management Information System (MIS) via a direct sync (SIMS sync), via a data provisioning service such as 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.</p> <p>Manually submitted data files are deleted as soon as they have been fully processed.</p> <p>Only members of staff who are directly involved with the data upload have access to the data files.</p> <p>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.</p> <p>We aggregate the marks scored by learners for the purpose of our internal statistical analysis and research.</p>	<p>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.</p> <p>The server uses encryption technology and firewalls to protect it from unauthorised access.</p> <p>Only authorised IPs can access the servers. Keys and passwords are kept in an unreadable, closed format.</p> <p>Learner data may also be stored within G Suite.</p> <p>All SAM Learning staff must pass a DBS check which is renewed each year. For details of this, please contact our DPO by emailing DPO@samlearning.com</p>

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.
<p>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.</p> <p>No third party can access it without permission.</p> <p>We will not sell or disclose your personal information to anyone else.</p> <p>We may disclose and talk about your marks to your parents or guardians, teachers and school as part of the service.</p>	<p>We also optionally collect data for Ethnicity, FSM, FSM 6, Pupil Premium, CLA, EAL and SEN.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>A notification within the platform will alert users who turn 16 years of age to their rights in regard to their personal data.</p>	<p>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</p>

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?
<p>First name</p> <p>Last name</p> <p>Position / job Title</p> <p>Email address</p> <p>Username</p> <p>Password</p> <p>Educational / subject interests</p> <p>Classes</p>	<p>We use this information for the purposes of administration, operation of the service, customer support, marketing, sales and business development.</p> <p>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 fortnight. From time to time, we may also contact you to offer promotions and teacher incentives. At any time, you can opt out of receiving the newsletter by using the 'Change Preferences' or 'Unsubscribe' link.</p> <p>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 have that discussion with you and gain your permission to publish or broadcast.</p>	<p>SAM Learning's data protection notification number is Z7116737.</p> <p>Teacher data is entered as part of the log-in process when activating your SAM Learning account.</p> <p>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.</p> <p>When tracking teacher engagement or for internal analysis, teacher data may also be stored in SAM Learning's G Suite.</p>	<p>Teachers are assigned passwords that protect access to the system.</p> <p>Teacher data may be stored on our secure Amazon Web Server, within G Suite or our CRM system Solve 360.</p> <p>The server uses encryption technology and firewalls to protect it from unauthorised access.</p> <p>Only authorised IPs can access the servers. Keys and passwords are kept in an unreadable, closed format.</p> <p>See our <i>supplier list</i> for Amazon Web Services, G Suite and Solve 360 security information.</p>

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.
<p>No third party can access teacher data without permission.</p> <p>We will not sell or disclose your personal information to anyone else.</p>	<p>A record of your activity when using the service, such as usage, creation of Share activities and tasks set.</p> <p>Also, a record of your participation in any SAM Learning frameworks such as Three-wave Intervention.</p> <p>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.</p> <p>SAM Learning staff have access to teacher accounts for the purposes of customer support only.</p> <p>Initial combined with surname is used to generate User IDs for teachers to log in. A revision to this format is scheduled to be made during 2019. Any change will be timed and communicated to ensure there is no disruption to the operation of our service to your school.</p>	<p>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 and G Suite) within 90 days.</p> <p>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.</p> <p>Aggregated data for the purposes of statistical analysis will be retained in an anonymised format.</p>	<p>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.</p> <p>To do this, please contact the DPO by emailing DPO@samlearning.com</p>

Learner Data (Home User Licence purchased from Amazon)

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?
<p>First name</p> <p>Last name</p> <p>Date of birth</p> <p>Year group</p> <p>Gender</p> <p>Email address</p> <p>Password</p> <p>Memorable question</p> <p>Memorable question answer</p> <p>SAM Learning scores</p>	<p>We use this information to monitor your progress and analyse your learning needs. We will also 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.</p> <p>We aggregate the marks scored by learners for the purpose of our internal statistical analysis and research.</p> <p>Date of birth combined with initials is used to generate User IDs for learners to log in. A revision to this format is scheduled to be made during 2019. Any change will be timed and communicated to ensure there is no disruption to the operation of our service to your school.</p> <p>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 changes and improvements to the platform. The newsletter will be sent to you by email no more than once a fortnight. 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 'Unsubscribe' link.</p>	<p>Learner information is required after purchasing a Home User account via Amazon.co.uk. It enables SAM Learning to set up an account for the learner.</p>	<p>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.</p> <p>The server uses encryption technology and firewalls to protect it from unauthorised access.</p> <p>Only authorised IPs can access the servers. Keys and passwords are kept in an unreadable, closed format.</p> <p>Learner data may also be stored within G Suite.</p> <p>All SAM Learning staff must pass a DBS check which is renewed each year. For details of this, please contact our DPO by emailing DPO@samlearning.com</p>

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.
<p>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.</p> <p>We may disclose and talk about your marks to your parents or guardians as part of the service.</p>	<p>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.</p>	<p>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 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.</p> <p>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.</p> <p>A notification within the platform will alert users who turn 16 years of age to their rights in regard to their personal data.</p>	<p>To address any questions or concerns, please contact the DPO by emailing DPO@samlearning.com</p>

Parent and Guardian Data (Home User Licence purchased from Amazon)

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?
<p>First name</p> <p>Last name</p> <p>Email address</p> <p>Telephone number</p>	<p>We will use this information for the purposes of administration, operation of the service and customer support.</p> <p>We will use your email address to send you replies to any customer service inquiry you might make.</p> <p>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.</p>	<p>Parent information is required when a parent or guardian is purchasing a Home User account via Amazon.co.uk on behalf of a learner. It enables SAM Learning to contact the purchaser and set up an account for the learner.</p>	<p>When a parent or guardian purchases a Home User account on behalf of a learner, their data is stored within Amazon.co.uk and SAM Learning's G Suite.</p> <p>See our <i>supplier list</i> for Amazon and G Suite security information.</p>

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.
<p>We will not sell or disclose your personal information to anyone else.</p>	<p>No other data is kept.</p>	<p>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.</p>	<p>To address any questions or concerns, please contact the DPO by emailing DPO@samlearning.com</p>

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?
<p>School name</p> <p>School address</p> <p>Phone number</p> <p>LA or other affiliations</p> <p>P8 Group / Score</p> <p>Ofsted report link</p> <p>Subscription details and history</p> <p>Product details and history</p> <p>MIS System and data upload history</p> <p>Communication history</p> <p>SAM Learning usage data</p> <p>Teacher/Admin names</p> <p>Teacher/Admin email addresses</p> <p>Teacher/Admin job titles/roles</p>	<p>We will use this information for the purposes of administration, operation of the service, customer support, marketing, sales and business development.</p>	<p>Publically 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).</p> <p>We may contact schools by telephone and ask for school/teacher contact details to be confirmed.</p> <p>Lists of contacts may be uploaded to our email campaign software.</p> <p>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.</p> <p>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.</p>	<p>Data is stored on our secure services:</p> <ul style="list-style-type: none"> • G Suite • Solve 360 • Sendgrid/Mailchimp <p>See our <i>supplier list</i> for G Suite, Solve 360, Sendgrid and Mailchimp security information.</p>

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.
<p>Data is shared with the following trusted partner companies:</p> <ul style="list-style-type: none"> • Mailchimp • Sendgrid • Sprint • Survey Monkey 	<p>No other data is kept.</p>	<p>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.</p> <p>If they do not opt to remain on our marketing database, we will delete all data pertaining to them.</p> <p>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.</p> <p>If the school cancels but later reactivates, teachers and admins will be reactivated on our marketing database.</p>	<p>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.</p> <p>To do this, please use the 'Unsubscribe' link in our correspondence or contact the DPO by emailing DPO@samlearning.com</p> <p>See our <i>supplier list</i> for Sendgrid, Survey Monkey, Mailchimp and Sprint's security information.</p>

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: <ul style="list-style-type: none"> • SAM Learning server and backed up off-site by Back-up Technologies; • G Suite; • Solve 360; • Sage (cloud-based); • Signable. Finance drive: only SAM Learning finance staff have access to the SAM Learning Finance drive. It is VPN and password protected. 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. Sage: only SAM Learning finance staff can access Sage. This requires a user account set up by the administrator and Sage data has an encryption password. Signable: any user requires a user account set up by administrator. See our <i>supplier list</i> 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.
<p>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.</p>	<p>No other data is kept.</p>	<p>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.</p> <p>Account history data for the purposes of financial analysis will be retained, including the school's purchasing history.</p>	<p>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</p>

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?
<p>First name</p> <p>Last name</p> <p>School name</p> <p>Job title / position</p> <p>Email address</p> <p>Telephone number</p> <p>Communication history</p>	<p>We use this data to respond to service delivery and customer support enquiries and enable staff to assist users with the service.</p>	<p>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.</p> <p>Access to this data is password protected and authenticated via single sign-on.</p>	<p>Data is kept within G Suite, Zendesk and Solve 360.</p> <p>Only authorised SAM Learning staff have access to Zendesk, G Suite and Solve 360.</p> <p>Access to this data is password protected.</p> <p>Data relating to customer enquiries is only accessed for the purpose of SAM Learning operations and is not shared with any other third parties.</p> <p>See our <i>supplier list</i> for Zendesk, G Suite and Solve 360 security information.</p>

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.
<p>Apart from where the data is stored it is not shared beyond appropriate SAM Learning personnel.</p> <p>We have ensured all our data sharing with third parties protects personal data protection rights as already established under EU Law.</p> <p>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.</p>	<p>No other data is kept.</p>	<p>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.</p>	<p>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.</p> <p>To do this, please contact the DPO by emailing DPO@samlearning.com</p>

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?
<p>All of the data and information items mentioned on the previous pages.</p>	<p>We will use third-party tools and services for the purposes of administration, operation of the service, customer support, 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 data regulations. They will not use this data for any other purposes.</p>	<p>Learner and teacher data is uploaded to our platform to enable operation of the service. Data provisioning services may be provided by Groupcall. Hosting services are provided by Amazon Web Services.</p> <p>School and teacher data is stored in our Customer Relationship Management system (Solve 360) and other third-party databases (Zendesk, Mailchimp, Sendgrid) to enable customer support, service delivery, marketing, sales and business development.</p> <p>Schools' financial data is stored on our secure servers and in Sage to facilitate payment processing, tracking and financial analysis.</p>	<p>SAM Learning, while primarily based and operating in the UK, also has people and operations in the EU and worldwide.</p> <p>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.</p> <p>SAM Learning regularly reviews its list of third-party suppliers and carries out checks on their Privacy Policies and GDPR Compliance Documentation.</p>

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.
<p>Please see the attached list for a full list of our third-party suppliers.</p> <p>For further information, please contact our DPO by emailing DPO@samlearning.com</p>	<p>No other data is kept.</p>	<p>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 European data regulations.</p> <p>Please contact our DPO by emailing DPO@samlearning.com for further information about the data handling and data retention of our third-party suppliers.</p>	<p>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.</p> <p>To do this, please contact the DPO by emailing DPO@samlearning.com</p>

Supplier List

Supplier	Used for	Security and Privacy Policies
Amazon	Reward vouchers	https://www.amazon.co.uk/gp/help/customer/display.html?nodeId=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/
Back-up Technology	Server back-up	https://www.backup-technology.com/privacy-policy
Facebook	Marketing	https://www.facebook.com/about/privacy
Groupcall	Data provisioning	https://www.groupcall.com/privacy https://www.groupcall.com/our-gdpr-compliance
G Suite	Company operations	https://gsuite.google.co.uk/intl/en_uk/faq/security/
Instagram	Marketing	https://help.instagram.com/155833707900388
joinMe	Customer communications	https://www.join.me/security https://www.logmeininc.com/legal/privacy
Mail Chimp	Marketing	https://mailchimp.com/legal/privacy/
Sage	Finance	https://www.sagepay.co.uk/policies/security-policy
Sendgrid	Customer communications	https://sendgrid.com/policies/security/ https://sendgrid.com/policies/privacy/
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/
Sprint	Marketing	https://www.sprint-education.co.uk/legal
Survey Monkey	Customer communications	https://www.surveymonkey.co.uk/mp/legal/security/
Twitter	Marketing	https://twitter.com/en/privacy
Zendesk	Customer support	https://www.zendesk.co.uk/company/policies-procedures/data-deletion-policy/

Organogram for Data Protection

