



The EverLearner

Privacy Policy

Updated June 2021

Privacy policy

At The EverLearner Ltd, we respect your privacy and are committed to protecting your personal information. This policy explains how we collect information, what we do with it and what controls you have over your personal information when using our website, theeverlearner.com.

Your Privacy

We take our duty to process your personal information very seriously.

We may change this document from time to time to reflect the latest processing requirements. Please check back frequently in case changes have been made since your last visit. You will be able to see if changes have been made by the date it was last updated at the end of the document.

Where we refer to "Users" throughout this policy this includes Teachers, Heads of Department, Coaches and School Admins. When we refer to "Students" we are referring to those who use the platform for online learning.

Refer to the sections below for more details on how and why we use your personal information.

Website Usage

When you are browsing our website, we use cookies to ensure that the website works as expected, maintains your security and provides TheEverLearner with anonymous data on how you interact with the website. You will be given the option to agree to our use of these cookies when you first visit the website on each new browser or computer

When you use the on-site support

When you communicate with us via our onsite support (chatbot), we will only collect minimal personal information in order to identify you to us so that we can provide you with a personalised response should you require it. You are able to interact directly with the chatbot to resolve most of your queries without providing any personal information apart from the nature of your problem.

When you contact us via email

When you make an inquiry via email, the information in the email will only be used to respond to your request or question and not for any other purpose.

When you sign up for a free trial

The EverLearner encourages those considering using our online platform to take up the offer of a free trial, which gives full access to the platform for a limited period of time. In order to start a free trial, we need to collect information about the lead person (School Admin) on the subscription (minimally, though not exclusively, name, email address and phone number), the school (name, address) and payment details (minimally finance department contact details). For certain subscription types, we also use a third party

service to process payments. This information is gathered to provide a seamless transition from the free trial to the paid subscription, and you will not incur any charges before the end of your trial period.

When you become a User of our online learning platform

Access to our online learning platform is available through a secure, encrypted portal on TheEverLearner.com website. When you become a User of the learning platform, we gather minimal information about you to allow us to administer your account. The School Admin (or Coach) or a Head of Department will be responsible for creating an account for each additional User (School Admin, Head of Department and Teachers) and Student. School Admins, Coaches, Heads of Department and Teachers can monitor and manage the Students' usage of the platform including their progress data. The staff at TheEverLearner do not access any User or Student's information unless there is an issue with their account that the School Admin, Head of Department or Teacher cannot resolve.

After you or your school becomes a customer, we reserve the right to contact School Admins, Coaches, Heads of Department and Teachers regarding changes, updates and developments to the platform and your subscription. This is in The EverLearner's legitimate interest and forms part of our service contract with you to ensure uninterrupted access to the platform and the security of your Users' and Students' information .

When you take part in online research or surveys

Occasionally, we ask for feedback on your interaction with the platform, our services and your user experience. We will use a secure, encrypted online service to gather your responses which may include your name and minimal contact details, in case we need to contact you to follow up on your answers.

The information we need

The EverLearner is what's known as the 'data controller' of the personal information you provide to us. Your relationship with us determines how much information we collect from you. We will only ever collect the minimal information needed to provide you with advice, guidance and services.

We will be very clear with you about the reason for collecting information and how we intend to use, share and store that information at the time of collection.

Collecting your personal information

We collect personal information about you through a variety of different methods, including when you:

- use our on-site support (chatbot) system;
- ask for more information;
- send us correspondence via email;
- become a User of our online services; and
- give us feedback.

Students

The EverLearner website provides an online learning environment for Students. The User creating the Student's account will be an adult who will retain ultimate responsibility for the management of that account. This may be a Teacher, Head of Department, Coach or School Admin. During account creation, the Student's

first name, last name and email address will be requested, although it is possible to create a Students' account with anonymised information.

Each Student is assigned a unique login name based on their first name and last name and an account is automatically created for their sole use by the platform. A password is generated automatically and sent to the Student's email account. Their User (the adult responsible for the account) will have access to the progress for that Student and is able to run reports on behaviours in each lesson.

Where is your information stored?

Wherever possible, all the personal information we process is processed within the United Kingdom. Some of our third-party service providers, such as our Customer Relationship Management platform, are based outside the EEA so their processing of your personal information will involve a transfer outside the UK. Student information is only stored on our website and the servers in the UK and is not processed by any Customer Relationship Management platform..

Whenever we transfer your personal information outside of the UK, we do our best to make sure a similar degree of security of personal information by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission or the Information Commissioner's Office; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission or Information Commissioner's Office which give personal information the same protection it has in the UK.

If you fail to provide the information requested

If you fail to provide the information requested where we need the personal information for either legal or accounting purposes or to fulfil our contract with you, we may need to cancel your services. Before cancelling your services, we will notify you that you are required to provide the missing information and give you a further reminder before cancellation.

Sharing your information

We do not share your information with any other organisations or individuals unless we are obliged to by law, for purposes of national security, taxation and criminal investigations and in the following instances:

- If you have agreed that we may do so;
- If we sell the business – the new owner may obtain subscriber and past client information. This information would only be used for the same purposes for which it was originally obtained;
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your personal information when you register.

And we will never sell or rent your personal information to other organisations.

Retaining your information

We hold your information only as long as necessary for each reason that we use it. For example, if you purchase access to our online learning platform, we will retain that information for up to seven years for accounting purposes. During the retention period we ensure the security and integrity of the information.

What are your rights?

You have a number of rights about how the personal information you provide can be used. These are:

- Transparency over how we use your personal information (right to be informed).
- The ability to request a copy of the information we hold about you, which will be provided to you within one month (right of access).
- Update or amend the information we hold about you if it is wrong (right of rectification).
- Ask us to stop using your information (right to restrict processing).
- Ask us to remove your personal information from our records (right to be 'forgotten').
- Object to the processing of your information for marketing purposes (right to object).
- Obtain and reuse your personal information for your own purposes (right to data portability).
- Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you wish to raise a complaint about how we have handled your personal information, you can contact us, and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you may complain to the Information Commissioner's Office (ICO).

If you would like to know more about your rights under data protection law, you can find out more at the Information Commissioner's Office website.

Use of Facebook Pixel

We use the "visitor action pixels" from Facebook on our subdomain pages.theeverlearner.com (not on our main site, TheEverLearner.com).

This allows user behaviour to be tracked after they have been redirected to one of the pages on our subdomain pages.theeverlearner.com by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us (we do not see the personal data of individual users). However, this data is stored and processed by Facebook. Facebook may link this information to your Facebook account and use it for its own promotional purposes, in accordance with *Facebook's Data Usage Policy*:

<http://www.facebook.com/about/privacy>

You can allow Facebook and its partners to place ads on and off Facebook. A cookie may also be stored on your computer for these purposes. You can object to the collection of your data by Facebook pixel or to the use of your data for the purpose of displaying Facebook ads by changing your preferences:

<http://www.facebook.com/settings?tab=ads>

Facebook is certified under the Privacy Shield Agreement:

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC>

and thus guarantees compliance with European data protection legislation.

Facebook Pixel is not installed on our main domain, TheEverLearner.com.

Use of Twitter Pixel

We use the “visitor action pixels” from Twitter on our subdomain pages.theeverlearner.com (not on our main site, TheEverLearner.com).

This allows user behaviour to be tracked after they have been redirected to one of the pages on our subdomain pages.theeverlearner.com by clicking on a Twitter ad. This enables us to measure the effectiveness of Twitter ads for statistical and market research purposes. The data collected in this way is anonymous to us (i.e. we do not see the personal data of individual users). However, this data is stored and processed by Twitter. Twitter may link this information to your Twitter account and use it for its own promotional purposes, in accordance with Twitter’s Privacy <https://twitter.com/en/privacy>. You can allow Twitter and its partners to place ads on and off Twitter. A cookie may also be stored on your computer for these purposes. You can object to the collection of your data by Twitter pixel or to the use of your data for the purpose of displaying Twitter ads by changing your preferences:

https://twitter.com/settings/off_twitter_activity

Twitter is certified under the Privacy Shield Agreement:

<https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO>

and thus guarantees compliance with European data protection legislation.

Twitter Pixel is not installed on our main domain, TheEverLearner.com.

Use of Google Analytics

We use Google Analytics to collect information about how users interact with TheEverLearner.com and how the website performs. The data is anonymised before being used for analytics and web performance processing.

Google Analytics processes anonymised information about the pages a user visits, how long users spend on each page, how users got to the site and what users click on while they’re visiting the site.

We do not have access to or store personal information (like name, address or email address) through Google Analytics. We will not identify users through analytics information and we will not combine analytics information with other data sets in a way that would identify who users are.

Use of cookies

Cookies are small text files that can be used by our website to make a user’s experience more efficient. The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Functionality cookies enable or maintain certain functionality on the website. Without these cookies, certain features of the website will not function.

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Cookies on the domain TheEverLearner.com: we use necessary cookies, statistics cookies and functionality cookies. We also use a HubSpot cookie (for the chat history, to remember previous interactions). Necessary cookies, statistics cookies and functionality cookies are essential. Users can opt out of certain cookies (like the HubSpot cookie) through the warnings displayed on the site. We do not use marketing cookies on TheEverLearner.com

Cookies on the subdomain pages.TheEverLearner.com: we use necessary cookies, statistics cookies and functionality cookies. We also use a HubSpot cookie (for the chat history, to remember previous interactions), two Facebook cookies and a CloudFlare cookie (for distributed delivery of content). Necessary cookies, statistics cookies, functionality cookies and distributed delivery cookies are essential. Users can opt out of certain cookies (like the HubSpot cookie and the Facebook cookie) through the warnings displayed on the site or by adjusting their settings on their Facebook account.

For details on cookies used, please see our cookie information:

https://theeverlearner.com/uploads/images/policies/cookie_information_2021_06_17.pdf

How to contact us

If you wish to talk through anything in our privacy policy, find out more about your rights or obtain a copy of the information we hold about you, please contact us by emailing privacy@theeverlearner.com and we will be happy to help.

About Us

The EverLearner Limited is registered with the Information Commissioner's Office as a Data Controller. Our registration number is ZA382932.

The EverLearner Limited is a company registered in England and Wales, (registered company number 10233758) whose registered office is 68 Park Road, Farnborough, Hampshire, United Kingdom, GU14 6LU.

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