

FFT Education Privacy Notice: Reciprocal Reading

Introduction

This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our websites, products or services (“services”).

We’ll tell you:

- why we are able to process your information;
- what purpose we are processing it for;
- how long we store it for;
- whether there are other recipients of your personal information;
- whether we intend to transfer it to another country; and

FFT takes your privacy very seriously. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing your personal information. This is so that you are fully aware of how and why we are using your data. This privacy notice supplements any other notices and is not intended to override them.

About FFT

FFT Education Limited (FFT) is a not-for-profit limited liability company incorporated in England and Wales under the company number 03685684 (referred to as “we”, “us”, “our” and “FFT” in this notice).

FFT is the data controller for the personal information we process, unless otherwise stated. This is defined within our Terms and Conditions for the products and services we offer.

There are a number of ways for you to contact us, including by phone, email and post.

Our postal address is:

FFT Education Ltd
1st Floor
79 Eastgate
Cowbridge
Vale of Glamorgan
CF71 7AA
Telephone: 01446 776262
Email: dpo@fft.org.uk

Data Protection Officer’s contact details

Our Data Protection Officer is Helen Robinson. You can contact her at dpo@fft.org.uk or via our postal address. Please mark the envelope FAO Data Protection Officer.

What information we collect about you

Personal data or personal information means any information about an individual from which the person can be identified. It does not include data where the identity cannot be ascertained (anonymised data).

FFT may collect, use, store and transfer the following kinds of personal data about you:

- Identity data such as Full name, username, email address, job title.
- Contact data such as employer, work address country of residence, phone number, email address.
- Profile data such as username, password, interests, preferences, feedback, survey responses and training received.
- Usage data such as information about how you use our services.
- Technical data such as internet protocol (IP) address, login data, browser type and version, settings, cookie data, time zone setting and location, operating system and platform and other technology on the devices you use to access our services.
- Marketing and communications data such as preferences in receiving marketing communications and your communications preferences
- Customer pupil data obtained from schools and organisations supporting schools (such as local authorities, multi academy trusts and other education providers) such as data on current staff and pupils including details of pupils on roll, absence information, pupil estimates and targets, teacher assessments, test assessment results, reading learning and assessment data, allocation to classes, pupil groups and teaching groups. Further information on processing of customer data can be found [here](#).
- Transaction data such as details of services you have purchased from us, purchase order details and payments made to/from us.
- Digital data such as audio recordings of calls and webchat data to our support lines, video/audio recordings of web-conference meetings and webinars, interaction on social media with us and our services.

Special categories of Personal data

Special category data is personal data which the UK GDPR says is more sensitive and gives them extra protection. Special category personal data includes details about racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life, sexual orientation, trade union membership, health, genetic and biometric data.

The Government and Customer data we process includes Special Categories of personal data. This data (including language, ethnicity and information about special educational needs) is used to help customers to ensure that all of their pupils are given equality of opportunity and treatment. The legal basis of processing is covered by the Data Protection Act 2018, Schedule 1, part 2, paragraph 8 (Substantial Public Interest Conditions – equality of opportunity or treatment).

How we collect information about you

We may collect your personal data from different sources, including:

- Directly from you such as when you enter details into our services or when you contact us for support through email, live chat or telephone. Data collected would include identity data, contact data and profile data.

- From your employer such as information provided by FFT customers about their users of FFT services. Data collected would include identity data, contact data and profile data.
- Customer data such as data provided by FFT customers for processing and use within their products and services, subject to the terms and conditions between the customer and FFT.
- Automated technologies such as when you interact with our services. Data collected would be technical data. Please see the section on Cookies and other technical data gathering techniques for more information on this type of data.

Use cases for data – type and lawful basis

The table below shows more information on the ways we plan to use your personal data and the legal bases we rely on. Where appropriate we have identified what our legitimate interests are.

Purpose/activity	Type(s) of data	Lawful basis for processing
To allow schools and organisations that support schools to analyse pupil data and related analyses via our services	<ul style="list-style-type: none"> • Customer 	<ul style="list-style-type: none"> • Necessary for our customers' legitimate interests (analysis of pupil performance, school performance, staff performance and ensuring equality of opportunity and treatment of pupils) • Necessary for our legitimate interests (provision of our core services to customers)
To allow schools and organisations to use our reading and literacy programmes	<ul style="list-style-type: none"> • Customer 	<ul style="list-style-type: none"> • Necessary for our customers' legitimate interests (improving literacy and reading in schools) • Necessary for our legitimate interests (provision of our core services to customers)
To produce research outputs including research papers and educational blogs	<ul style="list-style-type: none"> • Customer 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (marketing, provision and improvement of our core services to customers)
To register you as a user of our services	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical • Digital 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (provision of our core services to your school/employer)
To process and deliver invoices to customers and to evidence use by customers	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical • Transaction • Digital 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to administer and recover amounts owing to us, to defend or pursue legal claims in respect of usage of our services)
To evidence use by customers	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to defend or pursue legal claims in respect of the usage of our services, to maintain evidence in respect of pupil safeguarding requirements)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing & Communications • Digital 	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers and users use our products/services)

To provide helpdesk, support and maintenance services to users of our services	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical • Digital 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (provision of our core services to your school/employer)
To make suggestions and recommendations to you about products or services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing & Communications • Digital 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to develop our products/services and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical • Digital 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical • Digital 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) • Necessary for our legitimate interests (to promote our services and grow our business)
To record what training courses you have attended and offer other related services	<ul style="list-style-type: none"> • Identity • Contact • Profile • Digital 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to promote our services and grow our business) • Necessary for our customers' legitimate interests (to ensure staff are suitably trained)
To undertake research into how education systems function	<ul style="list-style-type: none"> • Government • Customer • Contact • Profile 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to be able to undertake research for public benefit)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

- **Promotional offers from us.** We may use your Identity, Contact, Marketing and Communications, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us if you have requested information from us, are a customer or user of our

services, or we have obtained your business contact details as a prospective customer from elsewhere (including your employer's website or a directory) and, in each case, you have not opted out of receiving that marketing.

- **Opting out.** You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Cookies and other technical data gathering techniques

- Cookies

Our services use cookies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. These cookies allow us to distinguish you from other users of our website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

For more information on our use of cookies, see our [Cookies policy](#) on our website.

- Analytics

When you use our services, we may use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. The information collected is classed as personal data because Google assigns a unique identifier to each visitor. We do not allow Google to make, any attempt to find out the identities of those visiting our website.

- Pixel Tags/Web beacons

A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behaviour, prevent fraudulent activity and improve security or that allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (see Analytics above);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party websites.

Sharing data with 3rd parties

We will not sell, exchange or otherwise distribute your personal data to unaffiliated third parties without your consent, except to the extent required by applicable laws and regulations, or as set out in this privacy notice.

We may share data we collect with any related company (or other incorporated or unincorporated entity) within our corporate group and with selected third parties including:

- our UK partners (including local authorities, academy trusts and dioceses), where we enter into agreements to support the provision of services to schools;
- Other business partners, in order to provide our services (for example where we enter into agreements with third parties who provide services to us or on our behalf); and
- analytics and search engine providers that assist us in the improvement of our website and the services we provide.

We may also disclose data we collect to third parties:

- if we undergo a change of control or any of our business or assets are sold or transferred (in which case we may disclose your data to the prospective seller or buyer);
- if we or substantially all of our assets are acquired by a third party, in which case information held by us about our website users will be one of the transferred assets; or
- if we are under a duty to disclose or share your information in order to comply with any legal obligation or legal process (for example, a court order), or in order to enforce or apply our contractual rights or any other agreement; in order to protect the rights, property, or safety of our website users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Overseas transfers

We do not transfer, or allow the transfer by our external processors of, pupil data outside of the UK.

Some of our external third parties (for example, the provider of our customer management system) are based outside the European Economic Area (EEA) so their processing of your personal data (other than pupil data) may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us if transferring your personal data out of the EEA.

Data Security

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data collected and processed by us, including encryption.

Additionally, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting data to us via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

If we give you a password upon registration for one of our sites or products, you must keep it confidential. Please do not share it.

Retention of data

We will retain and process your data for as long as we require it for the purposes for which it was collected or as is otherwise required by applicable law. To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of the personal data, the risk of potential harm from its unauthorised use or disclosure, the purposes for which we process it, whether we can achieve our purposes through other means, and the applicable legal requirements.

In respect of Customer Data, including customer pupil data, we will delete this no later than 48 months after termination of the customer's subscription term.

In respect of FFT data, we will delete this:

- 7 years after termination or expiry of the relevant service/product subscription.
- 7 years after the subscribing organisation has deleted the relevant user from the service/product.

Once your personal data is no longer needed, we will securely delete or anonymise it. We may continue to use anonymised data, which cannot be associated with you, for research or statistical purposes.

[Links to other sites](#)

Where we provide links to websites, plug-ins and applications of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

[Your data protection rights](#)

In some circumstances you have rights in relation to the personal data we hold about you. Please contact us using the contact details above if you wish to exercise any of these rights.

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to

provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

You will not usually have to pay a fee to exercise these rights but if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee (or refuse to comply with your request).

We may need specific information from you to help us confirm your identity; this helps keep your personal data safe and speeds up our response to your request. We try to respond to all legitimate requests within one month but this period may be longer if your request is particularly complex or you have made multiple requests; we will notify you in this case.

If we are only a data processor in respect of the data to which your request relates, we may not be able to comply with that request and will redirect you to the relevant data processor.

Duty to inform of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example if you are a user of one of our products or services and you change your email address.

Complaints to the Information Commissioner's Office

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance by email at dpo@fft.org.uk

Changes to the privacy notice

We keep this privacy notice under regular review. If we change our privacy notice, we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times.

Last updated: November 2022