



All Aboard Learning Ltd
267 Banbury Road
Oxford OX2 7HT, UK
support@allaboardlearning.com
Tel +44 1865 632965
Co Reg 06604357

All Aboard Data Privacy and Security Policy

29 June 2023

At All Aboard Learning Ltd, we value your privacy and understand the importance of keeping your personal information secure. We have this Privacy Policy to help you understand how we collect, store, use and remove the information that you provide us.

About All Aboard Learning Ltd Ltd's Privacy Policy

This webpage explains our privacy and security commitments in plain language.

- All Aboard Learning Ltd is a global provider of e-learning resources. We produce and/or distribute a range of printed resources, online resources and a network of websites including but not limited to those for the All Aboard Phonics, the All Aboard app, All Aboard Codebreaker, All Aboard Tutoring and the Easyread System.
- References to the Site in this Privacy Policy include all products and resources that we produce and /or distribute.
- All Aboard Learning Ltd is committed to protecting the safety and security of all our website visitors and our registered users, including students, teachers, school administrators and parents (collectively, **Registrants**) and we are sensitive to our Registrant's concerns about the safety of the personal information provided to us. Please read this Privacy Policy carefully in order to understand how any personal information collected by us is used.
- As a global company, our Privacy Policy has been developed in accordance with a range of legislation which applies to us.
- Collectively, this legislation includes, but is not limited to:
 - The Australian Privacy Act 1988
 - The New Zealand Privacy Act 1993
 - The United Kingdom Data Protection Act 2018
 - The United States Children's Online Privacy Protection Act ("COPPA") and Rule as administered by the Federal Trade Commission
 - The United States Family Educational Rights and Privacy Act ("FERPA")
 - The Alberta Freedom of Information and Protection of Privacy Act
 - The Canadian Personal Information Protection and Electronic Documents Act ("PIPEDA")
 - The Freedom of Information and Protection of Privacy Act (British Columbia) ("FIPPA")
 - The Personal Information International Disclosure Protection Act (Nova

- Scotia) (“PIIDPA”)
- The Municipal Freedom of Information and Protection of Privacy Act, Ontario (“MFIPPA”)
- The Student Online Personal Information Protection Act, California (“SOPIPA”)
- The EU General Data Protection Regulation (Regulation 2016/679)(“GDPR”)
- The UK General Data Protection Regulation (“UK GDPR”)
- The South African Protection of Personal Information Act (‘POPI Act’).

What personal information we collect

- We collect personal information to provide Registrants our learning products, services and related information. The kinds of personal information we collect depends on how you interact with us.
- We collect the following categories of personal information:
 - As a customer, prospective customer, or user of our Site, we may collect information such as your name, contact information including phone number and email address, school name, class year and country or state of residence or school.
 - We may also collect details of other interactions that you have with us, together with any other information that you choose to provide us with, for example, through your interactions with our customer and technical support teams.
 - We do not however collect any unnecessary personal information from Registrants.
 - It is impractical in most circumstances for you to remain anonymous, and we may not be able to interact with you, provide access to the Site, or answer your enquiry if we are not able to identify you or collect your personal information.
 - In the case of school/educational institution customers (**School Customer**), we seek consent from the School Customer to be provided with Registrant information for and on behalf of that student or teacher.
 - In the case of individual / home subscriptions (**Home Customers**) we seek consent from the Home Customer at the time of purchasing and registering the product to use the information collected. Subscriptions on behalf of a student who is a minor must be completed by the student’s parent or legal guardian.
- Registrants who do not give this consent (or do not have this consent provided on their behalf) cannot provide us with their personal information and cannot use the Site. You can however withdraw your consent at any time.

How we collect and process your Personal Information

- We may collect your personal information in a number of ways, including:
 - directly from you (unless it is unreasonable or impracticable to do so);
 - from our School Customer (e.g. teachers or school administrators that purchase access to our Site for their students and teachers); or
 - from third parties such as our distributors (resellers or sales agents).
- Students registering individually and not part of a school, must give their consent at the time of registration to provide us with their personal information such as their name, age and email address (or if they are under 13 years of age, or legally a minor in their relevant location, a parent or guardian must consent on their behalf and provide the

student's personal information). Alternatively, parents registering on behalf of their child(ren), must give their consent at the time of registration to provide us with information about them and their child(ren).

- Teachers or administrators registering for their class or school must give their consent at the time of registration to provide us with their own name, class name, school name and their email address, as well as the names of their students.
- We also ask for Registrants' consent to use any personal information collected in accordance with this Privacy Policy at the time of login to our Site. If a Registrant does not wish to provide us with their consent, they cannot agree to the Site Terms and Conditions and must not use the Site.

What we will do with your information

- The information collected from Registrants, customers or prospective customers may be used for the following purposes:
 - to provide access to our products and services;
 - to manage prospective purchases, purchased subscriptions and payments including to provide quotes or offers ;
 - to send a confirmation notice to the Registrant of the registration; to administer and manage accounts, including password resetting, responding to questions raised by Registrants, to contact the Registrant about any problems with the Registrant's account or conduct on the Site;
 - to receive updates about our products and services;
 - to send out an All Aboard Learning Ltd newsletter or emails about the Site including information about current events, changes, improvements, upgrades, new product development and rules of the Site;
 - to publish the names of winners and high performers on the Site or in the All Aboard Learning Ltd newsletter and to provide results data for each Registrant or school class;
 - to send prizes or certificates for participation and performance on the Site;
 - for administrative, planning, product or service development, staff training, quality control and research purposes relating to our products and services;
 - for marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so. Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send.
- All Aboard Heroes leaderboards: All Aboard Learning Ltd strives to provide a highly engaging Site for students. Given students have indicated their strong preference for their name to be shown publicly on our Sites in recognition of their achievements, we allow this – but we do not allow full names (i.e. First Name and Surname) to be shown publicly. In addition, all administrative user access to any Site permits the partial (to initials only) or full anonymising (by use of a pseudonym) of names, where preferred by the user. If you have any questions about All Aboard Heroes and managing the information that is disclosed, please contact us.
- The Site does not provide students with any means to communicate directly with each other. There are no chat rooms connected with the learning resources. Access to, and use of customer feedback forums are designed for use by parents, teachers and other

contributors who are not legally minors.

- The Site may have additional features in which parents and teachers can give their consent, and/or give consent on behalf of a student, to access, disclose or use their personal information or learning activity information.

What we will not do with your personal information

- All Aboard Learning Ltd will keep your personal information confidential and will not sell or disclose your information to advertisers or any external third parties, unless:

- we believe, in good faith, that we are required to share your information with a third party such as a regulator or court in order to comply with law, regulation, legal process, court order or subpoena;
- to enforce our Terms & Conditions or the terms of the licence granted to access and use the Site;
- the disclosure is to a third party that acts on our behalf, powers certain aspects of our Sites or processes data on our behalf, such as a distributor of our products and services, the licensor or owner of a product or resource that we distribute, or to a contracted service provider;
- in connection with any transaction involving our companies or assets, where another party acquires ownership or operation of the Site, in which case that successor organization will be subject to the obligations in this Privacy Policy and any contractual representations we have entered into; or
- to protect the safety and security of our Registrants and our Site.

- If third parties act on our behalf, we require them to hold, use and disclose your personal information in accordance with this Privacy Policy, applicable privacy obligations and our contractual obligations.

- Generally we will only use your information within All Aboard Learning Ltd, however, sometimes we provide data on results to government education departments, peak bodies managing or representing schools, or schools themselves, especially in the case of School Customers, who use the features of our products (such as performance reporting tools) for educational / teaching purposes. We will require these third parties to comply strictly with our instructions, use the information only for legitimate educational interests and not for any commercial purposes.

- We do not sell data to advertisers (whether personal, anonymous or aggregated). We do not use data to engage in targeted advertising to children and we do not create or build personal profiles of students other than for the purpose of supporting authorized educational/school purposes or as otherwise specifically authorized by a parent/student or school/educational institution customer.

- We do not use cookies or third party providers to engage in behavioural targeting of advertisements to students. For more information refer to our Cookies & Third Party Technologies Policy.

How long we hold your information

- We retain the personal information that we collect from and about our Registrants for as long as it is needed to provide access to the Site or to manage that Registrant’s account. Often it can be uncertain if a learner has finally completed an education process, so we do not routinely delete data on cancellation of a subscription.

- We take reasonable steps to delete the personal information we collect if your registration to use our Site lapses and you (or if you are under 13 or legally a minor in your relevant location, a parent or guardian may request on your behalf) opt out of receiving further communications from us, or if you ask us to delete your information. We may however retain and use personal information as necessary to comply with our legal and regulatory obligations, to resolve disputes and to enforce our agreements, and we may retain and use anonymous and aggregated information for performance reporting, benchmarking and analytic purposes and for product and service improvement.

- Registrants can request that their personal information be deleted by contacting the All Aboard Learning Ltd Data Protection and Privacy Officers via: support@allaboardlearning.com.

Updating and accessing your personal information

- Registrants have a right to request a copy of the personal information we hold about them, and Registrants can also update their personal information at any time, in each case by contacting All Aboard Learning Ltd.

- If you wish to receive a copy of this information or to update or correct information held about you, please address your request to the Privacy and Data Protection Officers. We will endeavour to deal with your request promptly.

Keeping your personal information secure

- All Aboard Learning Ltd is committed to information security. We will use all reasonable endeavours to keep the personal information we collect and use in a secure environment, and we have implemented appropriate technical, administrative and physical security measures that are designed to protect personal information from unauthorised access, disclosure, use and modification. These measures include the encryption of personal information and the implementation of organisational measures, such as our incident response plan. As part of our privacy compliance processes we review these security procedures to consider appropriate new technology and methods and engage independent third parties to review and audit aspects of our information security.

- We use Google Cloud Services (GCP) and Amazon Web Services (AWS) for data hosting and storage as set out in the table below. Both providers are recognised for their leading approaches to data security.

	Where data is hosted:		(Back up)
Easyread System	AWS	Ireland	UK
All Aboard Phonics/All Aboard	GCP	US	UK

All Aboard Codebreaker	WebinarGeek	Holland	UK
All Aboard Tutors	GCP	US	UK

- Further information regarding Google Cloud Services privacy and security practices, including the latest updates and compliance information, can be found at <https://cloud.google.com/terms/cloud-privacy-notice> and <https://cloud.google.com/security> • Further information regarding WebinarGeek privacy and security practices, including the latest updates and compliance information, can be found at <https://www.webinargeek.com/privacy> and <https://www.webinargeek.com/security-and-availability>
- Further information regarding Amazon Web Services privacy and security practices, including the latest updates and compliance information, can be found at aws.amazon.com/compliance/data-privacy-faq and aws.amazon.com/security
- We provide our personnel with training about data security and privacy, and we require all our employees and contractors to comply with this Privacy Policy and their obligations of confidentiality. We will take appropriate actions to address breaches by employees and contractors of the obligations imposed by this Privacy Policy.

Data transfers, storage and processing globally

- Registrants' personal information is uploaded to and stored on servers that are maintained by third party providers at locations in the United States and Europe.
- As we operate globally, we may on occasion allow your personal information to be accessed in countries other than your own location. We may do this where data is accessed:
 - by our sales, operational or global customer support teams (primarily, although not exclusively, located in Australia, the United Kingdom, the USA and Canada); or
 - by one of our licensors (who owns, develops and hosts a particular product) or distributors (sales agents or resellers) who requires the information to set up, service or manage a customer account;
 - where a copy is sent to the Registrant itself at their request.
- By consenting to the collection and use of their personal information, Registrants' consent to their personal information being transferred and stored in this manner.
- Registrants in Canada, please refer to 'Special information for users across Canada'.
- Registrants in the EU and UK, please refer to 'Special information for users in the European Union and the United Kingdom'.
- We may record, with your express consent, calls with customers for quality and staff training purposes. If, with your consent, we record a telephone call for this purpose, that recording will be stored in data centres located in the US and deleted when no longer required.

Anonymous or aggregated information

- In addition to personal information and results data, All Aboard Learning Ltd also collects

anonymous information about Registrants and the activities of Registrants on the Site. Anonymous information is information that is not linked to the name or identity of a user. This information is used for educational performance reporting and analytics and to assist us in enhancing the learning resources. The information remains anonymous at all times.

- All Aboard Learning Ltd utilises third-party providers to power certain elements of the Company's online marketing and advertising. These service providers collect data about your activities that does not personally or directly identify you when you visit our website or the websites and online services where we display advertisements (i.e. publishers). This information may include the content you view, the date and time that you view this content, the products you purchase, or your location information associated with your IP address. We use the information we and these third party service providers collect to serve you more relevant advertisements regarding All Aboard Learning Ltd resources (referred to as "retargeting"). We collect information about where you saw the ads and what ads you clicked on. This is data that does not personally or directly identify you. We do not engage in this type of marketing or advertising to students or children.
- When agreeing to the Term and Conditions, Registrants grant us the right to use this anonymous information for our own purposes, such as the preparation of statistical reports or to improve and change the content of our products.
- You can find more information on cookies in our 'Cookies & Third Party Technologies Policy'.

Revision of Privacy Policy

All Aboard Learning Ltd reserves the right to change, modify, or revise this Privacy Policy in order to comply with any applicable laws, to reflect changes in our processes or for any other reason at any time. Material changes in our Privacy Policy will be communicated to Registered Users and customers, but we also encourage our Registrants to check the Privacy Policy periodically to read about any changes, modifications, or revisions. Registrants may wish to check it each time they submit personal information. You will be deemed to have consented to such variation by your continued use of the Site following any changes being made.

How to Contact Us

All requests to access, update and delete personal information as well as questions and concerns about your personal information and this Privacy Policy should be directed to our support team at support@allboardlearning.com

If you have a question or a complaint you can also write to us at:
All Aboard Learning Ltd, 267 Banbury Road, Oxford OX2 7HT, UK

We will endeavour to respond to your query as quickly as possible. If you are not satisfied with the response you receive, you may have the right to contact the regulator responsible for privacy in your home country.

You can contact us by phone (+44 1865 632965) or by email (support@allboardlearning.com).

Special Information for users in the European Union and the United Kingdom

- All Aboard Learning Ltd welcomes the EU GDPR and UK GDPR as essential regulations to affirm our commitment to data protection across the European Union and

the United Kingdom. We are committed to ensuring:

- Personal data is processed fairly, lawfully and in a transparent manner
- Personal data is collected and processed only for specified and lawful purposes
- Processed data is adequate, relevant and not excessive
- Processed data is accurate and, where necessary, kept up to date
- Personal data is not kept longer than necessary
- Personal data is processed in accordance with an individual's rights
- Personal data is kept secure
- Personal data is not transferred to countries outside of the EU or the UK without adequate protection

• All Aboard Learning Ltd is registered with the Independent Commissioners Office (ICO) in the UK, with registration reference ZA090616.

Cookies & Third Party Technology Policy

We use cookies in the operation of our website and educational resources.

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. The cookie then allows the website to recognise your browser during the visit and potentially if you later return to the website. This allows the website to know facts like whether you have logged in, certain preferences you have set and what you have already visited or seen on the website. So they are essential to the operating of the site.

They have three types:

• **Session cookies:** specific to a particular visit and limited to sending session identifiers (random numbers generated by the server) so you don't have to re-enter information when you navigate to a new page or check out. Session cookies are not permanently stored on your device and are deleted when the browser closes;

• **Persistent cookies:** record information about your preferences and are stored in your browser cache or mobile device; and

• **Third party cookies:** placed by someone other than us which may gather data across multiple websites or sessions.

We **do not** use cookies or third party providers to engage in behavioural targeting of advertisements to students. We do use the following cookies

• **Essential website cookies.** These are cookies that are required for the operation of our Website, Services and the use of their features. The information collected relates to the operation of our Website and Services (e.g. website scripting language and security tokens) and enables us to provide you with the service you have requested. In most cases these are session cookies and are deleted when you close your browser. Some may persist for up to 48 hrs to improve the experience for users that log back into the Services within a short period of logging out.

• **Analytical / performance cookies.** These cookies collect information on how users use our Website, for example which pages you visit most often, whether you receive any

error messages and how you arrived at our website. Information collected by these cookies is used to improve your use of our Website and Services. These cookies expire after a period of inactivity.

- **Functionality cookies.** These cookies are used to enhance the functionality of our Websites and Services, to improve your user experience and to make your visits more tailored and enjoyable, by remembering the choices you have made when interacting with our websites and online products. In most cases these cookies are persistent cookies and remain stored, in order to recall your preferences, until you clear your cache.

- **Advertising cookies.** These cookies are used to make advertising messages more relevant to the user of the Website and are based on the user's browser settings. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting ads that are based on your interests. In most cases these cookies expire within 90 days. We do not use cookies to engage in behavioural targeting of advertisements to students.

Additional information about third party cookies

Some of the third party cookies we use on our Website include:

- Cookies to monitor web traffic and analysis services. We use Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. All the information these cookies collect is aggregated and therefore anonymous. You can find more information about Google Analytics at the following links: [Marketing Platform Google](#) and [Safeguarding your data](#).

- Cookies that allow the provision of enhanced functionality and personalisation, such as videos.

- Cookies used for advertising and marketing purposes to promote our Services, including but not limited to Google AdWords, LinkedIn and Facebook.

How can I manage cookies?

You will be asked to manage your cookies when first coming to any of our sites. If you want to change your cookie settings for the site, the easiest way to do that is to delete all your cookies via your browser settings and then change your choices when you return to the site.