



All Aboard Learning Ltd Privacy Notice

Your privacy matters to us

We are All Aboard Learning Ltd, a global provider of e-learning resources for primary school age children. 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 Reading Intervention Systems, All Aboard Tutoring, Reading Copilot and the Easyread System.

All Aboard Learning Ltd is a private limited company registered in England & Wales (06604357). Our registered address is 267 Banbury Road, Oxford, England, OX2 7HT and we are registered with the [UK Information Commissioner](#) under registration number ZA090616.

We are the data controller for the personal data we process about service enquirers, customer contacts, subscribers, training course delegates, customer leads, job applicants, employees, contractors, website users, parents who subscribe to our products directly and children who take part in our literacy research programme.

We sometimes process personal data as a 'data processor'. This is when handle personal data on behalf of schools. In these cases, we process this information upon the schools' written instructions under a contract (a Data Processing Agreement). Any collection or use of that information is limited to the purpose of providing the service to our school customers. Our various policy documents can be found here: <https://allboardlearning.com/info/policy-documents/>

Our privacy promise to you

Transparency

We are committed to protecting and respecting your privacy. We will always tell you what data we're collecting about you and how we use it and will never ask for more information than we need to. We will not share your data with any third parties unless you have consented to this; they are a trusted partner working on our behalf; or the law requires us to, and we will never sell your personal data.

Security

We are committed to following industry best practices to ensure your data is stored safely and securely. We will protect the information we process about you from accidental or unlawful access, disclosure, loss, damage or destruction.

Control

We will always give you control over the communications you receive from us and you can stop or tell us you no longer wish to receive these at any time by emailing support@allboardlearning.com

How we get your information

Most of the personal data we process is provided to us directly by you, for example when you:

- make an enquiry by email, phone or through our website
- sign up to our newsletters, blogs and promotions
- work with us as an employee or contractor
- use our website
- take part in our literacy research programme

We may also collect personal information about you indirectly, for example through:

- our customers
- public sources (e.g. websites and professional networking sites)
- recruitment agencies
- referees to support your job application (at your request)

How we handle personal data

Children's data

We collect the name, date of birth, dialect and gender of the children/learners that use our products. This information is provided to us directly by the child's parent or their school. **We do not allow children under 13 years old to set up an account to use any of our products or services. This can only be set up by the child's parent or their school.**

We need this information for our 'legitimate interests' i.e. to ensure the child/learner receives the learning materials relevant for their age and dialect, and to ensure they are referred to by the correct name and gender when parents and schools interact with us.

We also process information about how they are using our products (product usage and session data) and how well they are doing (assessment data). We need this information so we can fulfil our 'contract' with the parent or school by enabling the parent, learner or school to keep track of their progress.

When working directly with parents, where a child has not progressed through our materials at the expected rate, we may suggest personalised support and collect additional information about their learning needs. Where this is the case, we will ask for the parent's 'consent' prior to any personalised support being delivered.

We keep all information in relation to users of our service for 5 years after their use of the service has ended. This allows us to satisfy any contractual, legal, accounting, or reporting obligations.

Parents and Carers

When a parent or carer registers an account with us through our website to purchase one of our products or services, we collect their name, telephone number, address, payment details and a description of the product or service they have purchased. We need this information so we can fulfil our 'contract' with them or take steps at the request of the customer prior to entering into a contract with them. We keep this information for 5 years after the subscription has ended to satisfy any contractual, legal, accounting, or reporting obligations.

Schools

We collect the name and contact details of our school customer contacts (employees) and information about the service the school has requested. We need this information so we can fulfil our 'contract' with the school or take steps at the request of the school prior to entering into a contract with them. We keep this information for 5 years after their use of the service has ended to satisfy any contractual, legal, accounting, or reporting obligations.

Literacy Research

It is important to us that we use evidence-based research to improve our service. We do this in pursuit of our legitimate business interest to help as many people as possible learn to read. Our research includes learning from the personalised support we give, as well as understanding the broader use and success of our services. Where our personalised support has contributed to a learner reaching their learning aims, we will anonymise the personal data and use the successful method to help others who may also be struggling to progress in their learning.

We also use aggregate data to identify trends and patterns to help us improve our services, contributing to our aim of helping everyone learn to read. Some examples of the types of information we collect includes whether a learner revisits a lesson, how frequently they use our service and which of our services are the most successful in helping them reach their learning aims. This information is used on an anonymous basis to improve our services.

Service enquirers

When someone contacts us asking about our services through our website, by email or over the telephone, we collect their name, contact details and the nature of their enquiry. We collect this information for our 'legitimate interests' as a company to be able to respond to their enquiry and keep a record of our communications with them. If they choose to become a customer, we will keep their personal data in line the relevant customer retention periods given under each section of this privacy notice. If they do not become a customer, we keep this information for 5 years from the date of the last communication.

Subscribers

We collect the name and contact details of people who want to subscribe to our newsletters, resources, blogs and promotions. We collect this information with the 'consent' of the individual when they opt-in to receive these communications. If a person unsubscribes, we remove them from our mailing list but retain their contact details in a separate database. We need to retain this information for our 'legitimate interests' to ensure we do not contact them again in the future. We keep subscriber data until they unsubscribe, if the email address becomes invalid or if we believe they no longer want to receive communications from us.

Training delegates

We collect the name and contact details of individuals who enquire about or book onto our training sessions. We process this information in order to deliver the training sessions and to pursue our 'legitimate interests', i.e. to let them know about future training events which we believe they may be interested in attending. Delegates can opt-out from receiving communications about future training events at any time by emailing support@allaboardlearning.com We keep delegate contact details for as long as we believe they may be interested in receiving communications about our training events, or until they unsubscribe.

Customer leads

We sometimes collect the name, job role and work contact details of employees working for potential customers, who we think would be interested in receiving information about our company's services; this is known as 'B2B' or 'business to business' marketing. This information is only collected from public sources, such as company websites or where the employee has published their name, work profile and contact details on a networking site for professionals, (such as LinkedIn) and therefore would have a reasonable expectation that companies like us, may contact them to make introductions and market their services.

We collect this information to pursue our 'legitimate interests' to be able to promote and market our services to potential new customers. Recipients can opt-out from receiving communications from us at any time, by emailing support@allaboardlearning.com.

We keep this information for 5 years from the date of our last communication, where the communication does not lead to a sale. If the communication does lead to a sale, this information will be retained for 5 years.

Website users

When you visit our website, Cookies are used to help you navigate around our site and tell us how well our website is performing. If you have arrived on our site by clicking on an advertisement via Google or Meta, we collect this information to monitor the success of our marketing strategy.

We do not make any attempt to find out the identities of those visiting this website and will not associate any data gathered with any personally identifying information from any source. We collect this information for our 'legitimate interests' to help you use our website and keep us informed about our website's performance.

Free Trials

We offer free trials to allow users to understand our materials prior to commitment. Uses of personal data of participants of our free trials is the same as our paying customers and the explanations provided in the above sections will still apply.

Job applicants

We receive Curriculum Vitae (CVs) and application forms from people who apply for jobs with us. This will often include the individual's name, contact details, experience, education and a personal statement to support their application. We collect this information with the person's 'consent', and ongoing processing for our 'legitimate interests' to be able to assess the suitability of the individual and where relevant, invite them to interview.

Applicants who are not successful, prior to or after interview, their CV and application will be destroyed after 3 months, unless the applicant gives us their permission to retain this information for longer. Information relating to successful applicants, will be retained on their employee file and held for the duration of their employment, plus a further 7 years after their contract has ended.

Employees

We collect information about our employees, such as their name, date of birth, contact details, recruitment information, evidence of their right to work, outcome of their criminal record check (DBS) (where required), references, contract, bank details and other employment information. We collect this information to enable us to 'fulfil our contract' with the employee or to 'take steps at the request of the employee prior to entering into a contract' with them. For example, to ensure they are paid; make pension and tax contributions on their behalf and provide employee services and benefits to them. We also collect this information to pursue our 'legitimate interests', for example to recruit employees, maintain a register of our employees (past and present) for insurance, legal, tax and pension purposes and to assist in the prevention or detection of crime (including fraud).

We sometimes collect 'special category data' about our employees, for example information about their disabilities, health and dietary needs or religious beliefs. We process this information to fulfil our contract with the employee (or in order to take steps at the request of the data subject prior to entering into a contract with them) and to carry out our obligations or exercise our or our employees' rights in relation to employment, social security or social protection. We keep employee files for 7 years] after the contract has ended.

Contractors

We collect information about our contractors, such as their name, contact details, experience, outcome of their criminal record check (DBS) (where required), service contract and bank details. We collect this information for our 'legitimate interests' to be able to assess the suitability of the individual and to enable us to 'fulfil our contract' with them or to 'take steps at their request prior to entering into a contract' with them. We keep contractor files for 7 years after their contract has ended.

Who we share information with

We do not share your personal data with other organisations, unless it is necessary for our 'legitimate interests', legal, contractual, regulatory or law enforcement purposes. Where we use 'data processors' to help us manage and store our data (cloud storage providers); promote our services (advertising/marketing companies) or help us deliver our services (contractors or specialist companies), we have Data Processing Agreements in place, to protect any personal data they may have access to on our behalf.

Our data processors only act on our instructions and are carefully selected to ensure they have robust security measures in place and comply with data protection legislation when processing personal data.

Where we process your personal data as a data ‘processor’ for our customers, your personal data may be accessible to or shared with that customer, to enable us to ‘fulfil our contract’ with them.

There may be times when we need to disclose personal data to other data controllers, for example:

- In the event that we sell our company or its assets
- If you provide us with your consent
- If we are under a duty to disclose your personal data, for example in response to a court order, request from law enforcement agencies or to report safeguarding concerns.
- To enforce or apply our terms and conditions and other agreements.
- To protect the rights, property, or safety of our company and its employees, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

We do not license, rent or sell any personal data about minors or adults.

Where we store your data

We use Google Cloud, Microsoft Azure and Amazon Web Services’ secure platforms to store our data and our customers’ data. The data location and security measures of each of our storage providers are below.

Product or Service	Data Storage Location	Security Measures
All Aboard Phonics	Google Cloud Iowa (us-central1)	Google Cloud’s security measures
All Aboard app	Google Cloud Iowa (us-central1)	Google Cloud’s security measures
All Aboard Reading Intervention Systems	Microsoft Azure Dublin, Ireland	Microsoft Azure’s security measures
All Aboard Tutoring	Microsoft Azure Dublin, Ireland	Microsoft Azure’s security measures
Easyread	Amazon Web Services Dublin, Ireland	Amazon Web Services’ security measures
Reading Copilot	MongoDB Dublin, Ireland	MongoDBs security measures

We have Data Processing Addendums with our storage providers to ensure personal data is handled in accordance with UK and EU data protection laws. The Addendums are available for inspection as follows:

[Google Cloud Data Processing Addendum](#)

[Microsoft Azure Data Processing Addendum](#)

[Amazon Web Services Data Processing Addendum](#)

[MongoDB Data Processing Agreement](#)

International data transfers

Data stored in All Aboard Phonics and All Aboard app are stored securely in Google Cloud in the US. Google Cloud's [Data Processing Addendum](#) incorporates the European Commission's [Standard Contractual Clauses \(SCCs\)](#). For our UK customers, this also includes the UK [International Data Transfer Addendum](#) to the European Commission's SCCs.

How we protect your data

We take our security responsibilities very seriously and have put in place robust measures to protect our data and our customers' personal data from accidental or unlawful access, disclosure, loss, damage or destruction.

Here are some examples of how we achieve this:

- Data is held on encrypted servers.
- Personal data is encrypted in transit and at rest (with the exception of our EasyRead product; the data in this platform is held securely but not encrypted at rest).
- Access to our data and systems is on a strict need to know basis and we ensure our employees and contractors are under an obligation of confidentiality.
- Employees receive mandatory data protection training and sign up to our Data Protection Policy.
- We have robust procedures in place to manage and report personal data security breaches, in the unlikely event of a breach occurring.
- Where we use companies who process personal data on our behalf, we carry out due diligence checks on these companies and have written contracts in place which require them to handle personal data in line with data protection laws.
- We use up to date virus and malware protection software and we back up data regularly.

Your data protection rights

You have the following rights under the UK data protection laws:

Right to know

You have the right to be told how your personal data is being processed. This privacy notice tells you how we handle your personal data.

Right of access

You have the right to ask us for a copy of your personal data.

Right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Right to erasure

You have the right to ask us to erase your personal data in certain circumstances.

Right to restriction of processing

You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Right to object to processing

You have the right to object to us processing your personal data where we consider this is necessary for us to perform a task in the public interest. You can also object to us using your personal data for direct marketing purposes.

Right to data portability

You have the right to ask that your personal data is transferred (ported) from us to another organisation or given to you. This applies to information you have given to us where we are processing your information based on your consent or for contractual purposes and the processing is automated.

Right to complain

We work to high standards when it comes to processing your personal data. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office via their website at:

www.ico.org.uk/make-a-complaint

To exercise your data protection rights please contact us by emailing support@allaboardlearning.com. You are not usually required to pay a fee and can expect to receive a response within one calendar month. Further information about your data protection rights can be found on the Information Commissioner's Office website at www.ico.org.uk

International Customers

Our educational products and services are popular across the globe. If you are accessing our services outside the United Kingdom (UK), your country may have its own data protection laws. The UK data protection laws provide exceptional rights, control and protection for personal data. This privacy notice explains how we look after your data and the rights you have under the UK data protection laws, however if you have any queries about how we can meet your country's data protection laws, please get in touch by emailing us at support@allaboardlearning.com

Children’s Online Privacy Protection Act (COPPA) (for U.S customers)

COPPA is a U.S law that aims to protect the privacy and personally identifying information of children under the age of 13, who reside in the US and use online services. We care about protecting children’s information online and adhere to the COPPA principles. Here is a summary of how we achieve this:

1. Publish a clear and comprehensive privacy notice

This comprehensive privacy notice tells you how we handle personal data, including data about children who are under 13.

2. Give parents a direct notice before collecting information from children under 13.

We do not allow children under 13 years old to set up an account to use any of our products or services. This can only be done by the child’s parent or their school. This privacy notice is made available to parents and schools when they set up an account with us.

3. Obtain verifiable parental consent prior to collecting, using or disclosing personally identifiable information from children under 13.

Consent to collect this information is obtained directly from parents, or the schools on their behalf, when they set up an account. We do not use or share any children’s personal data without express permission from the parent or their school.

4. Provide a reasonable means for a parent to review the personally identifiable information collected from their child and for them to refuse to permit its further use.

Parents can exercise their right to see this information and can request that we stop processing their child’s information, by emailing us at support@allaboardlearning.com

5. Establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of the personal information collected from children under 13.

Children’s data is held securely in encrypted servers. For more information, please see the ‘How we protect your data’ section of this privacy notice.

6. Retain personal information collected online from a child for only as long as is necessary to fulfil the purpose for which it was collected.

We only keep this information for as long as we need to, to satisfy any contractual, legal, accounting, or reporting obligations.

We do not licence, rent or sell any personal data about minors or adults.

Contact us

If you have any queries about this privacy notice or the services we offer, please email our Data Protection Officer at datasecurity@allaboardlearning.com or write to us at FAO David Morgan, All Aboard Learning Ltd, 267 Banbury Road, Oxford, England, OX2 7HT.

Changes to this privacy notice

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated on 8th February 2024.