



## Data Protection Compliance Statement

We are All Aboard Learning Limited, a UK company registered in England and Wales (06604357). We are a global provider of educational e-learning resources intended for use by 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, All Aboard Reading Copilot and the Easyread System.

Our registered address is 267 Banbury Road, Oxford, England, OX2 7HQ.

We understand our moral and legal responsibilities to look after the personal data we hold in compliance with the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018.

This statement provides a summary of how we achieve compliance with the UK GDPR and protect personal data.

### Data Protection Registration

We hold a Data Protection [Registration](#) with the UK Information Commissioner's Office ZA090616.

### Privacy Notice

We publish a privacy notice which explains who we are and what we do with personal data, which is available on our website at <https://allaboardlearning.com/info/policy-documents/>.

### Data Protection Officer

Our organisation is not legally required to appoint a Data Protection Officer (DPO) however, we take our data protection responsibilities seriously and have chosen to make this appointment. Our Data Protection Officer is David Morgan who can be contacted at [datasecurity@allaboardlearning.com](mailto:datasecurity@allaboardlearning.com)

### Leadership and Oversight

Our senior management team actively promote and monitor our data protection compliance alongside our Data Protection Officer.

### Audits

We undertake data protection and security audits to ensure our policies, procedures, practices and systems remain compliant. These findings are documented, and we have a central action plan to implement any recommendations arising from the audits.

### Policies and Procedures

We have a comprehensive Data Protection Policy, Personal Data Breach Handling Procedure and Data Protection Request Handling Procedure. These are communicated to our employees during their on-boarding and when revisions are made. All employees (and where relevant contractors) must read and abide by our policies and procedures.

## **Training and Awareness**

Our employees receive mandatory data protection awareness training during their on-boarding and refresher training annually.

## Information Security

We have appropriate and proportionate security in place to protect personal data against unauthorised or accidental access, disclosure, loss, destruction or damage.

Here are some examples of the **technical** security measures we have in place to protect our network, equipment and the data they contain:

- We have up to date anti-virus and anti-malware software in place.
- We ensure security patches are applied promptly.
- We restrict access to systems on a 'need to know' basis.
- We segregate customer data.
- We enforce strong password policies.
- We use encrypted platforms to send, receive and store personal or confidential data securely. 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).
- We regularly back up our data.
- We use Multi-Factor Authentication to access our data securely.
- We test our company's disaster recovery and business continuity plans to ensure data can be restored in a timely manner in the unlikely event of an incident.

Here are some examples of the **organisational** security measures we have in place to protect personal data:

- Our recruitment procedures include Disclosure and Barring Service (DBS) vetting checks (Enhanced DBS for employees visiting schools) and confidentiality clauses are built into our employment contracts.
- Data protection and security awareness training is provided to employees during their on-boarding and annually thereafter.
- Policies and guidance are in place relating to the handling of personal data. These are communicated to employees and other individuals as necessary, including policy revisions.
- Data protection and security compliance is a regular agenda item in meetings.
- Appropriate security equipment, policies and guidance are provided to employees.
- Buildings and offices are secured when not in use.
- Paper documents and files containing personal data are stored securely and access restricted.
- Security procedures are in place for visitors coming into our offices.

## Personal Data Breaches

We have procedures to identify, report, record, investigate and manage personal data security breaches. All incidents and suspected personal data breaches are reported to our Data Protection Officer. If a security incident occurs which involves our customers' personal data, they will be notified without undue delay.

## Data Processing

We carry out due diligence checks with prospective data processors (i.e. suppliers of goods or services which involve the processing of personal data on our behalf), to assess they have appropriate technical and organisational measures that are sufficient to implement the requirements of the data protection legislation and to protect the rights of data subjects and our customers.

We have written contracts in place with our data processors (Data Processing Agreements) which contain data protection clauses. For more information about who our data processors are, please see our Privacy Notice [\[insert link to Privacy Notice\]](#).

Where we act as a data processor for our customers' personal data, our processing is covered by a Data Processing Agreement. This is available on our website at [www.allaboardlearning.com](http://www.allaboardlearning.com) and is incorporated within our Terms and Conditions [\[insert link to Tc's & C's\]](#).

## Data Storage

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 <a href="#">security measures</a>
All Aboard app	Google Cloud Iowa (us-central1)	Google Cloud's <a href="#">security measures</a>
All Aboard Reading Intervention Systems	Microsoft Azure Dublin, Ireland	Microsoft Azure's <a href="#">security measures</a>
All Aboard Tutoring	Microsoft Azure Dublin, Ireland	Microsoft Azure's <a href="#">security measures</a>
Easyread	Amazon Web Services Dublin, Ireland	Amazon Web Services' <a href="#">security measures</a>

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](#)

## 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.

## Data Subject's Rights

Employees are provided with training and guidance on how to recognise requests from data subjects exercising their data protection rights. We have a comprehensive Data Protection Request Handling Procedure and record and monitor all requests received. Where a request is received from one of our customers' data subjects, we ask them to make their request directly to our customer.

## 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 Data Protection Compliance Assurance Statement 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](mailto: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

Our 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. Our 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](mailto: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 license, rent or sell any personal data about minors or adults.**

**Contact Us**

If you have any queries regarding our data protection compliance, please contact our Data Protection Officer, David Morgan at [datasecurity@allboardlearning.com](mailto:datasecurity@allboardlearning.com)