



## Website Privacy Notice

### Introduction

Planpanion LTD is a UK company on the public register of data controllers, maintained by the Information Commissioner's Office; license number ZB203247.

We know you care about your privacy, and we take that seriously. This Privacy Notice describes our policies and procedures for collecting and using your personal data. It also sets out your rights relating to that data

We understand that data protection is an ongoing responsibility. We will update this notice from time to time in response to changes in the data protection legislation and/or our processing activities. We reserve the right to update this Privacy Notice at any time, and we will publish a new Privacy Notice when we make any substantial updates.

### Data Protection Officer

Planpanion LTD understands that schools have a legal obligation to undertake due diligence when engaging third-party service providers, and we are committed to ensuring we meet your expectations for data protection compliance. We have appointed a Data Protection Officer to assist us in meeting our obligations, and as a point of contact if you have any queries or concerns about our data protection policies or practices. Our data protection officer can be contacted by emailing [DPOService@schoolspeople.co.uk](mailto:DPOService@schoolspeople.co.uk)

### This notice applies when individuals and organisations:

- visit our website
- communicate with us by email, letter, phone, web form, or social media channels
- enquire about our services
- requested or access a free trial of services
- subscribed to our services
- use our services

### Planpanion as a Data Controller

We act as a Data Controller for all personal data collected or otherwise processed when an individual or a client organisation (School, Academy, or Trust)

- visits our website
- subscribes to our newsletter
- enquires about services
- accesses a free trial, or subscribes to services
- communicates with us, completes a voluntary survey, or otherwise provides feedback on our service provision

### Planpanion as a Data Processor

We act as the client's data processor when receiving and handling personal data related to the client's authorised primary and secondary users of our services.

The client organisation **must** meet their transparency obligations relating to the sharing of personal data in the relevant stakeholder privacy notices

Where pupil data is shared to facilitate use of the 'Review' assessment platform (available to 'Team Pass' subscribers only), the client must obtain the relevant parental consent before pupils are registered on the learning platform.

### **Pupil Registration and Pseudonymisation**

When registering pupil users on the learning platform there are various options to meet the client's policies on the sharing of children's data. The platform will accept:

- first name, last name
- first name, initial of last name
- pseudonymisation - use of an artificial identifier e.g. Pupil 1, Child A, etc.

### **How we collect personal data**

Most of the personal data we hold is provided to us directly by individuals who complete our various web forms to either communicate with us or trial/purchase our service. We ensure the personal data we collect are appropriate, necessary, and proportionate for the purposes for which it is collected.

Where a client organisation (School, Academy or Trust), has purchased a 'Team Pass', the client's administration team will provide personal data relating to Teachers (primary users), via the creation of user accounts. Or, they may provide the primary users' names and email addresses directly to us so that we can generate the user accounts on the client's behalf.

Primary users (Teachers) may provide pupil data to generate secondary user accounts ('Team Pass' users only), that permit their pupils to access our 'Review' assessment platform. Teachers have the option to limit pupil data or to pseudonymise pupils entirely (see [Pupil Registration and Pseudonymisation](#), above).

### **Personal Information Planpanion LTD Collects**

#### **[General Enquires/Contact Us](#)**

If you correspond with us by email, post, web form, social media or other mode of communication, we may retain the communication and the information contained within it to respond to your query, complaint, or similar concern.

<b>Personal data categories</b>	<b>Purpose</b>	<b>UK GDPR Lawful Basis</b>
Name, contact information, content of the communication	Customer service and support	Legitimate interest (Article 6(1)(f))

### Free Trial & Subscription Quotation

We need limited personal data to register you for a free trial of our learning resources

**Please note**, if you register for a Team Plus Trial the School/Trust is responsible for obtaining parental consent before pupils are registered on the Learning Platform

Personal data categories	Purpose	UK GDPR Lawful Basis
First name, family name, School/Trust name, address and email	Customer service and support	Legitimate interest (Article 6(1)(f))

### Payment & Purchase Information

You may choose to purchase services from Planpanion LTD using a payment card. Typically, payment card information is provided directly by users, via our website, into the PCI/DSS-compliant payment processing service to which Planpanion LTD subscribes. Planpanion LTD does not, itself, process or store payment card information. Payment may also be made via Invoice. The personal data we collect for each method of payment is detailed in the table below.

Personal data categories	Purpose	UK GDPR Lawful Basis
Individuals: First name, family name, residential address, email address, phone number School/Trust: name and address email and phone number. Account Password	Fulfilling client orders by payment card Finance and Audit	Contract ((Article 6(1)(b)) Legal Obligation (Article 6(1)(c))
Individual/School/Trust name & address School/Trust Finance contact name and email address Name and email address of each teacher user Name of Team manager/s (if relevant) Purchase order number	Fulfilling client orders by invoice Finance & Audit	Contract ((Article 6(1)(b)) Legal Obligation (Article 6(1)(c))

### User Account Set-up

User account data is provided by and processed on behalf of the client organisation. See "[Planpanion as a Data Processor](#)", above.

### Primary User Account Set-up

Personal data categories	Purpose	UK GDPR Lawful Basis
First name, last name Email Address Password	Access to service provision	Data Processing Agreement (Article 28(3))

### Secondary User Account Set-up

Personal data categories	Purpose	UK GDPR Lawful Basis
First name, last name/First name/ last name initial/other identifier Email Address, Password	Access to service provision	Data Processing Agreement (Article 28(3))

### Newsletter

Organisations and individuals may sign up to receive our newsletter by providing an email address. If subscribers change their mind an unsubscribe (opt-out) feature is available at the bottom of each newsletter. Alternatively, you may unsubscribe via the website by following this link [Newsletter – Planpanion](#)

Personal data categories	Purpose	UK GDPR Lawful Basis
Email Address	Newsletter subscription	Legitimate interest (Article 6(1)(f))

### Additional Data Collected via the Website

Our website uses cookies to allow it to function properly, collect useful information about its visitors and help improve your user experience. For more information on how we use cookies please see our **Cookie Notice**

We use a third-party service, Google Analytics, to collect standard internet log information and details of website visitor behaviour patterns. We use this information to improve the website experience and to collect aggregate data related to the number of visitors to our website. We do not make or allow Google to make any attempt to identify individuals visiting our website.

We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

Planpanion LTD has a legitimate interest in understanding how visitors, clients and potential clients use its website.

### [Cookies and web beacons](#)

Planpanion LTD makes available a Cookie Notice that describes the cookies used on its website and provides information on how users can accept or reject them.

### [Third-Party Links](#)

The website may include links to third-party websites including Facebook, Twitter, Instagram, Threads, and TikTok.

Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website via a link, we encourage you to read the privacy notice of every website you visit.

### **Data Storage and Retention**

All data is kept on encrypted servers or encrypted backup servers in the EU and UK.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, insurance or reporting requirements.

Planpanion LTD typically keeps personal data for up to 7 years from the end of our relationship with you. In some cases, such as if there is a dispute or legal action, we may be required to keep personal information for longer.

### **Who do we share personal data with?**

We do not share data with anyone without consent unless the law and our policies allow us to do so.

We may share limited personal data with suppliers and third-party service providers. These service providers include:

- Our Accountant: Ellipse Accountants & Business Advisers LTD
- AWS
- Mailgun
- The Schools People: DPO Services
- Sage

Service providers are contracted to apply the same level of protection for personal data as we do in accordance with the UK GDPR and the Data Protection Act 2018. We authorise service providers to use personal data only as necessary to perform services on our behalf, or to comply with legal obligations if necessary.

### **Data Security**

Planpanion LTD has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, access to your personal information is limited to those employees, consultants, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and under a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so following our Data Security Policy and Breach Procedure.

## Your Data Subject Rights

Individuals have the right to:

- make a Subject Access Request (SAR) (see below)
- withdraw consent to data processing at any time where consent is the sole lawful basis for the processing of that data
- ask us to rectify, erase or restrict the processing of your personal data, or object to the processing of it (in certain circumstances)
- prevent the use of your personal data for direct marketing
- challenge processing which has been justified based on our legitimate interests
- request a copy of agreements under which your personal data is transferred outside of the UK, (if relevant)
- object to decisions based solely on automated decision-making or profiling (Planpanion LTD does not use automated decision-making or profiling).
- be notified of a data breach in certain circumstances
- make a complaint to the ICO; and
- ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

For more information relating to your rights please see here [A guide to individual rights | ICO](#)

## Exercising your Data Subject Rights

Where we act as the Data Controller rights requests may be made directly to us (see '[Contacts](#)' below).

Where we are acting as the client's Data Processor, the request will be forwarded to the client without response.

Planpanion will assist the client in the fulfilment of their obligation to respond to any rights request if the response requires our assistance and the provision of information and documentation.

### The Right to Withdraw Consent

Where an individual may have provided consent to the collection, processing, and transfer of your personal information for a specific purpose – e.g., so we can send you marketing material, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact Planpanion LTD in writing using the contact details below.

## Concerns

If you have any questions or concerns about how we process personal data, or if you wish to exercise any data protection rights, please contact Planpanion LTD in the first instance, using the details below

If you have concerns that we and/or our Data Protection Officer are not able to resolve to your satisfaction you can register a concern with the UK's data protection regulator, the Information Commissioner's Office by following this link <https://ico.org.uk/make-a-complaint/>

Or, write to:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Tel: 0303 123 1113

**Contacts**

Data Controller: Planpanion LTD, 43a St Marys Road, Market Harborough, Leicestershire, LE16 7DS (registered office)  
Email: [help@planpanion.co.uk](mailto:help@planpanion.co.uk)

If you have any questions or concerns about how we process personal data, or if you wish to exercise any data protection rights, please email your query to [help@planpanion.co.uk](mailto:help@planpanion.co.uk)

Data Protection Officer: The Schools People. 44 Tyndall Court, Peterborough, PE2 6LR  
Email: [DPOService@schoolspeople.co.uk](mailto:DPOService@schoolspeople.co.uk)  
Tel: 01773 851 078