

ABOUT OUR PRIVACY NOTICE

Wisdom Canvas Ltd ("we" or "us") is dedicated to upholding the privacy, safety, and security of our registered (and potential) users, including students, teachers, school administrators, and parents (collectively referred to as "Users").

This notice, along with our terms and conditions of use, provides a clear explanation of who we are, the ways in which we collect, share, and utilise personal information regarding users, and how users can exercise your privacy rights when interacting with our products. We urge users to carefully read through this notice to fully understand the treatment of any personal information provided. Should you have any inquiries or concerns regarding how we handle your personal information, we encourage you to reach out to us using the contact information found at the end of this Privacy Notice.

Depending on the specific situation, we may process Personal Information either in the capacity of a Service Provider/Processor or as a Controller, as these terms are outlined in the UK GDPR.

In this Privacy Notice, when we mention "personal information," we are referring to any data that is classified as personal information or personal data under relevant data protection legislation.

Additionally, we offer a version of this Privacy Notice that is tailored for children, available on our website.

WHAT PERSONAL INFORMATION DO WE COLLECT WHEN YOU UTILISE OUR PLATFORMS?

Wisdom Canvas Ltd gathers several types of personal information, categorised as follows:

For School Users

When schools or educational institutions subscribe (including trials) as "School Users," we may collect:

- The school's name and address for billing and account management.
- Teachers' names and email addresses to create accounts and facilitate communication.
- Students' names, year groups, pupil number and classes to manage accounts effectively.

- Students' reading level, assigned reading bands, books read, comments, reading activity (including but not limited to, pages read, words read, time spent reading)

Additional Interactions

Should you reach out to us, we may collect details of your interactions with our services, including any additional information you or your Users voluntarily provide, through customer support, finance, and technical support engagements.

In this context, "lawful basis" refers to the justification for processing personal data under applicable data protection laws.

This information is vital to fulfil our contractual commitments to you, ensuring accurate identification and management of user accounts, and facilitating other outlined purposes. Typically, it's not feasible for Users to remain anonymous, as this could impede our ability to provide services, grant Site access, or respond to inquiries. While Users may choose to provide pseudonyms or anonymized data for students, such as initials, this may limit the platform's administration and progress tracking capabilities.

By registering on any of the Sites and supplying the requested personal information under any agreement type, schools affirm a lawful basis, as defined by applicable data protection laws, to provide this data on behalf of all Users (teachers and students included). Schools must ensure they have a valid lawful basis for submitting data. If "consent" is the chosen lawful basis, schools must obtain and verify necessary parental consent for student data. Should a school lack a valid lawful basis for data provision at any point, affected Users should cease Site usage, and the school must inform us to facilitate data deletion.

We refrain from collecting unnecessary personal data, such as religious beliefs or medical history. Any irrelevant personal information received inadvertently is promptly destroyed or anonymised, unless provided under guidance that this data is essential for operations or activities and complies with legal standards.

Children's Registration and Consent

Children under 16 cannot directly register on our Sites due to legal restrictions on agreeing to Terms and Conditions. Registration must be completed by a teacher, tutor, parent, or guardian, who is also responsible for securing the necessary consents for Site usage, including trial periods.

HOW WISDOM CANVAS LTD GATHERS PERSONAL INFORMATION

The personal information we gather about Users can be categorised as follows:

Information You Provide Voluntarily

- We may collect personal information directly from you or through our interactions with School Users or Home Users. This collection can occur through various means such as filling out forms on our Sites, or communicating with us via email, or otherwise. This includes information you offer when you create an account, participate in a competition or survey, opt-in to our marketing communications, or make enquiries.
- We will clarify the specific personal information you need to provide, and the reasons for its collection, at the time we request it from you.

Information Collected Automatically

- When you visit our Sites, certain information may be automatically collected from your device. In some jurisdictions, including within the European Economic Area, this data may qualify as personal information under relevant data protection laws.
- The automatic collection might include details such as your IP address, device type, unique device identifiers, browser type and version, time zone, operating system and platform, general geographic location (e.g., country or city-level), and other technical details. We also gather data on how your device interacts with our Sites, like pages visited, links clicked, download errors, time spent on pages, interaction with pages, and navigation away from pages.
- This automatically collected information helps us to better understand our Users, their origins, and which aspects of our Sites they find most engaging. We utilise this data for internal analytics, aiming to enhance the quality and relevance of our Sites for our Users.
- We collect data on the responses Users give to questions within each programme and the time taken for each response. This information is essential for providing statistical feedback to teachers and parents about the students' performance and progress, which is a fundamental feature of our products.
- Part of this information may be gathered through cookies and similar tracking technologies, as detailed in our Cookie Policy.

WHAT WISDOM CANVAS LTD DOES WITH YOUR PERSONAL INFORMATION?

The personal information collected from Users, including those considering our services, is utilised in the following ways:

- To fulfil our commitments under any agreements made between you and us, providing you with access to our products and services, including the Sites.
- To confirm your registration with our service.
- To manage and administer accounts, which includes resetting usernames and passwords, addressing User inquiries, contacting Users regarding any issues with their accounts or their use of our products and services, or their behaviour on the Sites.
- To offer quotations or details about our products and services.
- To assess Users' recall speeds.
- To generate results data for individual Users, classes, or entire schools, preparing statistical reports and conducting data analysis to improve the educational value of our Sites.
- To provide guidance on utilising certain aspects of our products or services and inform you about new features on our Sites.
- To inform you of changes, enhancements, and updates to our products, services, and the Sites.
- To ensure our Sites are presented optimally for Users and their devices.
- To maintain the safety and security of our Sites.
- To announce the names of winners and high achievers on the Sites and distribute awards or certificates for Users' progress.
- To manage our Sites for internal purposes, such as troubleshooting, data analysis, testing, research, product development, quality assurance, statistical, and survey purposes.
- To distribute newsletters and emails about our products and services, including the Sites, and information on forthcoming events, competitions, and rules of the Sites.
- To share information about third-party services we believe may interest you, but only where we have your explicit or implied consent to do so, or where we are legally allowed to contact you. Should you prefer not to receive these updates, you can opt out at any time by following the unsubscribe instructions provided in our communications or by updating your details on the "My Details" section of our Sites.

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

The foundation for our collection and use of personal information is contingent on the nature of the information itself and the circumstances under which it is collected. Typically, we gather personal information from Users either to fulfil our contractual obligations in delivering our products and services, or when we have obtained the Users' consent. Additionally, we may process personal data if doing so aligns with our legitimate interests, provided these interests are not outweighed by your rights to data protection and privacy.

SHARING YOUR PERSONAL INFORMATION WITH THIRD PARTIES

It's important for Users to be aware if their personal data is being shared with any third parties. We refrain from engaging in targeted advertising on our platforms and do not sell Users' personal information. We commit to maintaining the confidentiality of personal information and will not willingly disclose Users' data to advertisers or external entities. Nonetheless, the following entities might have access to, process, or receive transfers of your data:

- Our subcontractors who assist in the creation, enhancement, and provision of the Sites (Users are notified of these entities in advance as listed in our standard Terms and Conditions, with any significant updates communicated via email);
- Third-party service providers engaged to support our business operations, as pre-notified to Users. These providers are authorised to process your personal data solely to offer these services to us. Such services might include payment processing, customer support, marketing efforts, security enhancement of our Sites, and other activities that involve processing personal information as described in this Privacy Notice or as communicated at the time of data collection.
- Educational government departments, universities, school management or representation bodies, or the schools themselves, for the purpose of enriching the educational content of our Sites through statistical reports and analysis. Any data shared with such entities for their analysis is provided either in aggregated (non-personal) or de-identified form, ensuring individual students cannot be directly or indirectly identified.
- Competent law enforcement agencies, regulatory bodies, government authorities, courts, or other third parties when disclosure is deemed necessary for compliance with legal obligations, protection or assertion of legal rights, enforcement of our terms and conditions, or protection of your vital interests or those of others;
- A prospective purchaser (along with its agents and advisers) in the context of a proposed sale, merger, or acquisition of any part of our business, with the stipulation that the buyer can only use your personal information for the purposes outlined in this Privacy Notice;
- Any other individual, provided we have your consent, or legal obligation for such disclosure, in accordance with applicable data protection laws.

HOW WISDOM CANVAS LTD ENSURES THE SECURITY OF YOUR PERSONAL INFORMATION

Wisdom Canvas Ltd employs stringent technical and organisational safeguards to protect the personal information we collect and process during your engagement with our products. The data we collect is securely stored on servers within Europe. Our security practices are crafted to ensure a level of protection suitable for the risks associated with processing personal information. These practices include, but are not limited to, data encryption, multi-factor authentication for accessing our systems, the use of firewalls and antivirus malware protection, comprehensive staff training in data security, and robust access controls. We continuously

assess our security protocols against new technologies and methods as part of our commitment to privacy compliance.

Our platforms are ad-free and do not support in-app purchases, ensuring a safe environment for students, who are also unable to chat or share personal information through our services.

A comprehensive list of our service providers can be found in our terms and conditions.

The responsibility for maintaining the confidentiality of passwords rests with you and your students/children. We advise against sharing passwords.

We expect all employees and contractors to adhere to this Privacy Notice and take decisive action against any breaches of the obligations it imposes.

In our dealings with third-party service providers, essential to operating and managing our Sites and services, we disclose only the minimal necessary information. Through diligent vetting, we ensure these third parties adhere to data protection standards and maintain robust data security. A legally binding contract, or Data Processing Agreement (DPA), is established with each to further secure and protect your data.

INTERNATIONAL DATA TRANSFERS

We acknowledge that your personal information may be transferred to and processed in countries outside of your own, which may have different data protection laws than those in your country of residence.

Rest assured, we have implemented appropriate safeguards to ensure that your personal information is protected in accordance with this Privacy Notice and relevant data protection legislation. Further details regarding these safeguards can be provided upon request.

If we transfer any personal information about you to countries outside the EEA, we will take appropriate measures to ensure that the respective recipient protects your personal information adequately in accordance with this privacy policy. These measures may include the following permitted in Articles 45 and 46 of the General Data Protection Regulation:

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US PrivacyShield (see further <https://www.privacyshield.gov/welcome>); or
- in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

DATA RETENTION

We will hold onto personal information collected from Users as long as there is a valid business reason for doing so (for instance, to deliver a service you have requested or to adhere to legal, tax, or accounting obligations).

Should there no longer be a legitimate business reason to process a User's personal information, or upon your request to erase such information, we will either delete or anonymise said data in line with applicable data protection laws. The complete removal of personal information from all our backup systems may take up to 30 days.

We may also need to maintain and utilise some personal information to meet legal and regulatory responsibilities, or to resolve disputes.

We advise schools to delete student data and accounts when a student leaves the institution, in compliance with relevant regional legislation and data protection laws.

YOUR RIGHTS REGARDING DATA PROTECTION

Under the framework of the UK GDPR and other relevant data protection laws and state legislation, Users are granted certain rights concerning their personal information. These rights vary depending on the applicable data protection laws. Below are the rights available to you, with specific mentions where differences occur:

- We are committed to transparency in how we process your personal information, as detailed throughout this Privacy Notice. If you wish to understand more about this processing, you can reach out to us using the contact information provided in the "How to contact us" section.

- At any time, Users have the right to request access to, correction of, updating of, or deletion of their personal information or their institution's data (for educators). This can be achieved by contacting us directly.
- Parents, guardians, and caregivers can access, review, amend, delete, or refuse the collection of their child's personal information. These actions are to be coordinated with the child's school in alignment with UK GDPR regulations. Contact us for these requests.
- Parents, guardians, and caregivers also have the authority to halt the collection and usage of their child's personal data, coordinated with the school in compliance with UK GDPR
- Furthermore, Users can object to our processing of their personal data, request a limitation on such processing, or ask for the portability of their personal data. These rights can be exercised through the provided contact details.
- Users can opt-out of data sharing for targeted marketing by us at any moment by clicking the "unsubscribe" or "opt-out" links in our marketing emails or by adjusting their preferences in the "My Details" section. Alternatively, contact us directly.
- If we've collected and processed your personal information with your consent, you are entitled to withdraw that consent at any time. Withdrawal will not impact the lawfulness of processing before the withdrawal, nor processing based on lawful grounds other than consent. Consent can be withdrawn by contacting us.
- Should you have concerns about our processing of your personal data or wish to exercise your rights, we encourage you to contact us first. However, you also have the right to lodge a complaint with a data protection authority. For more details, please reach out to your local data protection authority

We aim to respond promptly and appropriately to all requests from individuals wishing to exercise their data protection rights, in accordance with applicable laws.

UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice to reflect changes in legal, technical, or business matters. If there are significant updates, we will inform you via email. We recommend checking the notice when you log in to our Sites and platforms. Your continued use of the Sites after any changes indicates your acceptance of the updated terms, as required by data protection laws.

The date of the last update can be found at the beginning of this Privacy Notice.

HOW TO CONTACT US

For any questions or concerns regarding the handling of your personal information, please reach out to the following address: support@storyzoo.org.