

PRIVACY POLICY

At Itza Media Limited we want to be completely transparent about why we need the personal details we request when you engage with us and how we will use them.

As you browse our websites and whenever you communicate with us, we collect information. It deepens our understanding of what works and what doesn't, which helps make our communications more effective. The more we understand about our users and the people we engage with, the more efficiently we are able to provide you with a personalised experience when browsing our sites.

We take protecting your privacy very seriously and will always take all reasonable steps within our power to make sure your information is safe.

This privacy policy applies to all personal information we collect or process about you. 'Personal information' is information, or a combination of pieces of information, that could reasonably allow you to be identified.

Please read this policy carefully, along with our website Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

We may update this policy from time to time without notice to you, so please check it regularly, **particularly if you are sending personal information to us**. Any significant changes will be notified to you.

If you have any questions please contact our team by writing to us at Itza Media Limited, The Fisheries, 1 Mentmore Terrace, London, E8 3PN or email us at: contact@itzamedia.com.

1. WHO WE ARE

Itza Media Limited is a private company registered in England & Wales with company number 11005147. In this policy, whenever you see the words 'Itza', 'we', 'us' or 'our', it refers to this company. This organisation is a Data Controller.

We collect information every time you interact with us. The type and quantity of information we collect and how we use it depends on why you are providing it.

2. WHEN WE COLLECT INFORMATION FROM YOU

There are many instances in which we may collect information about you. For example, we may collect information when you:

- Sign up for Live quizzes or the Learning Challenges on one of our websites
- If you are a teacher and you sign up for our on-line teacher portal
- Visit one of our websites or social media pages via tools such as cookies and online identifiers, including if you make comments on our message boards or discussion forums
- When you interact with our website in either learning content or quizzes
- Contact us or become involved with us in any other way than as stated above.
- Apply for a job with us
- Request information from us

3. WHAT WE COLLECT

The information we collect depends on whether or not you are a teacher or a learner. The information we may collect from the above interactions may include, but is not limited to any of the following:

a.) For Teachers:

- Your name, telephone number, email address and your school, along with preferences as to how we should contact you in the future.

b.) For Learners:

- Your name (optional), email address (optional), school (optional, although you will need to give your school to take part in school-based competitions).
- Information you enter onto our website, including information to take part in challenge events name, your user ID and contact information.
- Any other details which you give us including your reasons for doing so.

c.) Usage Data:

- We collect data on what learners do on our site in order to improve our products and to be able to provide the best learning experience possible for each individual. We want to give personalised feedback and help each unique learner best. The types of usage data we collect, by way of a non-exhaustive list:
 - Numbers of page visits, time spent on site, responses to questions, content viewed
 - Details of your visit to our websites, including technical information such as the IP address you use to access the website, your device, browser type and version

The only instance in which we might collect sensitive categories of information is if you apply for a job with us. In this case, we may collect information about your race or ethnicity, religious beliefs or sexual orientation. This information will only be used for equal opportunities monitoring. We may collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. You will be provided with a separate data protection policy when the information is requested so you are aware of how your data will be collected, used and stored.

4. HOW WE COLLECT INFORMATION ABOUT YOU

We use different methods to collect data from and about you including through:

a.) Direct Interaction

We get information directly from you, for example when you sign up on one of our websites. For information about when we may collect data about you, see the section above *When We Collect Information*.

b.) Automated Technologies or Interactions

If you enter your details onto one of our online forms, and you don't 'sign up', 'send' or 'submit' the form, we may contact you via email to see if we can help with any problems you may be experiencing with the form or our websites.

Similarly, if you receive an email, open it, don't open it, select a link, browse our website, we collect this information so we can see which communications are popular and which aren't. Then next time we'll do better so that more people can be inspired by the communications we send.

When we're seeing what people do online like this, we're using cookies. Accepting cookies from us helps us to understand who is visiting our websites and target our sites communications more effectively. If you don't want cookies, you can set your browser to notify you when you receive one, then choose to decline it. Please read our separate [Cookies Policy](#) for more information. Please note that if you disable or refuse cookies then some parts of our websites may become inaccessible or not function properly.

c.) Third parties

In signing up for a third-party service, you may have agreed for your data to be passed to other organisations such as ours. When we use this data, we check that we are entitled to it by reviewing the privacy notice of that third party to ensure that it informs people that their

data may be passed to us. An example of where we do this is with a teacher database, where by agreeing to join the teacher database, you agree that your information will be made available to other organisations. We may use this information to contact you about our schools and youth programmes or teacher resources related to our mission.

5. WHAT WE USE YOUR INFORMATION FOR

We use personal data for a number of different processing activities which include:

- Providing you with the services you have requested
- Keeping a record of your relationship with us
- Managing your communication preferences, including marketing preferences
- Understanding how we can improve our services, products or information
- Sending you tailored communications which we think will be of interest to you
- Sending you marketing materials including on company updates and events
- Inviting you to events and to take part in campaigns and support our work
- Analysing our database for statistical purposes, and to better communicate with you about things we think will be of interest.
- Analysing usage and trends and personalize and improve the Service and your experience using the Service
- For the purpose of maintaining and running Itza's global educational competitions for students.

6. OUR LEGAL BASIS FOR PROCESSING DATA

All of our use of personal data is in accordance with the law. The law requires us to only process data where we have a valid legal basis for doing so. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (as set out below).
- Where we need to comply with a legal or regulatory obligation, (for example reporting to Companies House, and other regulatory bodies to satisfy our legal, regulatory and compliance obligations).
- Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending email, phone, direct marketing communications about campaigns and events. You have the right to withdraw your consent to marketing at any time by contacting us or clicking the unsubscribe link in the email communication we send you.

Itza's legitimate interests include administering the company, sending you marketing materials by email, phone and post, and understanding our users. A summary of each of these and some examples of how we may use your data in these ways on the basis of it being within our legitimate interests to do so are set out below:

1. **Administration of the company.** we need to undertake certain processing activities. Some of these will be to govern our company and some will be for operational administration reasons.

Specific examples of processing activities under this legitimate interest include:

- Recording your communication and marketing preferences and maintaining suppression files so we don't contact you when you have asked us not to

- Keeping a record of who our user are, your relationship with us, and your history of using our websites
- Reviewing our database of users across the organisation for historical, scientific and statistical purposes so as to improve the services we provide to you
- Operational administration such as:
 - Recruiting and processing job applications
 - Keeping employee records and monitoring
 - Health and Safety
 - Management and planning purposes
 - Thanking you for your support
 - Keeping you up to date with the work we do
- Financial management and controls such as processing supplier invoices

2. To contact you by email, post and phone. Contact with our users is key to the way we operate – when you sign up on one of our websites it enables us to keep in touch with you and keep you up to date with the numerous activities you can get involved with.

Specific examples of processing activities under this legitimate interest include sending marketing materials to:

- Invite you to try new products or services
- Take part in surveys and support our product development
- Invite you to events or activities by email, post and phone

3. Understanding our Users. It is important that we understand our users. If we don't understand you, then we cannot communicate with you in a meaningful way, and in a way which will be engaging and interesting. If we understand you, then we are better able to direct communications to you which you will be interested in. In order to understand our users better, we undertake a number of processing activities including analysis, research, profiling and customising your experience as detailed in this policy.

Specific examples of processing activities under this legitimate interest include:

- Analysing our database and evaluating the performance of our features. This helps us develop our products and services, and helps inform our product development strategy so we only send you information that we think will be of interest to you, and so that we understand the effectiveness of the information we present to you.
- Researching your interests, so that we deliver content we think will be relevant to you and personalised when appropriate.
- Customising your experience and displaying more relevant content or information to you.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please contact us.

7. WHAT WE COMMUNICATE WITH YOU ABOUT

We communicate with you about what you have asked us to – to provide the product or service you have requested. For example, if you have signed up to a specific website, we will keep you in touch with our developments on that website.

In addition to news and updates on our work, we may also contact you about some other things (note: these detail examples of the types of communications we may send, and are not

exhaustive):

- **Development:** we'd love to tell you about our product and service development work so that you can get involved. This could be telling you about activities, responding to questionnaires, joining focus groups or the Itza Club.
- **Events:** we run a host of events from Live Learning Challenges, on-line competitions, and special teacher events which we may like to invite you to.

The law distinguishes between the channels you choose to receive this information, and so we give you different options when we ask to use your data in this way.

We will always ask for your consent if we want to contact you by email, however we do not normally ask for consent to make telephone calls to you or write to you (provided you haven't specifically told us you don't want to receive them or if your telephone number is registered on the Telephone Preference Service).

When you give us your details, we will tell you what we are going to do with them. You will always be given the opportunity to opt-out of receiving these materials by phone and post if you prefer not to. You can unsubscribe from these communications at any time either contacting us directly via our email address: contact@itzamedia.com or by clicking on the unsubscribe link in our emails. We will also always provide an opportunity for you to opt-out in every communication we send you about our activities.

Where you have previously provided us with your telephone number, please note that we may use that telephone number to call you (provided you are not registered with the Telephone Preference Service - TPS). You can of course change your preferences at any time if you wish to by contacting us.

Please note that changing your marketing preferences will not affect the communications we send you where it constitutes the service you have requested – for example, if you have signed up to join us as a member of the Itza Club then you tell us you do not wish to receive information on a particular product or website, you will still receive your club membership updates until you tell us you no longer wish to be a member.

8. WHO WE SHARE OUR INFORMATION WITH

We do not sell or share personal details with third parties so that they can market to you and our licensing partners hold no personal data on registered users of Itza educational resources.

As with other organisations, we do not undertake all of our processing activities ourselves and we appoint suppliers to help us. For example, if you opt to take part in a Live Learning Challenge we will share your login details with our partners in order to authenticate you on their platform, we also use third party systems to hold our data in the cloud with providers such as Microsoft Azure and Amazon Web Services. In these cases and others, we ensure that we have a contract with the third party supplier and as part of that agreement the supplier agrees to respect the security of your personal data and to treat it in accordance with the law. We only permit suppliers to process your personal data for specified purposes and in accordance with our instructions.

If you would like further information on our third-party processors, please contact us.

International Transfers of personal data

In certain circumstances, your personal data may be transferred outside of the UK.

If we transfer personal data outside of the UK (for example to one or more of our service providers), we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy policy and in accordance with data protection law. This can be done in a number of ways, for instance:

- The country that we send your personal data to might be approved by the Information Commissioner's Office as having adequate level of protection; or
- The recipient might have signed up to a contract based on "model contractual clauses" approved by the Information Commissioner's Office, obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the UK. In all cases, however, we will ensure that any transfer of your personal data is compliant with applicable data protection legislation.

You can obtain more details of the protection given to your personal data when it is transferred outside the UK by contacting us.

Social Media

Depending on your settings and the privacy policies for social media and messaging services like Facebook and Twitter, you might give us permission to access information from those accounts or services. We provide personal information such as your email address to Facebook to enable them to determine if you are a registered account holder with Facebook. Our adverts or promotions may then appear when you access Facebook and on your Facebook feed. Your data is sent in an encrypted format that is deleted by Facebook if it does not match with a Facebook account.

For more information please read the Facebook Business page about Custom Audiences : (<https://www.facebook.com/business/help/744354708981227?id=2469097953376494>) and Facebook's Data Policy : <https://en-gb.facebook.com/policy.php>

Where Required

In other cases we will not disclose any of your personal data except in accordance with this policy, or when we have your permission, or under special circumstances, such as when we believe in good faith that the law requires it or to protect the rights, property and safety of Itza, or others. This includes disclosing your details if required to the police, regulatory bodies or legal advisors.

9. HOW WE KEEP YOUR DATA SAFE

We have appropriate physical, technical and managerial controls in place to protect your personal details; for example, our online forms are always encrypted and our network is protected and routinely monitored. Within our office only those who have a business need to access your information and who are trained in handling data securely will have access to your information. We have put in place appropriate security measures to prevent your personal data from being

accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Whilst we hope it will never happen, we have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.

Our website may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Despite all of our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention that you do so at your own risk.

Where we have given you (or you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential, and we ask you not to share this with anyone

10. HOW LONG WE KEEP YOUR DATA FOR

We will only keep your personal information for as long as is necessary for the purpose for which it is collected, which may include the purpose of satisfying any legal, accounting or reporting requirements. If you request that we stop sending you communications, we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us.

Retention:

In order to determine how long we keep your data we look at the category of data and the reason we collected and have processed it. We look at whether that reason is ongoing and whether you are an active user or not. We consider you to be an active user if you have opened our mailings and have interacted with us in some way such as if you have corresponded with us, signed up for a service or product any time within the preceding two years.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

Support date:

If at any time you cease to become an active user then we continue to send you communications for a limited period of time (no more than two years for email communications, post and phone calls).

Other data:

As detailed above, we may hold personal data about individuals who interact with us in other ways such as CVs for candidates applying for a job with Itza. We have a data retention policy which addresses each type of information we hold. Please get in contact if you would like to find out more about how long data is kept in these circumstances.

What happens when we anonymise or delete your data:

When we anonymise or delete your data, we will ensure that it is no longer identifiable to you. We may keep anonymised data for future analysis on aggregated data so that we can understand our users better. This may be for research or statistical purposes, or for any other purpose, and we may use this information indefinitely without further notice to you.

11. HOW TO FIND OUT WHAT INFORMATION WE HAVE ABOUT YOU

You can request the details of the personal information we hold about you.

If you want to access your information, please contact us and send a description of the information you want to see and proof of your identity.

We may then need to ask you for further information in order to service your request, such as confirmation of your identity, or whether there is any specific data you would like or from a specific time period. We may send you a form in order to assist you in this.

We will respond to you within one month of your legitimate request. You will not have to pay a fee to access your personal data however we may refuse to comply with your request if your request is clearly unfounded, repetitive or excessive.

12. HOW TO CHANGE THE WAY WE CONTACT YOU

You can ask us to stop sending you communications at any time by contacting us, or by following the opt-out links on any email message sent to you.

If at any time you'd like us to change how we contact you (via email, phone or post), please contact us via email.

We will only email you if we believe you have consented for us to do so. In every email we send there will be instructions on how to unsubscribe. During any phone conversation you have with us please feel free to let us know how you prefer to be contacted.

Due to the timing of our mailings, there may be a delay of up to four weeks before your instruction is actioned and during this time you may still receive mailings from us. There is no need to contact us again. If you are still hearing from us four weeks after you have asked us not to contact you then please contact us.

Please note that if you request that we stop sending you communications we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us.

13. WHAT TO DO IF YOU DON'T WANT US TO PROCESS INFORMATION ABOUT YOU

If you don't want us to collect information about you as you browse our websites, you'll need to set your browser to notify you when you receive a cookie, then choose to decline it.

If you don't want us to hold any personal details about you, it's best just not to give them to us. If you want us to stop collecting information about you or processing that information, then please let us know by contacting us.

What to do if you objecting to our processing:

If you object to any of the processing described in this privacy policy, then you have the right to object to that processing in certain cases. Unfortunately, this means that we may not be able to process your data any longer or provide you with certain information or services.

We will need to keep a copy of your name, postcode and email address so that we can identify you on our suppression list to ensure we do not contact you any further or process your data in the way that you have objected to.

14. YOUR RIGHTS

Under data protection laws you have various rights over your personal data. If you would like to exercise any of these rights, then please contact us.

You have the right to request access to your personal data, commonly known as a 'subject access request'. This enables you to receive a copy of the personal data we hold about you.

You can request that we correct the personal data we hold about you. This enables you to have incomplete or inaccurate data we hold about you corrected, although note that we may need to verify the accuracy of the new data you provide to us.

You have the right to ask us to erase your personal data in certain circumstances. Please note however that there may be circumstances where you ask us to erase your personal data, but we are legally required or entitled to retain it.

Where we are processing your data under the legitimate interest condition, then you may object to this processing, or request that the processing be restricted, if there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note that there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally required or entitled to continue to process your personal data and/or to refuse your request.

In some cases, we may demonstrate that we have a compelling legitimate ground to process your information which override your rights and freedoms.

In certain circumstances you are able to request a transfer of your data from one service provided to another, such as from one service provider to a competitor.

Where we have asked you for consent to process your data, you may withdraw this consent at any time by contacting us. Please note however that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.

15. CHANGES TO THIS POLICY

This policy was last updated in June 2021. We may amend or update this policy at any time to take account of any changes to data protection law or other legislation. When further updates to the policy are made they will be posted on this page, so please check back here regularly. Any significant changes will be notified to you.

16. FURTHER INFORMATION

The laws that dictate how your personal information can be used are:

- The Data Protection Act 1998
- The Privacy and Electronic Communications Regulations 2003
- UK General Data Protection Regulation 2021

Complaints

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.

For full details of our complaints procedure and how to make a complaint please contact us.

If you have a complaint, then please contact us in the first instance and we hope to be able to resolve your complaint. If however, you believe that we have not been able to assist with your complaint or concern then you have the right to make a complaint to the data protection authority in the UK, which is the Information Commissioner.

You can contact the Information Commissioner's Office at ico.org.uk to find out more or report a concern. They are the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. We work with them to make sure that we collect, store and use your information appropriately and don't do anything you wouldn't expect us to.

17. CONTACTING US

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please contact our team by writing to us at Itza Media Limited, The Fisheries, 1 Mentmore Terrace, London, E8 3PN or email us at: contact@itzamedia.com.