

## *White Space Ltd Privacy Policy for Wordshark Online and other White Space Ltd products - for Schools and Tutors*

***Last Updated April 2021***

*KEY DATA PROTECTION FACT;*

- *Our ICO (Information Commission Office) registration number is ZA475290.*
- *For queries relating to data protection, your contact is Ruth Savery, Company Director at White Space Ltd.*

*White Space Ltd Products:*

- *Wordshark Online*
- *Wordshark v5*
- *Numbershark v5*

***A user purchasing, trialling or using a complimentary subscription to Wordshark Online will be deemed to be a subscribing customer.***

*The details of this policy may vary from time to time as we seek ever more ways to improve our security. We may*

- *Change where your data is stored*
- *Change what types of personal data we store*
- *Make a change to a third party data processor*

*These will be reflected by changes on this page and the administrator for your Wordshark online account will be notified by email. You can see when this Privacy Policy was last updated by checking the updated date displayed at the top of this Privacy Policy.*

*What do we collect?*

*To enable us to provide you with the products you or your organisation subscribes to and to communicate with you, we request, store and process specific personal data relating to you. It is impractical in most circumstances for you to remain anonymous, and we may not be able to interact with you, provide access to any of the products or answer any enquiry if we are not able to identify you or collect your personal information.*

*We may obtain this directly from you or from other users within your organisation voluntarily by filling in forms on our site, or by corresponding with us via phone, email or otherwise.*

*This includes information that you provide when you register an account with us direct or via a reseller agent, renew, use our services, enter a competition or survey, subscribe to marketing communications from us, and/or submit enquiries to us.*

*For marketing purposes we may collect your personal data where the processing is in our legitimate interests or where we have your consent to contact you, which is not overridden by your data protection interests or fundamental rights and freedoms.*

*You can however withdraw your consent to receive marketing material at any time by contacting us at [online@wordshark.co.uk](mailto:online@wordshark.co.uk) or telephoning 020 8748 5927.*

### ***The information that we collect, and the use to which it is put***

*We collect the following personal data from you:*

- *Name*
- *Contact telephone number*
- *Email address*
- *Business address*
- *Job title*

*This information is used for the purposes of the fulfilment of our contract with you - we use it to set up an account for you, to bill you, to manage your account and provide customer support. Without this information, we would be unable to provide you with the product.*

*Where you have subscribed to a free trial or are a complimentary user, we will use the information provided to contact you at the end of the trial to market the paid for versions. This is a legitimate business interest of ours.*

*For Wordshark online we also collect and hold your information for the purposes of research and development, and to market our services to you, where you have agreed that we can do this. These are legitimate business interests of ours, and you can opt out of this communication at any time.*

*We may also use your information if we need to seek professional advice.*

There will also be cases where we have a legal obligation to provide information (such as to HMRC or to the police), and we will comply with our legal and regulatory obligations as and when they arise.

### **Who do we share your data with**

We do not sell users' personal data to external 3rd parties. We may, however, use specific 3rd party processors that are;

- Contracted to enable us to carry out our obligations arising from the terms and conditions entered into with our customers.
- To assist with business processes such as accounting services and customer support.
- Providing marketing services such as email, telemarketing and direct mail campaigns.

Finally, as explained above, we may be required to disclose your personal data to competent law enforcement and regulatory bodies, or with other third parties to enable us to meet our legal and regulatory requirements.

Our third-party processors for Wordshark online are:

	<i>Company</i>	<i>Purpose</i>
1	<i>Amazon Web Services, inc.</i>	<i>Data hosting and storage in the UK</i>
2	<i>Zoho Corporation</i>	<i>Accounting software, subscription management software, customer relationship management and bulk email broadcasting system (for the distributions of email newsletters and promotions).</i>
3	<i>Saggezza Limited</i>	<i>Website and software development services.</i>
4	<i>Buckhill</i>	<i>Server maintenance and IT related services.</i>
5	<i>TechEd Marketing</i>	<i>Product development services and marketing consultancy.</i>
6	<i>Martin Newman</i>	<i>IT and software development related consultancy services.</i>

For all other products, only lines 2, 5 and 6 in the above table apply

## **Security**

*We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect and store.*

*All data is encrypted at rest and in transit using industry standards.*

### **How do we your store data and for how long**

*We store your data within the UK . When we need to send personal data outside of the UK, we ensure safeguards are in place for the third party data processor to provide the same level of protection for personal data as there is in the UK. We can provide you with details about where we are sending your personal data.*

*If you have any questions about the safeguards that are in place please contact Ruth Savery.*

*We will only keep data whilst we have a legitimate reason to. Otherwise the data will be deleted. For example if you terminate your Wordshark Online subscription or it lapses, any personal data is held for 12 months. Otherwise after this period, data relating to your organisation's users will be automatically deleted from the relevant product platform.*

*The administrator of your account and any staff users at your organisation will be retained on our customer relationship management system and email system, to make it easy to re-activate your account should you change your mind and to continue receiving product newsletters and marketing updates. They will have the option to unsubscribe at any time.*

*We do reserve the right to retain and use personal data where required to comply with legal obligations, to resolve disputes, and/ or to enforce our terms and conditions.*

## **Cookie Policy**

*A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We will not store personal data.*

*We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and to improve our website by tailoring it according to customer needs.*

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However this may prevent you from taking full advantage of the website.

### **Controlling your personal information**

The GDPR provides the following rights for individuals whose personal data is processed:

1. *The right to be informed*
2. *The right of access*
3. *The right to rectification*
4. *The right to erasure*
5. *The right to restrict processing*
6. *The right to data portability*
7. *The right to object to processing*
8. *Rights in relation to automated decision making and profiling. (We do not carry out automated decision making and profiling)*

To request amendment or deletion of information relating to you or your organisation, simply email or write to us using the contact details provided in the 'How to contact us' heading below, instructing us on the data that needs to be changed or deleted.

We will then immediately delete your personal data unless there is a legal reason why we need to keep your personal data. In that circumstance we will let you know and destroy your personal information as soon as we are legally entitled to do so.

On a regular basis we send product update news via email. All recipients have the right to opt out or unsubscribe from this communication by clicking on the unsubscribe link. Alternatively recipients can email us to opt out of receiving further newsletters.

***Right to lodge a complaint with the Supervising Authority***

*If you have any concerns or complaints about how we use your personal data we hope you will alert us to these directly (see the Contact information below). In any event you are entitled to complain to the Information Commissioner's Office (ICO) which is the supervisory authority in the UK. Their contact details and the procedure can be found at [www.ico.gov.uk](http://www.ico.gov.uk)*

***How to contact us***

*If you have any questions or concerns about our use of your personal information, please email: [online@wordshark.co.uk](mailto:online@wordshark.co.uk) or write to White Space Ltd, 1 Lochaline Street, London W6 9SJ.*