

How we accommodate the General Data Protection Regulation (GDPR)

‘The Right to be Informed’
‘The Right of Access’
‘The Right of Rectification’
‘The Right of Erasure’

‘The Right to Restrict Processing’
‘The Right to Portability’
‘The Right to Object’

LAWFUL BASIS AND TRANSPARENCY

Smart Kids runs the GrowtheCode.org. We collect very minimal information from parents and teachers. The information relating to children comes from the respective parent and/or teacher and does not extend beyond their name, group and assessment results.

We do not need their full name and recommend schools use a nickname or code.



Collecting data for a purpose

Account

Data email

Access to data

Access to data is restricted and allowed only as required with strong directives in our internal policy relating to privacy.

In addition to our own personnel, other personnel from our service providers may process personal data on our behalf (for example, third party hosting companies; external software developers who assist us to further develop the Service).

How we protect the data

Data encryption
Secure hosting practices and resources provided by Microsoft Azure
Controls on access
Staff training and policies

Erasing Data

Data is deleted when requested by a registered user.



✓ Information about data processing clearly provided

Information about data collection and processing is outlined in GrowtheCode.org's Privacy Policy and GDPR policy in a 'concise, transparent, intelligible and easily accessible form, using clear and plain language'.

DATA SECURITY

✓ Data protection by design and default

Data protection, privacy and security are our highest priorities and are taken into account at all stages of development of our site and programs

GrowtheCode.org has an internal security, privacy and data protection policy in place for all staff.

✓ Encrypt, pseudonymise, or anonymise personal data wherever possible

Data is encrypted wherever feasible. Including protection of data while in transit over public networks in web applications and database systems.

✓ Create an internal security policy for team members and build awareness about data protection

Operational security includes:

Internal measures and policies that ensures that staff are knowledgeable about data security. Confidentiality agreements. Data is only accessible to staff that require access - technical employees. Password protected devices. Two factor authentication to access data.

Processes to notify authorities and data subjects in the event of a data breach

Policies to ensure that users affected are informed in case of a data breach.

ACCOUNTABILITY AND GOVERNANCE

GrowtheCode.org has a dedicated Data Security Officer that oversees all of GrowtheCode.org's security and compliance. For more information email privacy@growthecode.org.com

GrowtheCode.org is hosted by godaddy using AWS . AWS secures data uses various encryption methods, protocols, and algorithms, including double encryption. For data at rest, all data written to the Azure storage platform is encrypted through 256-bit AES encryption and is FIPS 140-2 compliant.

GDPR compliance, Data Protection and Security Officer

Smart Kids does not share personal data with third parties.

GrowtheCode.org's Data Protection Officer can be contacted via the contact link on our homepage or email: privacy@GrowtheCode.org.com



PRIVACY RIGHTS

We do not sell or pass on information to any third party that is not directly involved in running or hosting the website.

All of the information GrowtheCode.org holds on any user is available for them to see via their account at GrowtheCode.org.

Most data can be changed by the teacher or parent. For anything that can not be altered by the user, an email can be sent to privacy@GrowtheCode.org.com and we will investigate and change as required.

GrowtheCode.org has a deletion process in place. This will result in a complete deletion of all data.

- Users have the right to request and receive the information stored about them
- Users can update or correct information stored about them
- Users can request their data be deleted
- Users can request GrowtheCode.org to stop processing data about them
- Users can receive a copy of personal data stored about them
- Users can object to the processing of data
- Users rights are protected by GrowtheCode.org

