



PRIVACY & DATA PROTECTION

Privacy Notice

How ScrollSmarter uses and protects personal information

Last updated: 24 July 2026

Our approach to pupil information

ScrollSmarter does not currently ask schools to provide names, contact details or other information that identifies individual pupils. Any pupil feedback shared with us should be anonymous or aggregated. Schools should not send us special category information or safeguarding details.

1. Who we are

ScrollSmarter is a digital-wellbeing initiative and a trading name of FSHCREATIVE LIMITED. FSHCREATIVE LIMITED is the data controller for the personal information described in this notice.

FSHCREATIVE LIMITED is registered in England and Wales under company number 16711307. Its registered office is Brook House, Bluebridge Road, Hatfield, United Kingdom, AL9 7SX.

For questions about this notice or the way we use personal information, contact John Edwards at john@scrollsmarter.london or telephone 07973 395461.

2. What this notice covers

This notice explains how we use personal information when you:

- visit www.scrollsmarter.london;
- contact us or ask for information;
- receive a professional communication from us;
- represent a school or other organisation considering or taking part in a ScrollSmarter pilot; or
- give feedback about our materials or activities.

3. Personal information we collect

School and professional contacts

We may collect your name, job title, school or organisation, work email address, work telephone number, professional correspondence, meeting notes and your communication preferences.

Enquiries and working relationships

If you contact us, request materials or work with us on a pilot, we may keep the information you provide, records of our communications, arrangements for the work and feedback from adult school staff.

Website and technical information

Our website and service providers may process technical information such as IP address, browser and device information, security logs, pages visited and cookie choices. Where non-essential cookies are used, we will ask for consent before setting them.

Information about pupils

At this stage, ScrollSmarter does not need identifiable pupil information to review or pilot its materials. Schools should share pupil responses only in anonymous or aggregated form. We do not ask schools to send pupils' names, personal contact details, health information, special educational needs information, safeguarding information, photographs or identifiable free-text responses.

If we receive identifiable pupil information unexpectedly, we will limit access, contact the sender where appropriate, and securely delete or return it unless we have a legal reason to retain it. If a future ScrollSmarter service needs to process children's personal information, we will complete the necessary data-protection assessment and put appropriate notices, agreements and safeguards in place before collecting it.

4. How we obtain personal information

We obtain personal information:

- directly from you when you contact us, meet with us or provide feedback;
- from colleagues who introduce us or forward our information;
- from publicly available sources, including school websites, staff pages and professional directories; and
- automatically through our website and its security or analytics tools.

5. Why we use personal information and our lawful bases

Enquiries, materials and pilot relationships

We use personal information to answer enquiries, provide requested information, arrange conversations, manage pilot activity, gather adult professional feedback and improve ScrollSmarter. We rely on our legitimate interests in developing and operating ScrollSmarter and, where relevant, taking steps at your request before entering into a contract or performing a contract.

Professional outreach

We may contact school staff and other professional contacts about ScrollSmarter where we believe the initiative may be relevant to their role or organisation. We rely on our legitimate interests in introducing and developing ScrollSmarter, balanced against the rights and reasonable expectations of the people contacted.

Your right to object to direct marketing

You can ask us to stop sending professional outreach at any time. Reply to the email or contact john@scrollsmarter.london. We will stop the marketing and may retain a minimal suppression record so that we can respect your request.

Website operation and security

We use necessary technical information to operate, protect and improve our website and communications. We rely on our legitimate interests in maintaining secure and reliable services. We rely on consent for non-essential cookies or similar technologies where consent is required.

Legal and administrative purposes

We may use information to keep business records, obtain professional advice, establish or defend legal claims, prevent misuse and comply with legal or regulatory obligations. The lawful basis is our legitimate interests or compliance with a legal obligation, as applicable.

6. Who we share personal information with

We may share personal information, where necessary, with:

- providers that support our email, website hosting, cloud storage, IT, communications and administration;
- professional advisers such as accountants, insurers or legal advisers;
- schools and partner organisations where this is necessary for an agreed activity; and
- regulators, courts, law-enforcement bodies or other authorities where disclosure is required or permitted by law.

We require service providers to handle personal information securely and only for the agreed purposes. We do not sell or rent personal information.

7. International transfers

Some service providers may process personal information outside the United Kingdom. Where this happens, we take steps required by data-protection law, such as using an adequacy regulation or approved contractual safeguards, together with appropriate security measures.

8. How long we keep personal information

We keep personal information only for as long as it is needed for the purpose for which it was collected:

- routine enquiries and professional correspondence are normally kept for up to 24 months after the last meaningful contact;
- pilot and business relationship records are kept for the relationship and then for up to six years where needed for contractual, accounting or legal purposes;
- a minimal record of a marketing objection may be kept for as long as needed to ensure we do not contact you again;
- anonymous or aggregated feedback may be kept for longer because it is no longer personal information; and
- technical records and cookie information are kept in line with our service providers' settings and any cookie information shown on our website.

We may keep information for a shorter or longer period where the circumstances, a legal requirement or a dispute make that appropriate.

9. How we protect personal information

We use proportionate organisational and technical measures to protect personal information against loss, misuse, unauthorised access, alteration or disclosure. These include restricting access, using reputable service providers, maintaining secure accounts and reviewing what information we need to retain.

10. Your data-protection rights

Depending on the circumstances, you may have the right to:

- ask for a copy of your personal information;
- ask us to correct inaccurate or incomplete information;
- ask us to erase personal information;
- ask us to restrict the way we use personal information;
- object to processing based on legitimate interests;
- object at any time to direct marketing;
- ask for certain information in a portable form; and
- withdraw consent at any time where we rely on consent.

These rights are not all absolute and may not apply in every situation. To exercise a right, contact john@scrollsmarter.london. We may need to confirm your identity before acting on a request.

We do not use personal information for solely automated decisions that produce legal or similarly significant effects.

11. Complaints

Please contact us first if you have a concern, so that we can try to resolve it. You also have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection.

ICO website: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

ICO telephone: 0303 123 1113

12. Changes to this notice

We may update this notice when our services, suppliers or use of personal information change. The latest version will be published at www.scrollsmarter.london with its updated date.

Contact details

ScrollSmarter

A trading name of FSHCREATIVE LIMITED

Company number: 16711307

Registered office: Brook House, Bluebridge Road, Hatfield, United Kingdom, AL9 7SX

Email: john@scrollsmarter.london

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Website: www.scrollsmarter.london