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 lettersandsoundsphonics.com and GrowtheCode.org websites. 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

Letters and Sounds Phonics Accounts

Data   First name, surname, 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.

✔ **Legal justification for processing of data**

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✔ **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.

✔ **Data protection impact assessments**

GrowtheCode.org has successfully taken part in the National Education Risk Assessment.
The assessment measured technical and business processes regarding data security and privacy.

✔ **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 on Microsoft Azure Services,one of the largest hosting companies in the world and are certified compliant with a wide range of security and data protection standards. Microsoft Azure 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

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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

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