Whizz Education Data Protection Policy

Introduction

Whizz Education Limited (**Whizz Education** or the **Company**) routinely collects and uses personal and sensitive information about its current, prospective and former student users; their parents or guardians and the teachers in their schools; its current, prospective and former staff; its suppliers and contractors; and other individuals connected to Whizz Education as part of its everyday operations. This information is referred to in **the UK General Data Protection Regulation (as incorporated into UK law by the Data Protection Act 2018) ("UK GDPR")** and the **EU Regulation 2016/679 General Data Protection Regulation ("EU GDPR") as 'Personal Data'. Terms defined in the UK GDPR and EU GDPR have the same meaning in this policy.**

This personal data is gathered in order to enable:

(a) the Company's provision of personalised online education, and reports concerning student usage of Maths-Whizz and progress made,
(b) the Company to improve its products, services and systems, and
(c) the Company to market its products and services to parents and teachers.

In addition, the Company may be required by law to collect, use and share certain information.

This policy sets out the basis on which Whizz processes personal data, securely and in accordance with applicable law, including not only the UK GDPR, and the EU GDPR, but also the principal laws and regulations in all the major countries and states within countries where the Company supplies its services. In the US this includes FERPA, PPRA, COPPA and other applicable statutes as may be amended from time to time.

References in this Policy to the UK GDPR and EU GDPR include equivalent data protection concepts under other applicable data protection laws where Whizz Education operates.

This policy applies to all personal data however it is collected, used, recorded, stored and disposed of, both on paper and electronically.

Whizz Education as Data Controller

Whizz Education is registered with the UK Information Commissioner's Office, Registration Number Z8747153. It is the specific policy of Whizz Education to:

- take all appropriate and reasonable steps to ensure that the rights of Whizz Education's customers, pupils, parents and guardians, teachers, employees, suppliers, and contractors ("Data Subjects") with respect to their personal data are protected;
- take all reasonable steps to ensure that personal data held by Whizz Education in relation to a Data Subject is both accurate and secure; and
- comply with the UK GDPR, the EU GDPR and other laws and regulations as above.

For the purposes of all such laws and regulations, Whizz usually acts as a Data Controller of all personal data that is held about the Data Subjects. In some cases, there will be additional Data Controllers in respect of that personal Data (such as the schools who engage Whizz Education). In accordance with the UK GDPR, Ray Douse has been appointed the Data Protection Officer of Whizz Education. Ray is responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other data protection-related policies, and with the UK GDPR, the EU GDPR and other applicable data protection legislation.

In certain territories, Whizz Education may work with authorised business partners, including agents and resellers. Depending on the circumstances and applicable contractual arrangements, such partners may act as data processors on behalf of Whizz Education or as independent data controllers in respect of personal data processed in connection with the Maths-Whizz services. Whizz Education ensures that appropriate contractual and data protection safeguards are in place with all such partners.

Whizz Education is also committed to ensuring that all its employees are aware of our data protection policy and of legal requirements concerning data protection, and that adequate training is provided to them to ensure that our policy is put into practice at all times. The requirements of this policy are mandatory for all staff employed by Whizz and any third party contracted to provide services for Whizz Education. This policy will be published both externally on the website, as well as internally.

Whizz Education takes its responsibilities as a Data Controller seriously and is committed to using the personal data it holds only in accordance with the law. This policy provides detailed information about how Whizz processes personal data. If you have questions regarding your personal data or its use, please contact Ray Douse at dpo@whizz.com.

UK GDPR and EU GDPR Data Protection Principles

The UK GDPR and the EU GDPR Data Protection Principles require Whizz Education to ensure that personal data is:

1. fairly and lawfully processed in a manner that is transparent to individuals;
2. processed for one or more specified, explicit and legitimate purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date;
5. not kept for longer than is necessary;
6. processed in a manner that ensures appropriate security of the personal data.

In addition, the UK GDPR requires Whizz Education to ensure that personal data is:

1. processed in accordance with the rights of the data subject; and
2. not transferred to a country outside the UK without an adequate level of data protection.

Whizz Education is fully committed to upholding these principles and requirements as the cornerstone of our Data Protection Policy.

Personal Data Processed by Whizz Education

Personal data processed by Whizz Education can take different forms – it may be factual information (such as names, ages and home addresses), expressions of opinion about a data subject, images of or including data subjects or other recorded information which identifies or relates to a living individual.

Personal data concerning employees and contractors always includes a data subject's contact details and additional information required in connection with the operation of their employment contract or appointment but may also include information arising during the course of their employment with the Company which is relevant to their career development.

Personal data concerning student users of the Company's services is usually limited to their names, dates of birth, gender and the school class to which they belong but may include other educational classifications used in consolidated results analysis, and will include statistics concerning their usage of Maths-Whizz and the results achieved in each individual Maths-Whizz exercise which they attempt. Further, it may include sensitive personal data such as data concerning the racial or ethnic background and their health.

Personal data concerning parents and/or guardians is limited to names, addresses, gender, email contact details and financial information relating to their method of payment.

Personal data concerning teachers is restricted to their names, titles and email contact details.

The processing of personal data may include obtaining, recording, holding, disclosing, anonymising, destroying or otherwise using that data. As part of Whizz Education's operations, it is required to process a wide range of personal data.

Sensitive personal data is processed only where necessary for the provision of education and educational support and ancillary services to a student or for a person's employment.

Whizz Education collects the personal data it processes directly from the data subject (or in the case of a student, their school, parents or guardians) and from third parties (for example, employment referees, agencies and the Disclosure and Barring Service).

Lawful Basis for Processing Personal Data

Whizz Education has determined that its lawful basis for processing personal data concerning students is (a) the performance of its contracts with individuals and schools as regards the provision of its services; and/or (b) its legitimate interest in operating and developing the Math(s)-Whizz Tutor for the benefit of such students, their teachers and their parents or guardians. Whizz Education has undertaken a Legitimate Interests Assessment which has taken into account the necessity of collecting and processing student personal data and has evaluated the interests, fundamental rights and freedoms of the students in the context of their use of the Math(s)-Whizz Tutor. Far from being overridden, it believes the students' interests are fully aligned with Whizz Education's interests. Furthermore, Whizz Education does not believe that use of the Math(s)-Whizz Tutor creates any risks to the individual's rights and freedoms, the most usual result of helping children to improve their maths being raised self-confidence and self-esteem.

The lawful basis for Whizz Education to process personal data concerning parents, teachers and employees is normally contractual necessity meaning that our contracts with parents concerning home subscriptions, with schools concerning school subscriptions and with employees with respect to their employment could not be performed without the personal data we collect and process on behalf of the Data Subjects associated with those contracts. However, legitimate interests also apply with respect to some of the data. Further, Whizz Education may be required to process such personal data in order to comply with legal obligations (such as those imposed on it by Her Majesty's Revenue and Customs).

Whizz Education will only process personal data for the purpose(s) for which it was originally collected (or for purpose(s) which have subsequently been notified to the Data Subject) or otherwise in a manner that is consistent with this Policy (such as processing as required by law or anonymising personal data). Whizz will not process it for any other purpose without the Data Subject's permission, unless it is permitted to do so under the UK GDPR or is required by law to do so.

Sensitive Personal Data

The only sensitive personal data Whizz Education may, from time to time, process is information as to racial or ethnic origin of students and/or information regarding the health status of students.

Such sensitive personal data will be processed only in the context of statistical analysis of student performance using the Maths-Whizz Tutor. Such data is processed only where strictly necessary, is not used to make decisions about individual students, and is analysed in aggregated form wherever possible.

Keeping Data Subjects Informed

Whizz Education keeps the Data Subjects, concerning whom it holds Personal Data, informed about this Data Protection Policy by the issue to them and publication on its website of Privacy Statements. Separate Privacy Statements are available for:

- Maths-Whizz Students
- Home Subscribers and Parents/Guardians of School Subscribers to Maths-Whizz
- Teachers and Staff in Maths-Whizz Schools
- Employees of Whizz Education
- Next of kin of employees

These Privacy Statements comply with the requirements of the UK GDPR and the EU GDPR.

Data Subject Access

It is Whizz Education's policy that Data Subjects may make subject access requests ("SARs") at any time to find out more about the Personal Data which Whizz Education holds about them, what it is doing with that Personal Data, and why.

SARs may concern:

- The right to find out what Personal Data about the Data Subject we hold
- The right to have Whizz Education correct any incorrect or incomplete Personal Data about the Data Subject
- The right, in some circumstances, to ask Whizz Education to delete Personal Data about the Data Subject
- The right, in some circumstances, to ask Whizz Education to stop processing Personal Data about the Data Subject
- The right for some Data Subjects to data portability in respect of Personal Data about the Data Subject
- The right, in some circumstances, to object to Whizz Education processing Personal Data about the Data Subject

Save where required to do so by law, Whizz Education will not delete Personal Data that is required to maintain our business purpose or that is required to facilitate use of Maths-Whizz.

Any of Data Subjects wishing to make a SAR should do using a Subject Access Request Form, sending the form to the Company's Data Protection Officer at dpo@whizz.com. With effect from 1st January, 2021, Data Subjects in the European Economic Area may communicate with our EU Data Representative, Ms Asem Koshkarbayeva, at asem.koshkarbayeva@whizz.com.

Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the Data Subject shall be informed.

All SARs received shall be handled by the Company's Data Protection Officer.

Whizz Education will not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a Data Subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

Data Retention Policy

Whizz Education's Data Retention Policy shall be not to keep Personal Data for any longer than is necessary in light of the purpose or purposes for which that Personal Data was originally collected, held, and processed. Of course, this must be subject to the Company's legal obligations.

When Personal Data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

Our Privacy Statements set out the retention periods we apply to specific Personal Data types.
With respect to Personal Data concerning Maths-Whizz Students, our standard policy will be to anonymise student lesson histories within a period of one year after a student's subscription comes to an end but we will do so within 60 days upon a customer's request.

Data Security - Transferring Personal Data and Communications

Whizz Education provides a means by which schools can upload Personal Data of students to our website. Where schools do not wish to use this facility, we shall ask the schools to transfer the data to us using a secure file transfer service.
Whizz Education shall seek to ensure that the following measures are taken with respect to all other communications and transfers involving Personal Data:

- In order to share any Personal Data, we must confirm the identity of the requestor.
- When communicating by email, we shall try to avoid including Personal Data in the body of the email rather placing such Personal Data in a password protected attachment. Personal Data that is contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted.
- Where Personal Data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data; and
- Where Personal Data is to be transferred in hardcopy form it should be passed directly to the recipient.

Data Security -International Transfers of Personal Data

Whizz Education operates internationally and uses trusted service providers located in a number of countries. As a result, Personal Data may be transferred to, processed in, or accessed from countries outside the United Kingdom or the European Economic Area ("EEA").
Where such transfers take place, Whizz Education ensures that appropriate safeguards are in place in accordance with applicable Data Protection Legislation. These safeguards may include:

- transfers to countries or territories recognised as providing an adequate level of protection;
- the use of standard contractual clauses or other approved contractual safeguards; and
- reliance on recognised international data transfer frameworks where applicable.

Where Personal Data is transferred to the United States, such transfers may be made pursuant to the UK Extension to the EU–US Data Privacy Framework (adopted October 2023), where applicable, or alternative lawful transfer mechanisms as required.

Whizz Education regularly reviews its international data transfer arrangements to ensure continued compliance with applicable Data Protection Legislation.

Data Security – Storage and Access

Whizz Education shall seek to ensure that the following measures are taken with respect to the storage of and access to Personal Data:

- Access to stored Personal Data will be restricted to as few employees as possible;
- The data accessible shall be as little as necessary;
- All access to such data shall be as secure as reasonably possible by identifying the individual by reference to a password, device and location, using two-step authentication;
- Only company-owned devices or personal devices which have been registered with Whizz Education IT and which have undergone a basic security/safety review may be used to access Personal Data.
- All hardcopies of Personal Data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

- All Personal Data stored electronically will be backed up with backups stored offsite;
- No Personal Data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise; and
- No Personal Data should be transferred to any device personally belonging to an employee unless registered and security-checked as above and Personal Data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the UK GDPR and has signed a Data Processing Agreement.

Whizz Education engages a limited number of trusted third-party service providers ("sub-processors") to support the delivery, security, analytics, and operation of the Maths-Whizz services. All sub-processors are subject to appropriate contractual obligations, including confidentiality, security, and data protection requirements consistent with this Policy and applicable Data Protection Legislation.

Data Security – Disposal

When any Personal Data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of.

Data Security - Use of Personal Data

Whizz Education shall seek to ensure that the following measures are taken with respect to the use of Personal Data:

- No Personal Data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any Personal Data that they do not already have access to, such access should be formally requested from the Data Protection Officer;
- No Personal Data may be transferred to any non-authorised employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the Data Protection Officer;
- Personal Data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;
- If Personal Data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
- Where Personal Data held by the Company is used for marketing purposes, it shall be the responsibility of the Company's Marketing Manager to ensure that the appropriate consent is obtained and that no Data Subjects have opted out, whether directly or via a third-party service such as the TPS.

Data Security - IT Security

Whizz Education is committed to ensuring that the following measures are taken with respect to IT and information security:

- All passwords should contain a combination of uppercase and lowercase letters, numbers, and symbols, and not use words or phrases that can be easily guessed or otherwise compromised;
- Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- All passwords to Company systems containing Personal Data are protected and managed by an industry standard password management system, currently BitWarden:
- All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. The Company's IT staff shall be responsible for installing any and all security-related updates as soon as reasonably and practically possible, unless there are valid technical reasons not to do so.

Organisational Measures

Whizz Education shall seek to ensure that the following measures are taken with respect to the collection, holding, and processing of Personal Data:

- All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the UK GDPR and under this Policy, and shall be provided with a copy of this Policy;
- Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, Personal Data in order to carry out their assigned duties correctly shall have access to Personal Data held by the Company;
- All employees, agents, contractors, or other parties working on behalf of the Company handling Personal Data will be appropriately trained to do so;
- All employees, agents, contractors, or other parties working on behalf of the Company handling Personal Data will be appropriately supervised;
- All employees, agents, contractors, or other parties working on behalf of the Company handling Personal Data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to Personal Data, whether in the workplace or otherwise;
- Methods of collecting, holding, and processing Personal Data shall be regularly evaluated and reviewed;
- The need to retain Personal Data held by the Company shall be reviewed periodically;
- The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling Personal Data shall be regularly evaluated and reviewed;
- All employees, agents, contractors, or other parties working on behalf of the Company handling Personal Data will be bound to do so in accordance with the principles of the UK GDPR and this Policy by contract;
- All agents, contractors, or other parties working on behalf of the Company handling Personal Data must ensure that any and all of their employees who are involved in the processing of Personal Data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the UK GDPR; and
- Where any agent, contractor or other party working on behalf of the Company handling Personal Data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

Third Party Data Processors and International Processing

Whizz Education engages a limited number of trusted third-party service providers ("sub-processors") to support the hosting, operation, security, analytics, and support of the Maths-Whizz services. Some of these sub-processors are located outside the United Kingdom or the European Economic Area.
Whizz Education ensures that all sub-processors are subject to appropriate contractual obligations, including confidentiality, security, and data protection requirements consistent with this Policy and applicable Data Protection Legislation.
Personal Data is transferred to sub-processors outside the UK or EEA only where appropriate safeguards are in place, such as adequacy decisions, standard contractual clauses, recognised international data transfer frameworks, or other lawful transfer mechanisms permitted under applicable Data Protection Legislation.
Whizz Education does not transfer Personal Data to third parties that do not provide appropriate assurances regarding the protection of such data.

Data Breach Notification

All Personal Data breaches must be reported immediately to the Data Protection Officer.

If a Personal Data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Data Subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's

Office (and, where required, any other applicable supervisory or regulatory authority) is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

If a Personal Data breach is likely to result in a high risk (that is, a higher risk than that described in the previous paragraph above) to the rights and freedoms of Data Subjects, the Data Protection Officer must ensure that all affected Data Subjects are informed of the breach directly and without undue delay.

Data breach notifications shall include the following information:

- The categories and approximate number of Data Subjects concerned;
- The categories and approximate number of Personal Data records concerned;
- The name and contact details of the Company's Data Protection Officer (or other contact point where more information can be obtained);
- The likely consequences of the breach;
- Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects

Implementation of Policy

This Policy shall be deemed effective as of 28th January, 2026.
This Policy shall be reassessed every 12 months.

This Policy has been approved and authorised by:

Name:	Raymond Douse
Position:	Data Protection Officer
Due for Review by:	1st February, 2027