

Effective date: 1<sup>st</sup> March 2020

## **Privacy Notice**

This is the privacy notice of ExamRevision. In this document, "we", "our", or "us" refer to ExamRevision.

### **Introduction**

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

**1. Information we process because we have a contractual obligation with you**

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- a) verify your identity for security purposes
- b) sell products to you
- c) provide you with our services
- d) provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

**2. Information we process:**

**(a) Information You Provide to Us**

In order to use our services you need to provide us with the following information, which we will process:

- Name- Along with additional information, used to identify an account for support purposes. Also used to make the account more personal. Also used to allow permitted teachers to view report of account activity.
- Email- Used to allow access to the unique account. Also used to identify an account for support purposes, such as forgotten passwords or technical difficulties such as issues with access to videos. For teachers, can be used to identify account that needs access to student account activity (such as log-ins, video views etc.)
- Password- to secure your account.
- School- Used to group students on our database.
- Year/Teaching Subjects- Used as an indicator of what courses a student/teacher requires.
- How you found ExamRevision- Used to identify/review marketing strategies.

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By means of using our website, a student will provide us with data on:

- Completed quizzes and results
- Videos watched
- Reflection log
- Last log in time and duration

All of the above allows us to track how a student is engaging with our website and to evaluate if progress is being made by the student.

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be personal information.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [examrevisionoffice@gmail.com](mailto:examrevisionoffice@gmail.com). However, if you do so, you may not be able to use our website or our services further.

### **3. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- a) whether the same objective could be achieved through other means
- b) whether processing (or not processing) might cause you harm
- c) whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- a) record-keeping for the proper and necessary administration of our business.
- b) responding to unsolicited communication from you to which we believe you would expect a response
- c) protecting and asserting the legal rights of any party

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- d) insuring against or obtaining professional advice that is required to manage business risk
- e) protecting your interests where we believe we have a duty to do so.

#### **4. Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

#### **Specific uses of information you provide to us**

#### **5. We may use information that we collect about you for the following reason:**

- Providing of service: We will use your personal information in order to provide our services.
- Customer Support: We will also use your information to respond to your questions or comments.
- Administrative: We may contact you to inform you about changes in our services, our service offering and other important service related notices, such as changes to the Policy or about security or fraud notices.
- Marketing: If you explicitly opt-in to our direct marketing on registration we will send you marketing material such as discounts, special offers, useful study tips etc by email. If you have did not explicitly opt-in you will not receive such communication.
- Legal Compliance: We may use your information to comply with applicable legal or regulatory obligations, including informal requests from law enforcement or other governmental authorities.
- Review and Improvement: of the information provided on our Website to ensure that the Website is user friendly and to prevent any potential disruptions or cyber attacks.

#### **6. Information provided on the understanding that it will be shared with a third party**

By linking a student account with a teacher account, you are agreeing to your data being shared with any linked teacher accounts. The following information will be tracked:

- Completed quizzes and results
- Videos watched
- Reflection log
- Last log in time and duration

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Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

If you wish an account to be unlinked, please contact us at [examrevisionoffice@gmail.com](mailto:examrevisionoffice@gmail.com).

## **7. Complaints regarding content on our website**

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

## **8. Information relating to your method of payment**

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of Stripe. That page may be branded to look like a page on our website, but it is not controlled by us.

## **9. Job application and employment**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

## **10. Sending a message to our support team**

When you contact us, through our website, social media or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business. We keep personally identifiable information associated with your message, such as your name

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and email address so as to be able to track our communications with you to provide a high quality service.

## **11. Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **Use of information we collect through automated systems when you visit our website**

Like many websites, we and our service providers use cookies, web beacons and other technologies to receive and store certain types of information when you interact with us through your computer or mobile device. Using these technologies helps us customize your experience with our Services, improve your experience, and tailor marketing messages.

## **12. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

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### **13. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **Disclosure and sharing of your information**

### **14. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

We do share your personal information only in limited cases in order to facilitate our service:

- Payments
- Marketing
- Third party agents and contractors for the purposes of providing services to us (for example, ExamRevision's accountants, professional advisors, IT and communications providers etc.)
- The extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation

### **15. Third party advertising on our website**

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

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## **Access to your own information**

### **16. Access to your personal information**

- a. At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.
- b. To obtain a copy of any information that is not provided on our website you may send us a request at [examrevisionoffice@gmail.com](mailto:examrevisionoffice@gmail.com).
- c. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### **17. Removal of your information**

If you wish us to remove personally identifiable information from our website, you may contact us at [email address].

This may limit the service we can provide to you.

### **18. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

### **19. How you can complain**

- a. If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is [examrevisionoffice@gmail.com](mailto:examrevisionoffice@gmail.com).
- b. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- c. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Data Protection Commissioner. This can be done at <https://www.dataprotection.ie/docs/complaints/1592.htm>

### **20. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:



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- a. to provide you with the services you have requested/while your account is active plus time for negotiation of renewal.
- b. to comply with other law, including for the period demanded by our tax authorities;
- c. to support a claim or defence in court.

## **21. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **22. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. We advise you to periodically check our privacy policy so you are aware of how ExamRevision is processing your data. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.