



# Privacy Policy

*Updated: 17th April 2018*

## 1. Scope

At Wonde, we take privacy very seriously. We've updated our privacy policy (**Policy**) to ensure that we communicate to You, in the clearest way possible, how we treat personal information. We encourage You to read this Policy carefully. It will help You make informed decisions about sharing Your personal information with us. All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Wonde

Wonde is a provider of online platforms and APIs which are simple, smart, and secure and gives schools, individuals and business owners more control and visibility of their own data and provides additional tools.

The Service involves the storage of Data about schools, companies or individuals. That Data can include personal information. "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address and what school they're attached to.

Wonde may collect personal information directly from You when You:

- register to use the Service,
- use the Service,
- have your data in a school's Management Information System,
- are included in a school integration,
- contact the Wonde support team, and
- visit our Website.

You can always choose not to provide Your personal information to Wonde, but it may mean that we are unable to provide You with the Service.

## 3. Responsibility

- 3.1. The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to Wonde Ltd collecting/processing their personal data.
- 3.2. All Employees of Wonde Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 4. Privacy notice

### 4.1. Who are we?

Wonde are a company that helps schools better manage and securely control their data with third party applications, and allows third party applications to access school data upon agreement of the school and the terms of their agreements.

Our DPO and data protection representatives can be contacted directly here:

- Email: [dpo@wonde.com](mailto:dpo@wonde.com)
- Tel: 01638 779 144

The type of data we collect from you includes:

Personal Data Type	Source
First name	Sign-up page/School MIS
Last name	Sign-up page/School MIS
Email address	Sign-up page/School MIS

The personal data we collect will be used for the following purposes:

- Allowing you to access Wonde
- Allowing you to access software purchased directly or by the school

Our legal basis for processing for the personal data include 'consent' (the individual has given clear consent for you to process their personal data for a specific purpose) and 'contract' (the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract).

### 4.2. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for Wonde Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time.

### **4.3. Retention period**

Wonde Ltd will process personal data for as long as required by schools, their approved third parties and any direct services provided to individuals. Wonde will only store the personal data for the retention period in line with the requirements of the GDPR.

### **4.4. Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

### **4.5. Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Wonde Ltd (or third parties as described), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Wonde Ltd's data protection DPO.

## 5. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

*“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.*

### How we use your information

This privacy notice tells you how we, Wonde Ltd, will collect and use your personal data for [outline further information on services and activities that you collect personal data, for example: cookies, profiling, complaints, subscriptions, etc.]]

### Why does Wonde Ltd need to collect and store personal data?

Wonde collects Your personal information so that we can provide You with the Service and any related services You may request. In doing so, Wonde may use the personal information we have collected from You for purposes related to the Services including to:

- verify Your identity,
- administer the Service,
- notify You of new or changed services offered in relation to the Service,
- carry out marketing or training relating to the Service,
- assist with the resolution of technical support issues or other issues relating to the Service,
- comply with laws and regulations in applicable jurisdictions, and
- communicate with You.

By using the Service, You consent to Your personal information being collected, held and used in this way and for any other use You authorise. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

### Will Wonde Ltd share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Wonde Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf or on behalf of a school. When they no longer need your data to fulfil this service, they will dispose of the details in line with Wonde Ltd's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

**How will Wonde Ltd use the personal data it collects about me?**

Wonde Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Wonde Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

**Under what circumstances will Wonde Ltd contact me?**

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

**Wonde can aggregate Your non-personally identifiable data**

By using the Service, You agree that Wonde can access, aggregate and use non-personally identifiable data Wonde has collected from You. This data will in no way identify You or any other individual.

Wonde may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Service,
- provide our customers with further information regarding the uses and benefits of the Service,
- enhance school productivity, including by creating useful school insights from that aggregated data and allowing You to benchmark Your schools performance against that aggregated data, and
- otherwise to improve the Service.

**Can I find out the personal data that the organisation holds about me?**

Wonde Ltd at your request, can confirm what information we hold about you and how it is processed. If Wonde Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Wonde Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.

- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

**What forms of ID will I need to provide in order to access this?**

Wonde Ltd accepts the following forms of ID when information on your personal data is requested:

- Passport
- Driving licence
- Birth certificate