

THIRD SPACE LEARNING PRIVACY AND COOKIES POLICY

Introduction

This is the privacy and cookies policy for www.ThirdSpaceLearning.com (Website). The Website is operated by Virtual Class Limited (trading as Third Space Learning) whose registered office address is at 32-38 Leman St, London, E1 8EW, with registered company number 08260115 (Third Space Learning, we, us and our).

At Third Space Learning, we are very conscious about protecting the safety of the students and other users that we support and are aware that online learning, and the 1-to-1 support that online learning facilitates, demands that we are rigorous in terms of how we vet our tutors, and how we protect personal data.

This privacy and policy explains why and how we collect information, what we do with it and what controls you have over your information. Please read this privacy policy carefully (in particular in relation to our use of Sensitive Personal Data) and contact us if you have any comments, concerns or queries. Please do rest assured that our motivation in collecting and processing personal data is driven by our desire to ensure the security of our users and the quality of their experience.

We reserve the right to change this privacy policy from time to time by changing it on the Website. This privacy policy was last updated on 18 August 2017. Your continued use of the Website and/or continued provision of Personal Information to us will be subject to the terms of the then-current Privacy Policy

Personal Information we may collect

a) Teacher Information

When as a teacher you visit the Website or use our Service, we request that you provide Personal Information about yourself, this refers to any information that you voluntarily submit to us and that identifies you personally, including contact information and information about yourself or your business, such as: name, email, address, school, teaching position. Personal Information can also include information about any transactions (including free transactions) that you enter into on the Website, and information about you that is available on the internet, or publicly available information that we acquire from service providers.

We may also collect and process the following Personal Information:

Information (such as name, email address, school, teaching position and information relating to your students such as name, age, gender and academic school year) which may be provided by completing forms on the Website, including if you register as a user of the Website, upload or submit any material via the Website, or request any information from us;

- in connection with an account sign-in facility, your log-in and password details;
- details of any online class (“Sessions”) booking requests made by you through the Website for students;
- communications you send to us, for example to report a problem or to submit queries, concerns or comments regarding the Website or its content;
- information from surveys and/or promotions that we may, from time to time, run on the Website, if you choose to respond to, or participate in, them;
- if you register as a user of the Website, upload or submit any material via the Website or request any information from us;

b) Student Information

We also ask you to provide information relating to those of your students who will use our Service (such as name, age, gender, academic school year and any relevant medical or learning needs*) when completing forms on the Website, or as a registered user you upload or submit via the Website; including:

- information that you post in the form of comments relating to student’s academic capabilities to tutors in advance of a student attending a Session. This information allows our tutors to provide students with tailored Sessions suited to a student’s particular educational needs; and
- details of any online class (“Sessions”) booking requests made by you through the Website for students;

*This is “sensitive” personal data, as defined in the Data Protection Act 1998 (“DPA”). Please see the section on Sensitive Personal Data below for information on how we treat this data.

We collect information about students when attending a Session. This includes:

- recordings of the Sessions (onscreen interaction and live conversations between students and the tutors) during Sessions. This provides students with a library of

their sessions to support future learning, whilst giving teachers transparency on all 1-to-1 support. It also allows us to monitor quality, provides us with an important tool for on-going Continuing Professional Development for our tutors, and enables us to improve the Service and enhance educational outcomes;

- our tutor's record of students' performance and progress.

Information collected from students

If you are a student, you may only use this Website and provide personal information if you are authorised and supervised by your teacher and/or your parent or guardian to do so.

We will limit the amount of information we collect about students (in addition to the information already provided to us by a student's teacher) to no more than is necessary for the specified activity. This may include recording the Sessions attended by students to monitor training standards, quality and compliance by tutors with Third Space Learning' guidelines, for tracking and monitoring student performance in order to provide feedback on student progression to schools and to understand how we can improve the service.

Navigational Information we may collect from you

We may also collect and process navigational information. This refers to information about your computer and your visits to this website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed.

Uses made of information

We use the information we collect only in compliance with this Privacy Policy. We will use the Personal Information that we receive to:

- identify you when you sign-in to your account;
- enable us to process your Session booking requests and to provide you with the services and information offered through the Website and which you request;
- administer your account with us;
- tailor Sessions to suit student's educational needs;
- provide feedback to schools on student performance during Sessions to allow schools to monitor and track progression performance;
- establish whether Sessions have been attended as required by students;
- ensure we have the requisite basis for processing personal data of students;

- analyse the use of the Website and the people visiting in order to improve our content and services;
- conduct analysis and research into Sessions and outcomes including training delivery and student performance to generally enhance how we deliver our Service.
- aggregate and anonymize data on the performance of students, allowing us to track standards and performance development across different age groups, geographies and other categories of student. We may collate and use such aggregated data to improve the Service for all students. No student will be identifiable directly or indirectly from the aggregated data.
- send you information we think you may find useful or which you have requested from us, including receipt of marketing communications such as our periodic newsletter provided you have indicated that you are happy to be contacted for these purposes;

We use Navigational Information to operate and improve the Website and the Service. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalised information about Third Space Learning and content tailored to your use of the service.

We will never sell Personal Information of teachers or students to any third party.

To Unsubscribe from our communications

You can tell us not to contact you with information regarding our products and services, either at the point such information is collected on the Website or, where you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the contacting us details at the end of this privacy policy.

Information sharing

We do not, as a matter of course, make identifying information of teachers or students available to anyone within or outside Third Space Learning, although there are specific circumstances where we may disclose personal information (including sensitive personal data) in the context of delivering, managing and improving the Service. In particular to:

- our tutors, only in the context of academic requirements directed to them by a students' teacher and when attending Sessions with students at the their teachers direction;
- any of our academic partners, suppliers or contractors for the purposes of providing tutors to us and in connection with the provision of our Services;
- to our agents or contractors who assist us in providing, supporting and improving the Services including, processing transactions, fulfilling requests for information, receiving and sending communications, updating communication preferences, analysis of training data, undertaking research or in other tasks from time to time. We put measures in place to try to ensure that our agents and contractors only use your information to the extent necessary to perform their functions, and that processing of your personal information is subject to physical, technical and organisational measures (including data minimisation techniques and wherever possible pseudonymisation and/or encryption) to seek to limit personal identities from being derived by such partners from this data and to safeguard and maintain the confidentiality of your information.

In the event that we undergo re-organisation or are sold to a third party, you agree that any personal information we hold about you may be transferred to that re-organised entity or third party.

We may disclose your personal information if legally entitled or required to do so (for example if required by law or by a Court order or if we believe that such action is necessary to prevent fraud or cyber crime or to protect the Website or the rights, property or personal safety of any person).

Sensitive Personal Data

Some of the personal data processed by us may be classified as "sensitive" under the Data Protections Act 1998. This may include racial or ethnic origin and any medical or learning needs that are declared to us by teachers, parents or students.

If you disclose sensitive personal information to us, we will use that information for the purpose(s) given to you at the time the information was collected. We will also collect and use sensitive personal information where there is a legal basis to do so without your consent (such as for protection of your or another's vital interests or to comply with court or law enforcement orders compelling disclosure).

We may use information you provide to us relating to a medical or learning needs of a student for the purposes of providing that student with tailored Sessions suited to their particular educational needs, including to decide if any additional support may be required by the student, and to share this information with:

- our employees;
- tutors and third party academic partners who are directly involved in the provision of Sessions and our services to those students;
- other suppliers and contractors who are involved in the provision of our services;
- back-up storage providers who we have engaged.

We will only share sensitive personal data with other third parties without your consent if we have a legal basis to do so.

Other disclosures of sensitive personal data without your consent will be rare and include circumstances where it is vital to protect the interests of you, students or others (for example, where you or another person is perceived to be at significant risk, particularly in the case of children), it is necessary for the prevention of fraud or the exercise of legal rights or if we are under a legal obligation.

Tutor vetting

Tutors are provided to us by our academic partners and contractors. All tutors are required to go through our rigorous training and vetting processes (developed in conjunction with the Institute of Education).

As a part of our training and vetting process, we have taken steps to ensure that:

- Police Clearance Certificates and security certificates for the country within which tutors are located are obtained for all tutors as well as any necessary and relevant degree certification;
- English for Speakers of Other Languages (“ESOL”) courses and accompanying certification is obtained for all tutors;
- tutors operate under the management of Third Space Learning’s academic and operational staff. All tutors must demonstrate to our satisfaction that they meet and comply with our stringent academic standards and requirements before we allow them to teach any Sessions. We frequently carry out audit checks on tutors to

ensure the continuing compliance of tutors with our academic standards and requirements;

- tutors have no access to student data other than academic requirements directed by the students' teacher;
- students are only permitted to deal with tutors when directed to attend sessions by their teachers. Students may not book Sessions or gain any other access rights in respect of the services themselves.

Additional information

When you visit the Website, we may automatically collect additional information about you, such as the type of internet browser or mobile device you use, any website from which you have come to the Website and your IP address (the unique address which identifies your device on the internet) and your operating system, which are automatically recognised by our web server. This information is used to assist us in providing an effective service on the Website to collect broad demographic information for aggregate use.

Cookies and similar technology

The Website also uses cookies or similar technology to collect information about your access to the Website.

Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you. Cookies are uniquely assigned to you, and can only be read by a Web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the Website and will last for longer. Cookies are not used to run programs or deliver viruses to your computer.

We use cookies to:

- remember that you have used the Website before. This means we can identify the number of unique visitors we receive and allows us to make sure that we have enough capacity for the number of users we get;
- allow you to navigate the Website more quickly and easily;

- remember your login session so you can move from one page to another within the Website;
- store your preferences;
- customise elements of the layout and/or content of the pages of the Website for you;
- collect statistical information about how you use the Website so that we can improve the Website

Some of the cookies used on our Website are set by us and some are set by third parties who are delivering services on our behalf

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting www.allaboutcookies.org which includes additional useful information on cookies and how to block cookies using different types of browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the Website (as the case may be).

We also sometimes use third party analytics tools which may introduce web beacons. These help us better manage our Website and Service, informing us what content is effective by monitoring users on their journey around our site. These tools may also be used in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. We may tie the information gathered by clear gifs in emails to our customers' Personal Information

Third Party Tracking Technologies

We monitor users on their journey around our site. We sometimes use third party analytics tools which may introduce web beacons. This is to enable us to further improve your use and the functionality of our Website.

External links

The Website may, from time to time, contain links to external Websites. Our provision of such links does not constitute our endorsement of these other websites. We do not control, and are not responsible for, the privacy policies, the content or the practices of such

Websites. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

Security

We place great importance on the security of all personally identifiable information associated with our users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and we secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure so that only authorised personnel have access to personal information. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via the Website whilst it is in transit over the internet and any such submission is at your own risk.

It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal information if you use a shared computer or a computer in a public place.

Data storage and international transfers

Information that you submit via the Website may be transferred to countries outside the European Economic Area ("EEA"). By way of example, this may happen if one or more of our service providers are located in a country outside the EEA. If we transfer your information outside of the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected. By submitting information via the Website you agree to this storing, processing and/or transfer.

In addition, if you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

Retention of Personal Information

We retain Personal Information that you provide us as long as we consider it potentially useful in contacting you about the Service we provide, and then we securely delete the

information. We will delete this information from the servers at an earlier date if you so request. Please use the contact details at the end of this Policy to do this.

Your rights

You have a legal right under the DPA to a copy of all the personal information about you held by us. On request, we will provide you with a copy of this information subject to a fee not exceeding the prescribed fee permitted by law. You also have a right to correct any errors, outdated information, or omissions in that information. As mentioned above, you have a right to prevent the use of your personal information for direct marketing purposes. To exercise any of these rights, please contact us using the information provided below this Policy.

Status of this Policy

For some of the uses of your information described above there is a basis under the DPA for us to use the information without your consent. Where this is the case, this notice fulfils our duty to process information fairly, which includes giving you appropriate notice and explanation of the way in which your information will be used.

Where your consent is required to the use of your information, by submitting your information to us, you agree that it will be processed in accordance with the terms set out in this privacy policy.

In particular, where your consent is required, you agree that the information we collect from you may be transferred to, and stored at, a destination outside the EEA, including Sri Lanka and India, and to the use of your sensitive personal data as described above.

Contacting us

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data to us by any of the following means:

via the Website; by email at: teacher@thirdspacelearning.com;

by post to: Third Space Learning, 32-38 Leman St, London, E1 8EW