

Steplab: Privacy Policy

Updated: August 2022

Introduction

Welcome to Steplab's Privacy Policy. Capitalised terms used in this Privacy Policy have the same meanings as those set out in the Terms of Service of which this Privacy Policy forms part.

Steplab respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you use the Services (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

1.1 Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Steplab collects and processes your personal data through your use of the Services and Website, including any data you may provide when establishing an account as a Steplab User.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

1.2 Steplab as Data Controller

Save as provided at paragraph 1.3, Steplab is the data controller of all of your personal data that we manage in connection with the provision of the Services.

1.3

Steplab as Data Processor

To the extent that Users upload Permitted Video Content to the Website, Steplab occupies the role of data processor only in respect of any personal data contained therein. The Subscriber occupies the role of data controller for these purposes. Accordingly, the Subscriber must have in place with you its own data protection or privacy policy concerning its use of any of your personal data or that of any other relevant individual in the Permitted Video Content. Steplab has agreed to act in accordance with the lawful instructions of the Subscriber in relation to this personal data under the terms of the relevant Subscription Agreement.

Steplab is entitled to enter into commercial relationships with other third parties pursuant to which it may act as processor or joint controller of specified personal data. We would notify you in advance if this was to take place.

Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact us by email at hello@steplab.co

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you would like to contact us about any of these rights, please email us at hello@steplab.co or write to us at Steplab, 520 High Road Leyton, London, E10 6RL. We will respond to you within 30 days of receiving your request and you will not be charged for this service.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review and it may be updated from time to time in accordance with the Terms.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. **The data we collect about you**

Personal data, or **personal information**, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, or similar identifier, gender, race, date of birth, title, school role, subject taught, School Unique Reference Number, current and former places of work, name of current school and coaching data.
- **Contact Data** includes your email address and telephone number.
- **Profile Data** includes your username and password and feedback and any other data you may choose to share in the course of your use of the Services.

We also collect, use and share **Aggregated Data** such as statistical information on how Steplab Users use action steps, interact with the development materials and development process, and how coaches use both the action step selector and deliberate practice tools. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

We do not undertake any obligatory collection of any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. To the extent we do ever request any Special Category of Personal Data you will always be given the opportunity to decline to provide such information and this will not prevent you from accessing the Website or using the Services.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of the Subscription Agreement, and you fail to provide that data when requested, we may not be able to perform the Services. In this case, we

may have to suspend your access to the Services until this is resolved and we will notify you accordingly.

3. How is your personal data collected?

We collect data from you through direct interaction by you when you register an account to use the Services and when you interact with the Services to the extent that you offer feedback or contribute additional personal data.

As you interact with the Website and use the Services, we will automatically collect Aggregated Data about your browsing actions and patterns. We collect this data by using cookies and other similar technologies but this data does not identify you individually.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For the purpose of providing the Services.
- Where it is necessary for our legitimate interests (or those of a third party such as the Subscriber) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

You can find out more about the types of lawful basis that we will rely on to process your personal data in paragraph 10 below.

Steplab recognises the importance of protecting the privacy of children. We will not knowingly collect any personally identifiable information from children. Our Terms require that Users represent to us that they are an adult. If a child has provided Steplab with personally identifiable information, we ask that a parent or guardian e-mail us at hello@steplab.co and we will delete the child's information from our records.

5.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a Steplab User	(a) Identity (b) Contact	Consent and provision of the Services to you
To manage our relationship including: (a) notifying you about changes to our Terms or Privacy Policy; and (b) allowing you to provide feedback or interact with the Services or upload User Content	(a) Identity (b) Contact (c) Profile	(a) Consent and provision of the Services to you (b) Necessary to comply with a legal obligation
To administer, improve and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance and support)	(a) Identity (b) Contact.	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

Opting -in

If you opt-in, we may communicate with you occasionally about other Steplab opportunities or for important research purposes. If you consented to receive this additional information we will always do our best to provide information to you that is up-to-date and relevant,

whether that is by email, post, text or phone. All our newsletter communications include the option to unsubscribe at any time. In the meantime, if you wish to change how we contact you, please email us at: hello@steplab.co

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

6. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- The Subscriber (School or educational establishment for whom you provide services).
- Our business partners such as the Ambition Institute who may need to respond to your requests or inquiries or help us operate and improve our Website or any programmes offered by Steplab.
- Third parties to whom we may choose to, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers or overseas business partners, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK or require that they adopt the same rules as set out within this Privacy Policy when processing your personal data.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to access the data for the purpose of the delivery of the Services.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. **Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data (see paragraph 10 below).

10. **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note that if you request the erasure of your personal data we will not be able to supply the Services to you.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to provide the Services to you.
- Withdraw consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we will not be able to provide certain the Services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us by email at hello@steplab.co

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests.