

# Privacy Policy

## Introduction

Welcome to the privacy policy of Reading Solutions UK Limited trading as Daisy Education (referred to in this policy as “Daisy Education”, the “Company”, “we”, “us” and “our”). This policy sets out how the Company uses and protects the personal data of its customers, potential customers, previous customers and other third parties, including employees and officers of schools who we engage with in relation to the Reading Plus and DreamBox Maths software and other related support services.

Daisy Education is registered at Companies House with company number 09284598 with its trading address at 1st Floor, Building 7, Queen’s Park, Queensway, Team Valley Trading Estate, Gateshead, NE11 0QD.

Daisy Education is the UK representative/reseller for Discovery Education Inc., the owner of the Reading Plus and DreamBox Maths software. Daisy Education respects your privacy and is committed to protecting your personal data. This privacy policy is provided to tell you about your privacy rights and how the law protects you, and inform you about how we look after your personal data when you:

- Make enquiries about our services; and/or
- Enter into an agreement with us for the provision of our services (together referred to as “the Purposes”)

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. Important information and who we are
2. The data we collect about you
3. How is your personal data collected?
4. How we use your personal data
5. Disclosures of your personal data
6. International transfers
7. Data security
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## 1. Important information and who we are

### Purpose of this privacy policy

This privacy policy gives you information on how Daisy Education collects and uses your personal data in respect of the Purposes.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

### Controller

Daisy Education is the controller of and responsible for your personal data in accordance with the UK data protection laws.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. You should address questions or requests about this privacy policy and our privacy practices, including how your personal data is handled, to our data privacy manager.

### Contact details

Our data privacy manager's contact details are:

**Name:** Ricky John  
**Email address:** [info@daisyeducationuk.com](mailto:info@daisyeducationuk.com)  
**Postal address:** 1st Floor, Building 7, Queen's Park, Queensway, Team Valley  
Trading Estate, Gateshead, NE11 0QD  
**Telephone number:** 0191 389 6078

### Complaints

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. The ICO's website is [www.ico.org.uk](http://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. We will investigate and seek to resolve any complaints as soon as reasonably possible.

### Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review and reserve the right to update this privacy policy or make changes to this privacy policy at any time. This version was last updated in August 2025.

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, surname, title, job role and the name of your employer.
- Contact Data includes email address, telephone numbers and your employer school information i.e. address, website address, etc.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our associated third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly or indirectly reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific service we offer.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, 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.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### **3. How your personal data is collected?**

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding or communicating with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- o Apply for our products or services;
- o Create an account on our website;
- o Subscribe to our service or publications;
- o Request marketing to be sent to you;

- o Enter a competition, promotion or survey; or
  - o Give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [https://site-daisy-educations3.amazonaws.com/media/Policies%20and%20legal%20docs/Cookies%20Policy\\_Daisy%20Education%20.pdf](https://site-daisy-educations3.amazonaws.com/media/Policies%20and%20legal%20docs/Cookies%20Policy_Daisy%20Education%20.pdf) for further details.
  - Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:
    - o Technical Data from analytics providers such as Google, based outside the UK.
    - o Identity and Contact Data from publicly available sources such as from your employer's website.
    - o Identity, Contact and Profile Data from your employer.
    - o Identity and Contact Data from referrals via Discovery Education Inc. whereby your initial registration of interest or enquiry was registered on their website.

#### 4. How we use your personal data

##### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

Please note that while we always wish you to be aware of how we are using your personal data, this does not mean that we always require your consent to use it. Generally, we do not rely on consent as a legal basis for processing your personal data.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of 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.

Purpose/Use	Type of data	Legal basis
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To register you as a new customer		
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- |     |          |  |
|-----|----------|--|
| (a) | Identity |  |
| (b) | Contact  |  |

Performance of a contract with you		
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To process and deliver your order including:		
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|-----|--------------------------------------|--|
| (a) | Managing payments, fees and charges  |  |
| (b) | Collect and recover money owed to us |  |

- |     |                              |  |
|-----|------------------------------|--|
| (a) | Identity                     |  |
| (b) | Contact                      |  |
| (c) | Financial                    |  |
| (d) | Transaction                  |  |
| (e) | Marketing and Communications |  |

- |     |  |  |
|-----|--|--|
| (a) | Performance of a contract with you     |  |
| (b) | Necessary for our legitimate interests |  |

To manage our relationship with you which will include:		
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|-----|--|--|
| (a) | Notifying you about changes to our terms or privacy policy |  |
| (b) | Dealing with your requests, complaints and queries         |  |

- |     |                              |  |
|-----|------------------------------|--|
| (a) | Identity                     |  |
| (b) | Contact                      |  |
| (c) | Profile                      |  |
| (d) | Marketing and Communications |  |

- |     |   |  |
|-----|---|--|
| (a) | Performance of a contract with you  |  |
| (b) | Necessary to comply with a legal obligation   |  |
| (c) | Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) |  |

To enable you to partake in a prize draw, competition or complete a survey.		
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|-----|------------------------------|--|
| (a) | Identity                     |  |
| (b) | Contact                      |  |
| (c) | Profile                      |  |
| (d) | Usage                        |  |
| (e) | Marketing and Communications |  |

- (a) Performance of a contract with you
- (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

- (a) Identity
- (b) Contact
- (c) Technical

(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
- To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications
- (f) Technical

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences and to measure the effectiveness of our communications and marketing.

- (a) Technical
- (b) Usage

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy). To send you relevant marketing communications and make suggestions and recommendations to you about goods or services that may be of interest to you.

- (a) Identity
- (b) Contact

- (c) Technical
- (d) Usage
- (e) Profile
- (f) Marketing and Communications

Necessary for our legitimate interests (to develop our products/services and grow our business).

### **Direct marketing**

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view about which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

### **Opting out of marketing**

You can ask us to stop sending you marketing communications at any time by contacting us by email: [info@daisyeducationuk.com](mailto:info@daisyeducationuk.com).

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

### **Cookies**

For more information about the cookies we use and how to change your cookie preferences, please see [https://site-daisy-education.s3.amazonaws.com/media/Policies%20and%20legal%20docs/Cookies%20Policy\\_Daisy%20Education%20.pdf](https://site-daisy-education.s3.amazonaws.com/media/Policies%20and%20legal%20docs/Cookies%20Policy_Daisy%20Education%20.pdf)

### **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 under UK data protection laws.

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. If you wish to get an explanation as to how the process for the new purpose is compatible with the original purpose, please contact us.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. 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 Purposes for which we will use your personal data above:

- Internal Third Parties as set out in the Glossary below.
- External Third Parties as set out in the Glossary below.
- Third parties to whom we may choose to sell, 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.

## **6. International transfers**

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

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 by the UK to provide an adequate level of protection for personal data.
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement. To obtain a copy of these contractual safeguards, please contact us.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have also 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.

## **8. 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see section 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

You have a number of rights under data protection laws in relation to your personal data.

### **You have the right to:**

- Request access to your personal data (commonly known as a “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 in certain circumstances. 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process

your information which override your right to object.

- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see Opting out of marketing in section 4 for details of how to object to receiving direct marketing communications).
- 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 perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- 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:
  - o If you want us to establish the data's accuracy.
  - o Where our use of the data is unlawful but you do not want us to erase it.
  - o 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.
  - o You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Please visit the Information Commissioner's Office website at [www.ico.gov.uk](http://www.ico.gov.uk) to find out more about these rights. If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of your other rights under data protection laws). 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 may be needed 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.

### **Time limit to respond**

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