

Privacy Policy

This website is operated by Kapture8 Limited (registered number 09958694). Our business operates under the trading name Kapture8 and, in this policy, we use the abbreviation Kapture8.

The service we provide is under relevant legislation, an Information Society Service.

If you have any concerns regarding your data and privacy you can contact us at info@kapture8.com or by mail at 317 Zellig, Gibb Street, Birmingham B9 4AA.

When we use the terms “Company”, “we”, “us”, “our” and “ours” in this privacy policy we are referring to Kapture8.

When we use the terms “you”, “your” and “yours” when used in this privacy policy we are referring to you the reader of this privacy policy.

When we refer to Licence Holder, we refer to the customer of Kapture8 who has entered into a licence with us to use Kapture8.

Introduction to and how this document will help you understand how we respect your and help you protect your personal data.

Your personal data and the way you and others (including here at Kapture8) take care of that data is very important. We know that you will expect us to be committed to the security, privacy and confidentiality of information provided by you or on your behalf. We want to be sure that you are able to understand the personal data that we collect and what happens to that personal data whilst we hold or have access to the data You will expect us to be transparent in our practices and be open with you in the unlikely event that things go wrong and something unexpected happens involving your personal data.

With your help and that of the Licence Holder we want to make sure that the personal data that we hold is always accurate and up to date. You will be able to check back with us and ask to see your personal data held by us at any time.

So, this privacy policy describes our current policies and practices with regard to any personal information collected by us whether from you directly, through the website or, if you are Licensed User or User provided to us by you or by the Licence Holder.

Who we address this document to

This privacy policy has been developed to help individuals whose personal data we come into contact with understand how their personal data is respected. If you are a user of Kapture8 we use the following terminology which will help you understand those parts that are relevant to you:-

Licensed User: an individual with access to Kapture because a Licence Holder who is connected to that person has agreed to accept a licence to use Kapture8 and that individual has been authorised to have licensed access.

User: any other person who is provided with access for the purpose of creating and managing portfolios and/or for purposes of assessing, critiquing and/or mentoring a User.

What do we mean by "personal data"?

Personal information means any information which identifies you, and may include information such as your name, email address, telephone number and information specifically about you (and not any other person) that we either hold or have access to.

Our Privacy Policy

To help you navigate through this document we divide it into sections that you can jump to by following the hyperlinks we have inserted:-

First of all, we explain how we manage data protection compliance at Kapture8;

We then explain that we will be updating this policy statement from time to time;

How do we receive your personal data? The various routes by which we may find ourselves in possession of your personal data are explained;

We next tell you about the personal data that we collect about you;

If you are a user or about to become a user of the Kapture8 product (or thinking of becoming a user) the next section is important to you as it provides a lot of detail about the way we work with the Licence Holder which, necessarily, involves collecting and processing your personal data;

And then we explain how we may use that personal data;

We've invested extensively in technology to help us meet our personal data protection duties and we explain those arrangements including where your personal data may be stored;

We explain procedures that we have in place for keeping your personal data up to date for so long as we are entitled to hold it;

We explain the time periods that may apply to the holding of your Personal Data;

If you should wish to unsubscribe from receiving emails from Kapture 8 we explain how to do that here;

We explain our approach to use of anonymised data and tell you how cookies operate when you are using our website;

We explain how we will approach any circumstances involving disclosure of your information to a third party;

If we offer a link to another website not owned by us we explain how you should take care and consider privacy implications concerning that website;

We include a section on accessing our website from other countries;

Your rights and how we help you take advantage of these – you will find some information here;

And finally we know that you can have concerns relating to how your Personal Data is treated. We are always keen to help and we explain how to contact us – giving you also the contact details for the Information Commissioner's Office.

How we manage Data Protection compliance

Having regard to our responsibilities to comply with the General Data Protection Regulation and other applicable laws, we have appointed an appropriate person

to oversee and to assure compliance of our business with all data protection and e-privacy rules. That person is Majinder Sangah and may be contacted at info@kapture8.com

Notification of changes to our privacy policy

We are continually improving our methods of communication and adding new functionality and features to this website and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. We encourage you to check this page regularly.

This policy was last updated on May 2018.

We have updated this policy to recognise the responsibilities we will have under the General Data Protection Regulation and related UK data protection laws.

The Information we collect

We only hold personal data which is directly relevant to our dealings with you and where any processing we may subsequently undertake of that data can be carried out by us lawfully – for example in pursuance of our legitimate interests as explained within this Policy or for purposes relating to the entering into of a contract with an organisation or person and the subsequent provision of services under that contract. That data will be held and processed in the way we describe within this Policy.

You may have been directed to this Policy through a weblink we provided you with. We make individuals aware of our policy in relation to our holding and any processing of that person's data at the point of collection of the personal data concerned.

How we collect personal information

We may collect your personal information at the point you make an enquiry of Kapture8. This includes any telephone enquiry you may make and enquiries that we receive at trade fairs and in other marketing activities we conduct. Certain information may already be held by us when you make contact if you have researched our business and the Kapture8 product but until you make contact with us will have been held on an anonymised basis

By providing us with your business card or completing any enquiry form that we offer to you we will communicate with you assuming that you are happy that we do so. Your personal details will be processed in these circumstances on the basis that it is in our legitimate interest

to engage with individuals and organisations who are interested in Kapture8 and what we do within the education sector.

Thereafter we will only retain your personal information if we are entitled to do so based upon you having freely consented to further communication and we having informed you that you can withdraw that consent at any future time.

When you indicate that you wish to receive information from us we will accordingly only retain your information on a basis that entitles us to thereafter hold and use that personal data with an express consent provided by you to us holding the data and for each purpose that we then intend to use that data.

If you sign up for any training event or conference we also require personal information so that we can communicate with you about the event.

We have a blog feature on our website and you are encouraged to participate by commenting on blogs that we publish. Contributions are, however, moderated but in submitting a comment you are confirming that it may be published at our discretion with attribution to yourself.

More about Information Collected to enable use of the Kapture8

Information collected in connection with registration

We will collect and process the following data about Licensed Users in connection with registration to access and use the Kapture8 Platform.

If you request demonstration level access to the platform this will be granted under an online process under which you will provide us with your email address, first and second name and a telephone number.

Where a licence to use Kapture8 is purchased the information collected either from the person granted administrative rights on behalf of the educational establishment (if the Educational establishment has registered) or you as the individual teacher (where the individual Licensed User has registered). The information is collected electronically usually via a spreadsheet which will include name, e-mail address, class or other grouping and Licensed Users who are connected to a particular User.

Information collected in connection with sign-in and then use of the Platform where a licence has been purchased

The Platform enables the Licence Holder to make the services on the Platform available to Licensed Users and to Users. We provide an automated "lost password" service enabling Licensed Users and Users to renew their access securely. Kapture8 has no administrator privileges to access data uploaded to Kapture8.

Each individual Licensed User and User will be responsible for determining the access privileges available to individuals who they nominate to view materials uploaded by that

Licensed User or User to Kapture8. Access rights may be time limited at the option of the Licensed User or User.

Kapture8 Licence holders are required to acknowledge and warrant that the licence holder will provide all requisite authority from, and on behalf of, the User including, where relevant, the parent/guardian of any User who is under the age of 13 to (i) allow the User to use the Platform; and (ii) for us to facilitate access to the Platform and make it available to Users.

Information collected in connection with day to day use of the Platform.

Information will also be collected in connection with day to day use of the Platform. Privacy settings mean that no User has access to data other than that associated with that User unless authorised by another User. Licensed Users have authority to access User data uploaded in relation to Users connected to that Licensed User.

Technical information which we collect about you

We will automatically collect the following information in connection with the Teacher Users and Student Users use of the Platform :

- technical information, including your login information, the Internet protocol (IP) address; used to connect the computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information relating to your visit, including the date and time of access, the duration of your visit to the Platform, details of the Platform features which were utilised during the visit and for how long, the location from which the Platform was accessed page response times;
- download errors, page interaction information (such as scrolling, clicks, and mouse-overs);
- methods used to browse away from the page and any phone number used to call our customer service number.

In particular the Platform utilises Google Analytics a web analytics service provided by Google, Inc. Google Analytics uses cookies to help analyse and provide the technical information referred to above as being collected in connection with the use of the Platform.

Much of this information will be collected using cookies. For details of cookies and their use in connection with the Platform please see our Cookies Policy.

Our use of your personal information

For our marketing purposes

If you indicate now or at a future time that you consent to our doing so, we will maintain the personal information you provide us with so that we may:-

- contact you to inform you of new services and products we will be providing;
- send you requested information about our services or products; or
- contact you with updates in the further development of any products and/or services you have expressed interest in.

We may use personal data where we are lawfully entitled to do so in the course of pursuing our legitimate interests as a business engaged in and committed to the success of the education sector.

Our emails provided on the basis above will always have an opt-out option in respect of further communications.

For Purposes of entering into contracts and the management and administration of the contract

We will use the personal information we hold to note enquiries that may be raised in any way that is provided for under the contract. This includes use by Licensed Users and Users of our products or services of any helpline facility that we provide.

We will hold details of your Data Protection Officer or if you do not have one the individual you have identified as responsible for the management of data protection matters.

For the purpose of providing services as required by our contracts with schools, their students and other customers and to continue developing and improving our products and services.

We hold information about certain persons for purposes associated with the administration of contracts that we hold with the Licenseholder. We will hold that information for so long as we have a contract with the organisation concerned or until we are advised of any change in the person or persons we are to work with in the administration and management of the contract in which case details of the previous individual will be deleted immediately unless we are then provided with a consent by that person to continue to communicate in relation to our products and services.

We hold a temporary record only of individuals who call any helpline services that we provide (this will include circumstances where an individual contacts us by another means but is referred to the helpdesk). We will hold only basic contact details to maintain contact with the individual concerned.

To administer events that we organise

We will use information provided at the point of registration to attend any event that we organise such as training workshops, seminars and events we organise at Trade Fairs to keep you advised of the event prior to it being held. We may also contact you afterwards to encourage you to provide us with feedback relating to the event you have attended.

How your information is stored securely

Kapture8 has access to a secure server upon which data is stored. There are also effective data back up arrangements in place in case a data loss incident arises and we need to restore your data back into our system.

Our data centre facility is provided under subcontract. We facilitate the transfer of data to Amazon Web Services ("Amazon") Amazon is a company expert in the provision of secure data storage facilities. More information is available here:- <https://aws.amazon.com/privacy/>

Keeping your Personal Data up to date

We work hard to ensure that Personal Data is held in accurate form at all times. We may receive updates to your Personal Data from the Licence Holder and will act upon that as necessary. To the extent accommodated within the functionality of Kapture8 you may amend your personal details as you wish.

How long do we hold your personal information?

If you make any enquiry of us that does not within a period of 12 months lead to our providing you with a proposal to provide any of our products and/or services or to you responding within that period to the proposal we shall delete the information we have or (if we wish to retain information for the purposes of the further development of our products and services retain the information without any of the same constituting personal data immediately thereafter.

We hold information relating to individuals who are nominated by the Licenseholder as authorised to work with us in contract management and administration for so long as that authorisation is in place or until the contract us with us comes to an end if earlier.

If you register for or attend any event that we organise or participate in and we receive your personal information relating to that, you may be invited to agree

that we market to you thereafter in which case your personal information will continue to be held as explained earlier in this Policy. In all other cases your information will be deleted by no later than [state period to apply].

As a User of our Platform you will be able to manage the information uploaded in various ways. We will assist in any request for data to be downloaded under your data portability right and in your day to day use of the Platform and your account may be deleted at your request (always subject to any legal duty we may be under – this will be exceptional and covers for example any requests by the Police or Counter-Terrorism personnel that we are obliged to co-operate with).

We will delete information associated with any Licence Holder no earlier than three months following termination of that licence.

Where we receive any support request the contact information we obtain to help us manage resolution of the support request is only retained for the period in which we are providing that support.

Unsubscribing from our emails

Where you have consented to contact being made by us with you for any of the purposes mentioned above but you no longer wish to receive emails from us or wish to change your selections as to how or what our contact with you should be please email us at the address given in section 1 with “Email Unsubscribe” in the subject heading.

You may also wish to write to us at the address given in at the beginning of this Policy.

If you choose to unsubscribe from our mailing lists we will only make contact with you again in circumstances where you have consented to our being reprovided with your information and that contact is authorised by you.

Anonymous data collected through this website

In addition to the information we collect as described above, we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers they use. This technology does not personally identify you – it simply enables us to compile statistics about our visitors and their use of our website.

Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again this technology does not identify you personally – it simply enables us to compile statistics about the use of these hyperlinks.

Cookies and similar technologies

In order to collect the anonymous data described in the preceding paragraph, we may use cookie technology on our website.

A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. Cookies do not damage your computer.

You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the services and features offered through our website may not function properly if your cookies are disabled.

We use two types of cookies on our website:

Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for cannot be provided. They are deleted when you close the browser.

Performance cookies (e.g. Google Analytics)

These cookies collect information in an anonymous form about how visitors use our website. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to continually improve the site.

We may also use your IP address to help diagnose problems with our server, to administer our website and to improve the service we offer to you. An IP address is a numeric code that identifies your computer on a network, or in this case, the internet. Your IP address might also be used to gather broad demographic information.

We may perform IP lookups to determine which domain you are coming from

(i.e. aol.com, yourcompany.com) to more accurately gauge our users' demographics.

Information from these types of cookies and technologies or about website usage is not combined with information about you from any other source. None of the cookies or technologies that we use will personally identify you.

Consent

To comply with current legislation, we need to ask for your consent to set the performance cookies described above. When you arrive on our website a banner appears asking for your consent to place performance cookies on your device. By continuing to use our website or by clicking 'OK', we assume that you consent to cookies being placed on your device. If you do not agree please leave our website immediately. Once your consent has been provided, this message will not appear again when you revisit. If you, or another user of your computer, wish to withdraw your consent at any time, you can do so by altering your browser settings.

Disclosure of your personal information

We do not share, sell or distribute your personal information with unrelated third parties, except as otherwise provided for in this privacy policy and in circumstances in which you have expressly consented to the sharing and the purpose for which the sharing is to be undertaken.

We may share, transfer or disclose the information in our databases and server logs to comply with any legal requirements, or in the event of our flotation on a stock exchange, sale, merger, reorganisation, dissolution, disposal of all or part of our assets or similar event. We will inform you of any such transfer or disclosure if required by law.

Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information about yourself.

Transfer of data abroad

If you are visiting this website from a country other than the country in which our servers are located (currently United Kingdom), the various communications will necessarily result in the transfer of information across international boundaries. By visiting this website and communicating electronically with us, you consent to the processing and transfer of your personal information as set out in this privacy policy.

Your Rights and how we will help you with these

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the following rights:

- The right to request access to your personal data;
- The right to request correction of your personal data;
- The right to request erasure of your personal data;
- The right to object to processing of your personal data;
- The right to request restriction of processing your personal data;
- The right to request the transfer of your personal data;
- The right to withdraw consent.

You can find out more about your rights at the Information Commissioner's Office website: www.ico.org.uk

If you wish to exercise any of the rights set out above, please contact us via info@kapture8

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

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.

If you wish to complain

If you have any concerns about the way we handle your personal data please do contact us at info@kapture8 We will take any concerns you have seriously. In the alternative you are entitled to contact the Information Commissioners Office and we provide the contact details below:-

<https://ico.org.uk/concerns/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Further Information

For your reference our VAT number is 257096775