

Privacy Notice

Version 1.3

Date 22 July 2025

HERE ARE THE KEY FACTS

This Global Privacy Notice (“Notice”) provides information to you on how OxEd and Assessment Limited and OxEd and Assessment Inc, (“OxEd & Assessment”) respects the privacy of the student educational records and personal information (referred to collectively as “Customer Data”) provided to us by our K-12 customers (educational institutions) to process on their behalf when they, their staff, access and use our products and services.

This Notice also provides information how OxEd & Assessment may collect personal information (“Collected Data”) when you visit and consent to use our publicly accessible products or websites, including (our “Websites”), (collectively, the “OxEd & Assessment Services”). How we process the information provided or collected may differ based on our relationship with you and our contractual obligations to our customers and users. Below, we’ve detailed the different relationships we may have with you. References to “us,” “we,” “our,” or “OxEd & Assessment Limited” in this Privacy Notice, are referring to OxEd and Assessment.

OxEd and Assessment respects our customers’ privacy and data security requirements. (“Technical Data”) is one way we fulfil that promise to our customers – educational institutions and individuals. Technical Data provides us with the ability to service our customers properly.

- **visit Our websites.**
 - **access one of our assessment platforms**
 - **access any of Our products and services**
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Who are We?

OxEd and Assessment Ltd (OxEd) is a University of Oxford spinout company launched to take the research of Professor Charles Hulme and his team through to practical application in schools.

We create educational assessment apps and interventions which improve educational outcomes for children. Developed by the same research team responsible for the Nuffield Early Language Intervention (NELI) programme. You can contact Us at dpo@oxedandassessment.com

You can always:

- **ask Us for a copy of the information We have about you.**
- **ask Us to update the information We have about you.**
- **ask Us to delete the information We have about you; or**
- **ask Us questions about how We use your information.**

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PURPOSE OF THIS PRIVACY NOTICE

This privacy policy aims to inform you how We collect and process your Personal Data. It is important that you read this privacy policy to fully understand how and why We are using your data.

OxEdu and Assessment, acts as the Controller for its own internal personal data processing and when processing the personal data of visitors to our websites. and is responsible for your Personal Data. We also act as a Data Processor when we process personal data on behalf of and under the instructions or schools and districts. (collectively referred to as "Company", "We", "Us", or "Our" in this privacy policy).

For the purposes of this privacy policy, the following definitions shall have the following meanings:

- "**Comply With a Legal Obligation**" means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that We are subject to.
- "**Controller**" means the organisation that exercises overall control over the purposes and means of processing Personal Data.
- "**Processor**" means the organisation that processes personal data under the instruction of a Data Controller.
- "**Data Protection Laws**" means the UK Data Protection Act 2018 and all other globally applicable legislation relating to privacy or data protection (including the EU General Data Protection Regulation, the California Consumer Privacy Act, the Virginia Consumer Data Protection Act, The New Zealand Privacy Act ("the 2020 Act") and The Australia Privacy Act ("the 1998 Act") amended on November 28, 2022.
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- "**Explicit Consent**" for external marketing means your Personal Data will not be disclosed to any third party unless you have given your explicit consent to such disclosure.
- "**Legitimate Interest**" means the interest of Our business in conducting and managing Our business to enable Us to give you the best service/product and the best and most secure experience. We make sure We consider and balance any potential impact on you (both positive and negative) and your rights 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). You can obtain further information about how We assess Our legitimate interests against any potential impact on you in respect of specific activities by contacting Us.
- "**Performance of Contract**" or "Contractual Necessity" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- "**Personal Data**" means any information relating to natural persons who can be identified or who are identifiable directly from the information in question; or who can be indirectly identified from that information in combination with other information; and
- "**Special Category**" or "Special Categories" of Personal Data means: (a) Personal Data revealing racial or ethnic origin; (b) Personal Data revealing political opinions; (c) Personal Data revealing religious or philosophical beliefs; (d) Personal Data revealing trade union membership; (e) genetic data; (f) biometric data (where used for identification purposes); (g) data concerning health; (h) data concerning a person's sex life; and (i) data concerning a person's sexual orientation.

CONTACT DETAILS

OXED AND ASSESSMENT

- Full name of legal entity: (Controller) (Processor): OxEd and Assessment Limited
- Registered Office Address: Unit 3, Cartwright Way, Bardon Hill, Coalville, LE67 1UE
- Full name of legal entity: (Controller) (Processor): OxEd and Assessment Inc.
- Registered Office Address: 501 Silverside Road, #544, Wilmington Delaware, DE, 19809, USA
- Name of appointed Data Protection Officer: Formiti data International UK Ltd
- DPO Email address: dpo@oxedandassessment.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number Fax: 01625 524 510 [Live Chat Link](#)

If you're a customer within the EU, you can file a complaint to your local member state data protection authority listed [here](#).

If you are a customer from the state of Delaware USA you can file a complaint to the Attorney Office, Consumer Protection Division by completing the form located by [clicking here](#)

We would, however, appreciate the chance to deal with your concerns before you approach the ICO or local DPA, so please get in touch with Us in the first instance.

1.0 YOUR DUTY TO INFORM US OF CHANGES

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.

2.0 THIRD PARTY LINKS

This website includes links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave Our website, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

We collect, use, store and transfer different categories of Personal Data about you, which We have grouped together as follows:

- Identity Data includes but is not limited to first name, last name, username or similar identifier, title, and date of birth.
- Contact Data includes postal address, email address and telephone numbers.
- Financial Data includes bank account, payment card details, and payroll data.
- Marketing and Communications Data include your preferences in receiving marketing from Us and Our third parties and your communication preferences.
- Profile Data information including your username and password, interests, preferences, records of your correspondence and engagement with Us and feedback and survey responses.
- Technical Data commonly known as online identifiers and includes internet protocol (IP) address, unique mobile device identification numbers (such as your Media Access Control (MAC) address, Identifier For Advertising (IDFA), and/or International Mobile Equipment Identity (IMEI), type of device, your login data, browser type and version, time zone setting and geolocation, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from Us.
- Usage Data includes information about how you use Our website, education and assessment platforms, products, and services.

We also collect, use, and share aggregated data, such as statistical or demographic data, for any purpose. Aggregated data is derived from your Personal Data but is not considered Personal Data in law as this data does not directly or indirectly reveal your identity. For example, We aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if We combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, We treat the combined data as Personal Data, which will be used in accordance with this privacy policy.

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. When subscribing to our Products and Services

EDUCATION PLATFORMS

Nuffield Early Language Intervention group of products, **NELI**, **NELI Whole Class** and **NELI Preschool** collectively (NELI products and Services) OxEd Assessment products,

LanguageScreen, ReadingScreen, MathsScreen and **CompScreen** collectively (OxEd Assessment Products and Services)

LEGAL BASIS FOR PROCESSING

Our legal basis for processing your personal information varies depending on the type of information We collect and the context in which We collect it.

If you are a resident of the United Kingdom or of a jurisdiction where similar legal requirements may apply, such as Brazil, Switzerland, and the European Union, We rely on several legal bases to process information about you. We will process information about you where We have your consent, where We have a Legitimate Interest to do so, where the processing is necessary for the Performance of a Contract with you, and where We have a legal obligation to process your information. For example, We typically rely on the following:

- **Consent:** when placing cookies on your device on the web (through Our cookie consent manager) to send you email marketing or to deliver third-party targeted advertising to you on Our services.
- **Our Legitimate Interests:** to process your information when providing you with customer service support, to serve targeted marketing of Our Products and Services (where you have subscribed for an account with Us or purchased Products or Services from Us and you have not opted out of receiving that marketing), for fraud prevention and security purposes; and
- **Contractual Necessity** to process information when you subscribe and create an Account to enable Us to provide you with Our Products and Services.

HOW WE COLLECT YOUR DATA

We use different methods to collect data from and about you, including, but not limited to:

Direct interactions. You may give Us your Identity Data and Contact Data by filling in forms or corresponding with Us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- **purchase** Our products or services.
- **subscribe** to Our Products and services.
- **request** marketing to be sent to you.
- **request support** for Our Products and Services
- subscribe to a research project

Automated technologies or interactions. As you interact with Our **website**, and **Education Platforms** We automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, pixels, server logs and other similar technologies.

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 Performance of a Contract that We are about to enter into or have entered into with you.
- where it is necessary for Our Legitimate Interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where We need to Comply with A Legal Obligation; or.
- where We have your Explicit Consent.

Generally, We do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting Us using the details at section 2 (Contact Details). The withdrawal of consent will not affect the lawfulness of any processing that took place before the withdrawal.

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 may 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 new customer	<ul style="list-style-type: none"> • Identity • Contact • Technical • Profile • Usage 	Performance of a Contract with you
To process and deliver your order including: Manage payments, fees and charges	<ul style="list-style-type: none"> • Identity • Contact • Transaction 	Performance of a Contract with you
To manage Our relationship with you which will include: Notifying you about changes to Our terms or privacy policy	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a Contract with you • Necessary to Comply With a Legal Obligation • Necessary for Our Legitimate Interests (to keep Our records updated and to study how customers use Our products/services)
To administer and protect Our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical • Transaction • Usage • Profile Data 	<ul style="list-style-type: none"> • Performance of Contract • Necessary for Our Legitimate Interests (for running Our business, provision of administration and Educational Products and services, network security, to prevent fraud and in the context of a business reorganisation. • Necessary to Comply with a Legal Obligation
To use data analytics to improve Our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage • Marketing and Communications • Profile 	<ul style="list-style-type: none"> • Explicit Consent where cookies, beacon technology, or similar software is used. • in all other cases 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 process your job application to work with Us	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a Contract with you

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies

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 obtain your consent to do so. 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.

3.0 DISCLOSURE OF YOUR PERSONAL DATA

We may share your Personal Data with third parties set out below for the purposes set out in the table in section 8 (How We Use Your Personal Data) above:

- We may seek to acquire other businesses or merge with them, or Our business or part of Our business may be sold. If a change happens to Our business, then your Personal Data may be disclosed to Our advisers and those of any prospective purchaser or partner, and the new owners or partners may use your Personal Data in the same way as set out in this privacy policy. Your data will only be disclosed for the purposes identified in this privacy policy (as may be updated from time to time) unless a law or regulation specifically allows or requires otherwise.

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. All Our third-party processing partners are vetted under Our third-party due diligence process and have signed data processor contracts with Us.

INTERNATIONAL TRANSFERS

Some of Our external third parties are based outside the UK and the European Economic Area (EEA), so their processing of your Personal Data will involve a transfer of data outside the UK and the EEA.

External Party Category	Transfer Purpose	Lawful Basis
a) Technical Partner	a) Provide technical processing services	a) Contract
b) Reseller, research or support partner	b) Provide support and research services	b) Contract

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, disclosed or being unavailable. In addition, We limit access to your Personal Data to those employees, agents, professional advisers, contractors, and other third parties who have a business need to know on the principle of least privilege (PoLP). They will only process your Personal Data on Our instructions, and they are subject to a duty of confidentiality. We periodically review all privacy and security policies and update them, when necessary, in line with changes in Data Protection Laws or when new technologies are introduced into Our business.

Where the introduction of new technologies results in a high risk to your Personal Data, We will perform a data protection impact assessment and will only proceed if We are able to mitigate any identified high risks. Methods of collecting Personal Data are reviewed by management before they are implemented to confirm that Personal Data is obtained:

- a) fairly, without intimidation or deception, and
- b) lawfully, adhering to all relevant rules of law, whether derived from statute or common law, relating to the collection of Personal Data.

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.

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your Personal Data for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law, We have to keep basic information about Our customers (including Contact, Identity, Financial and Transaction Data) for six tax years plus the current tax year as part of Our legal obligations to do so. In some circumstances, you can ask Us to delete your data: see Request erasure below for further information.

In some circumstances, We may 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.

DATA DISPOSAL

Once the data retention periods above expire, digital records are permanently destroyed or fully anonymised if retained for statistical or research purposes. In this case, all personal identifiers are removed permanently so individuals cannot be identified.

YOUR LEGAL RIGHTS

Under certain global Data Protection Laws (including UK and EU Data Protection Laws) and under certain circumstances, you have rights in relation to your Personal Data. We set out below a brief description of such rights:

- **To be informed:** Individuals have the right to be informed about the collection and use of their Personal Data. This is a key transparency requirement under UK and EU Data Protection Laws. This privacy policy and Our cookie policy meet this requirement.
- **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 subject to certain exemptions.
- **Request rectification of your Personal Data:** 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.
- **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 to continue 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 Personal Data unlawfully or where We have a legal obligation to erase your Personal Data. Note, however, that the right to request erasure is not absolute, and there are circumstances where We do not need to comply with the request, which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your Personal Data:** This enables you to object to processing where We are relying on Our Legitimate Interest (or those of a third party) to process your Personal Data or where We are processing your Personal Data for scientific or historical research or statistical purposes. We do not need to stop processing if We can give strong and legitimate reasons to continue processing your Personal Data. You also have the right to object where We are processing your Personal Data for direct marketing purposes. This is an absolute right but does not automatically mean that We need to erase all of your Personal Data, and in particular, We may put your details on a suppression list to ensure We don't send you direct marketing in the future.
- **Request restriction of processing your Personal Data:** This enables you to ask Us to suspend the processing of your Personal Data in certain scenarios, including (a) if you want Us to establish the data's accuracy; or (b) 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 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 Personal Data you have provided to Us, which you initially provided consent for Us to use or where We used the Personal Data to perform, or take steps prior to performing, a contract with you and where the processing is automated.
- **Withdraw consent at any time where We are relying on consent to process your Personal 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 when you withdraw your consent.

Please note that the above rights are not all absolute and are subject to applicable Data Protection Laws and may be subject to conditions and provisions set out in applicable Data Protection Laws. For

further information or if you wish to exercise any of the rights set out above, please get in touch with Us.

NO FEE IS 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 may 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.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take Us longer than a month if your request is particularly complex or you have made a number of requests, in which case We will inform you of an extension period of up to 2 months. In this case, We will keep you informed on progress.

POLICY UPDATES

Policies and procedures are reviewed and compared to the requirements of applicable laws and regulations at least annually, and whenever changes to such laws and regulations are made, privacy policies and procedures are revised to conform with the requirements of applicable laws and regulations.

ADDITIONAL INFORMATION FOR NON-UK AND NON-EU RESIDENTS.

USA

OUR SERVICES

Description of the Services

Service	Service Description
Websites	Web content and solution for educational content
Education Platforms	Nuffield Early Language Intervention group of products, NELI, NELI Whole Class and NELI Preschool collectively (NELI products and Services) OxEd Assessment products,
Assessment Platforms	OxEd Assessment products, LanguageScreen , ReadingScreen , MathsScreen and CompScreen collectively (OxEd Assessment Products and Services)

CATEGORIES OF PERSONAL INFORMATION

In this section, the terms "Personal Information" or "Personal Data" refer to information that identifies an individual or relates to an identifiable individual or as otherwise defined under US Privacy Laws, including –

- the California Consumer Privacy Act as amended by the California Privacy Rights Act of 2020.
- the Virginia Consumer Data Protection Act of 2021.
- the Colorado Privacy Act of 2021.
- the Connecticut Data Privacy Act of 2022.
- the Utah Consumer Privacy Act of 2023.
- the Nevada Revised Statutes Chapter 603A entitled Security and Privacy of Personal Information of 2021; and their implementing regulations, as further amended from time to time (together "US Privacy Laws").

Education Related Regulations

- the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. § 1232g, and its implementing regulations (34 C.F.R. part 99),
- the Children's Online Privacy Protection Act ("COPPA"), 15 U.S.C. § 6501-6505, and its implementing regulations (16 C.F.R. § 312, et seq.), the Protection of Pupil Rights Amendment, ("PPRA") 20 U.S.C. § 1232(h) and its implementing regulations (34 C.F.R. § 98.1 et seq.),
- the Maryland Student Privacy Act of 2015, Md. Ed. Code Ann., §4-131, Code of Maryland Regulations (COMAR) 13A.08, as well as applicable Board of Education policies and MCPS regulations, including but not limited to MCPS Regulation AFA-RA, Research and Other Data Collection Activities in Montgomery County Public Schools,
- MCPS Regulation JOA-RA, Student Records, and MCPS Regulation JFF-RA, Federal Requirements for Use of Protected Student Information.

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or Device. The following is a list of categories of Personal Information which We may collect or may have been collected from US residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the US Privacy Laws: and state educational personal data regulations,

- **Identifiers:** real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, date of birth or other similar identifiers.
- **Personal information categories** applicable to the processing: name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- **Commercial information:** records and history of products or services purchased or considered; and
- **Internet or other similar network activity:** Interaction with Our Products and Services.
- This does not mean that all examples of that category of Personal Information were in fact collected by Us but reflects Our good faith belief to the best of Our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of Personal Information would only be collected if You provided such Personal Information directly to Us.

CATEGORIES OF SENSITIVE PERSONAL INFORMATION

SENSITIVE PERSONAL INFORMATION

- **Account Login Data:** information used for accessing your account.
- Transaction Data: details about payments to and from you and other details of products and services you have purchased from Us.

SOURCES OF PERSONAL INFORMATION

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from the forms you complete on Our services, preferences you express or provide through Our Products and Services,
- Indirectly from you. For example, from observing your activity on Our Products and Services.

USE OF PERSONAL INFORMATION

We may use or disclose Personal Information We collect for business purposes or commercial purposes, which may include the following examples:

- To provide and maintain Our Products and services: including to monitor the usage of Our Products and services.
- To manage your Account: to manage your registration as a user of the services. The Personal Information you provide can give you access to different functionalities of the services that are available to you as a registered user.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with Us through the services.
- To contact you: to contact you by email, telephone calls, to deliver updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To manage your requests: to attend and manage your requests to Us.
- For business transfers: to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Us about Our services users is among the assets transferred.
- For other purposes: data analysis, identifying usage trends, determining the effectiveness of Our promotional campaigns, and evaluating and improving Our services, products and your experience.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity, including, when necessary, to prosecute those responsible for such activities.

DISCLOSURE, SALE, AND SHARING OF PERSONAL INFORMATION

Disclosure and Sharing of Personal Information

We may use, share, or disclose Personal Information related to you, and may have used or disclosed in the last twelve (12) months the following categories of Personal Information for business or

commercial purposes: identifiers; Personal Information categories applicable to the processing; commercial information; or internet or other similar network activity.

When We disclose Personal Information for a business purpose or a commercial purpose, We enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

SALE OF PERSONAL INFORMATION

We do not sell Personal Information as the term sell is commonly understood. We do allow services providers to use Personal Information related to you for the business purposes described in Our general privacy policy, for activities such as advertising, marketing, and analytics.

EDUCATION CONTRACTS

We do not sell Personal Information as the term sell is commonly understood. We do not allow service providers to use Personal Information related to school employees or students outside of the data processing agreements we have with them. This includes no marketing to any categories of data subjects identified within the data processing agreements as regulated under the Children's Online Privacy Protection Act 1998, 15 U.S.C 6501-6505.

We may sell and may have sold in the last twelve (12) months the following categories of Personal Information: identifiers; Personal Information categories applicable to the processing; commercial information; or internet or other similar network activity.

At any time, you can opt-out of the collection of Personal Information by Our service providers by contacting Us

RETENTION OF PERSONAL INFORMATION

We retain Personal Information related to you for the length of time required for Us to achieve the purposes defined in this section, and as further detailed in the rest of Our privacy policy.

YOUR RIGHTS AND CHOICES

US State Data Protection Laws provide residents of certain states with specific rights regarding their personal information. If you are a resident of the US, US State Data Protection Laws may grant some or all of the rights set out below.

As a **Data Processor** OxEd and Assessment will assist Schools and Districts (**Data Controller**) in answering any Personal Data Rights Requests received by students and parents.

- **The right to notice.** You have the right to be notified which categories of Personal Information are being collected and the purposes for which the Personal Information is being used.
- **The right to know/access.** You have the right to request that We disclose information to you about Our collection, use, sale, disclosure for business purposes and share of Personal Information. Once We receive and confirm your request, We will disclose to you:
 - The categories of Personal Information We collected about you.
 - The categories of sources for the Personal Information We collected about you.
 - Our business or commercial purposes for collecting or selling that Personal Information.
 - The categories of third parties with whom We share that Personal Information.
 - The specific pieces of Personal Information We collected about you.

- If We sold Personal Information related to you or disclosed Personal Information related to you for a business purpose, We will disclose to you the categories of Personal Information categories sold or disclosed.
- The right to say no to the sale or sharing of Personal information (opt-out). You have the right to direct Us to not sell Personal Information related to you. To submit an opt-out request, please see the "Sale of Personal Information" section or contact Us.
- The right to correct Personal information. You have the right to correct or rectify any inaccurate Personal Information about you that We collected. Once We receive and confirm your request, We will use commercially reasonable efforts to correct (and direct Our service providers to correct) Personal Information related to you, unless an exception applies.
- The right to limit use and disclosure of sensitive Personal information. OxEd and Assessment does not use or disclose Sensitive Personal Information for purposes that, under applicable law, require Us to offer consumers a "Right to Limit" the use or disclosure of Sensitive Personal Information.
- The right to delete Personal information. You have the right to request the deletion of Personal Information related to you under certain circumstances, subject to certain exceptions. Once We receive and confirm your request, We will delete (and direct Our services providers to delete) Personal Information related to you from Our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for Us or Our services providers to:
 - Complete the transaction for which We collected the Personal Information, provide a good or services that you requested, take actions reasonably anticipated within the context of Our ongoing business relationship with you, or otherwise perform Our contract with you.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Comply with the relevant US State Data Protection Law and Educational regulations applicable to the processing under this section.
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your consumer's rights, including by:
 - Denying goods or services to you.
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties.
 - Providing a different level or quality of goods or services to you.
 - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

EXERCISING YOUR RIGHTS

To submit a verifiable request to exercise any of your rights (including your right to opt out of the sale of your Personal Information) please Contact Us dpo@oxedandassessment.com

Only you, or a person registered with the competent Secretary of State that you authorize to act on your behalf, may make a verifiable request related to Personal Information related to you.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify you are the person about whom We collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with the required information if We cannot:

- verify your identity or authority to make the request; and
- confirm that the personal information relates to you.

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, We will select a format to provide Personal Information related to you that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.