

TeachScribe Privacy Policy

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1 Introduction

Welcome to TeachScribe. This Privacy Policy explains how Lettingsowl Ltd (referred to as "Lettingsowl", "we", "us", or "our") collects, uses, shares, and protects your personal information when you use our application and services (collectively, the "Services").

We are committed to protecting your privacy and ensuring that your personal data is handled responsibly and in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy is designed to help you understand what information we collect, why we collect it, how we use it, and what choices and rights you have regarding your information.

2 About Us and This Policy

TeachScribe is provided by Lettingsowl Ltd of 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ. A company registered in England and Wales with company number 14754189.

For the purpose of the UK GDPR, we are the data controller for the personal information we process through our Services, unless otherwise stated.

If you have any questions about this policy or our data protection practices, please see the "Contact Us" section.

Our Data Protection Officer can be contacted at support@teachscribe.com

3 Information We Collect

We collect information necessary to provide, maintain, and improve our Services. The types of personal information we may collect include:

- **Account Information:** When you or your institution creates a TeachScribe account, we collect information such as your name, email address, school affiliation and role (e.g., teacher, parent). This information is essential for creating and managing your account and providing access to our Services.
- **User-Generated Content:** Information you voluntarily create, upload, or provide while using our Services. This is core to the TeachScribe experience and includes:
 - *Photographs and Images:* Such as photos of a child's work, classroom activities, or educational materials you choose to upload.
 - *Audio Recordings:* Such as voice notes, classroom discussions, or other audio you record or upload.
 - *Text-Based Content:* Such as notes, observations, assessments, lesson plans, and communications you input into the platform.
 - *Metadata:* Associated information such as date and time.

- **Usage Information:** To help us understand how our Services are used and to improve them, we may collect information about your interactions. This may include diagnostic, crash, and performance information.
- **Device and Connection Information:** We may collect information about the device you use to access our Services. This helps us optimise compatibility and troubleshoot issues.
- **Information from Your School or Institution:** If your account is provided or managed by your educational institution, we may receive information from them to set up and manage your access, such as your name, email, and classroom.

4 How We Use Your Information

We use the information we collect for the following purposes:

- **To Provide, Maintain, and Personalise Our Services:** To operate your account, deliver the functionalities of TeachScribe, personalise features based on your usage (where applicable), and provide customer support.
- **To Enable AI-Powered Features:** To provide advanced functionalities that make TeachScribe a powerful educational tool. This includes using your content for features like transcription of audio, goal linking, organisation of observations, and suggestions to provide insights into your classroom (where applicable).
- **To Improve and Develop Our Services:** To analyse usage patterns, conduct research, troubleshoot issues, and develop new features and services to better meet the needs of educators and children.
- **For Communication:** To send you important service-related announcements, updates, security alerts, and support messages.
- **For Security, Safety, and Integrity:** To verify accounts and activity, detect, prevent, and respond to fraud, abuse, security risks, and other harmful activity. This helps protect our users, our Services, and the public.
- **To Comply with Legal and Regulatory Obligations:** To comply with applicable laws, regulations, legal processes (such as court orders), or enforceable governmental requests.

5 Our Legal Basis for Processing Your Information

We process your personal information based on the following legal grounds under UK data protection law:

- **Contractual Necessity:** Much of our processing is necessary to fulfil our contract with you (or your institution) to provide the Services as described in our Terms of Service.

- **Legitimate Interests:** We process certain information for our legitimate interests. This includes improving our Services, ensuring security, preventing fraud, and conducting analytics.
- **Consent:** In specific situations, we may ask for your explicit consent to process your personal information for a particular purpose (e.g., for certain optional features or marketing communications). If you provide consent, you can withdraw it at any time, and we will stop processing your data for that purpose.
- **Legal Obligation:** We may process your information to comply with our legal obligations under UK law or other applicable regulations.

6 Children's Privacy

TeachScribe is designed for use in educational settings and teachers and institutions may use it to collect and process personal information from children.

- **Role of Educational Institutions:** We rely on educational institutions to obtain any necessary parental consent for children's data to be processed by our Services, in accordance with applicable laws like the UK GDPR. The institution is responsible for ensuring they have the appropriate authority.
- **Information Collected from Children:** The types of information collected from children are generally the same as those described in Section 3, as relevant to their use of the platform (e.g., content they create or upload as part of their educational activities). We also require access to data such as children's names and dates of birth as that is necessary for the functioning of the app in the context of recording and reviewing children's observations.
- **Use of Children's Information:** We use children's information solely to provide our Services, as directed by the school or institution. We do not use children's personal information for targeted advertising or build profiles for commercial purposes unrelated to the provision of the Services.

If you have inadvertently entered personal information from a child without proper consent, please contact us immediately so we can take appropriate action.

7 How We Share Your Information

We are committed to maintaining your trust, and we do not sell your personal information to third parties. We may share your information in the following limited circumstances:

- **With Your School or Institution:** If your account is provided or managed by your school or educational institution, we share information with them as necessary for the provision, administration, and oversight of the Services.

- **With Trusted Service Providers:** We engage trusted third-party companies and individuals to perform services on our behalf (e.g., data hosting, cloud computing, AI processing for specific features, customer support tools, analytics). These providers are carefully vetted and are contractually obligated to protect your information, maintain its confidentiality, and are only permitted to process your data for the specific purposes we instruct and in accordance with this Privacy Policy and applicable laws.
- **For Legal Reasons and Harm Prevention:** We may disclose your information if we believe in good faith that it is reasonably necessary to: (a) comply with a law, regulation, legal process, or enforceable governmental request; (b) enforce our Terms of Service, including investigation of potential violations; (c) detect, prevent, or otherwise address fraud, security, or technical issues; or (d) protect against harm to the rights, property, or safety of TeachScribe, our users, or the public as required or permitted by law.
- **Business Transfers:** If TeachScribe is involved in a merger, acquisition, reorganisation, bankruptcy, sale of assets, or other similar transaction, your information may be transferred as part of that transaction. We will notify you (for example, via email and/or a prominent notice on our website) of any such change in ownership or control of your personal information.

8 International Data Transfers

To provide our Services, your personal information may be processed in countries outside of the United Kingdom (UK). For example, some of our AI-powered features may involve processing data in the European Economic Area (EEA) or other jurisdictions where our service providers operate.

We understand the importance of protecting your data when it is transferred internationally. When we transfer your personal information outside the UK, we will ensure that appropriate safeguards are in place. These safeguards may include:

- Using Standard Contractual Clauses (SCCs) approved by the UK Information Commissioner's Office (ICO), or an equivalent transfer mechanism.
- Ensuring that the recipient is subject to binding corporate rules or adheres to recognised certification schemes or codes of conduct that ensure an adequate level of data protection.
- Relying on adequacy decisions where the UK government has determined that a country provides an adequate level of protection for personal data.

9 Data Security

We are committed to protecting the security of your personal information. We implement and maintain appropriate technical and organisational measures designed to safeguard your data against unauthorised access, use, alteration, disclosure, or destruction. These measures include, but are not limited to:

- Encryption of data at rest and in transit.
- Access controls to limit access to personal information to authorised personnel.
- Secure network architectures and regular security assessments.
- Staff training on data protection and security.

We regularly review and update our security practices to address new and evolving threats.

10 Data Retention

We will retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, as outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, and to resolve disputes.

Generally, this means:

- **Account Information** is retained as long as your account is active and for up to 90 days after account deletion.
- **User-Generated Content** is retained while your account is active to provide you with the Services. Upon account deletion or specific user request (subject to your rights), content will be deleted within 90 days.
- **Children's Personal Data** - when a child is no longer present on our service (such as when they leave an educational institution that uses TeachScribe, are withdrawn from the platform by their school, or when their access is otherwise discontinued), we will delete all personal data relating to that child within 90 days.
- **Backup Copies** of data may be retained for a limited period as part of our disaster recovery and business continuity procedures, after which they are securely deleted.

The 90-day timeframe for Account Information, User-Generated Content, and Children's Personal Data allows for:

- Processing of any data portability requests where legally required
- Administrative processes related to the transition
- Compliance with any legal obligations during the retention period

We regularly review our data retention schedules to ensure we do not keep personal data longer than necessary. When data is no longer needed, we securely delete or anonymise it.

11 Your Rights

Under UK data protection law, you have certain rights regarding your personal information. Subject to any exemptions provided by law, these rights include:

- **The Right to Access Your Information:** You can request a copy of the personal information we hold about you.
- **The Right to Rectify Your Information:** You can request that we correct any inaccurate or incomplete personal information.
- **The Right to Erasure (Right to be Forgotten):** You can request that we delete your personal information from our records, subject to certain legal limitations.
- **The Right to Restrict Processing:** You can request that we limit the processing of your personal information in certain circumstances.
- **The Right to Data Portability:** You can request to receive your personal information in a structured, commonly used, and machine-readable format, and to have it transferred to another data controller in certain situations.
- **The Right to Object to Processing:** You can object to our processing of your personal information where we are relying on legitimate interests as our legal basis, or for direct marketing purposes.
- **Rights Related to Automated Decision-Making and Profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except under certain conditions.
- **The Right to Withdraw Consent:** If we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.
- **The Right to Lodge a Complaint:** You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, if you believe that our processing of your personal information infringes applicable data protection law. Their website is www.ico.org.uk.

If you wish to exercise any of your data protection rights, please contact us at our email address support@teachscribe.com. While we may impose a fee for the exercise of these rights where legally permissible and justified, be assured that any such fee will be reasonable. Additionally, we may request proof of your identity to confirm your request. This verification step is mandatory when you seek to exercise your right to access your personal data or your right to data portability, ensuring the security and proper handling of your information.

12 Cookies and Similar Technologies

We may use cookies and similar tracking technologies (e.g., web beacons, pixels) to collect usage and device information. This helps us to provide and improve our Services, understand how our Services are used, personalise your experience, and for analytics purposes.

13 Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, Services, or legal requirements. We will notify you of any material changes by posting the new policy on our website or through our Services, and/or by sending you an email or other notification. We encourage you to review this Privacy Policy periodically to stay informed about our data protection practices.

The "Effective Date" at the top of this policy indicates when it was last revised.

14 Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy, our data protection practices, or if you wish to exercise any of your rights, please contact us at:

support@teachscribe.com

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We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.