



PRIVACY NOTICE

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WHOLESCHOOL SOFTWARE LTD

BACKGROUND

1. Wholeschool Software Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Information About Us

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2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data includes obvious information such as your name and contact details, as well as less obvious information such as identification numbers, electronic location data, and online identifiers. The personal data that we use is set out in Part 5.

4. What Are Your Rights?

Under the GDPR, you have the following rights: -

- The right to be informed about our collection and use of your personal data.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to object.
- The right to data portability.
- Rights relating to automated decision-making and profiling. We do **not** use your personal data in this way unless explicitly stated.

5. What Personal Data Do We Collect?

- We may collect some or all of the following (depending on your relationship with us):
- Name
- Date of birth
- Gender

- Address
 - Email address
 - Telephone number
 - Business name/School Name and DENI number
 - Job title
 - Profession
 - Payment information
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6. How Do We Use Your Personal Data?

We must always have a lawful basis for using personal data. Your personal data may be used for:

- Providing and managing your account.
 - Supplying our products and services to you.
 - Personalising and tailoring our products and services.
 - Communicating with you.
 - Supplying you with information by email that you have opted in to.
 - With your permission, we may also use your personal data for marketing purposes.
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7. How Long Will We Keep Your Personal Data?

We will not keep your personal data longer than necessary for its original purpose.

8. How and Where Do We Store or Transfer Your Personal Data?

Most data is stored on secure UK servers. Some may be transferred to third countries, and where this occurs, we ensure appropriate safeguards such as adequacy decisions or approved contractual clauses.

9. Do We Share Your Personal Data?

We will not share your personal data with third parties except where legally required or where necessary to deliver contracted services.

10. How Can You Access Your Personal Data?

You can request access through a “subject access request.”

11. How Do You Contact Us?

Use the contact information provided earlier for any personal data queries.

12. Changes to this Privacy Notice

We may change this Privacy Notice occasionally. The EU decided on 28 June 2021 that UK GDPR provides adequate protection.

13. GDPR AI Compliance Policy

As part of our commitment to transparency and responsible technology use, Wholeschool Software Ltd maintains the following policies regarding the use of Artificial Intelligence (AI):

13.1 Use of AI Systems

We may use AI-driven tools to support product functionality, analytics, security monitoring, or service optimisation. **We do not use AI systems to make automated decisions that produce legal or significant effects on individuals**, unless expressly stated and accompanied by additional safeguards.

13.2 Lawful Basis for AI Processing

Where AI systems process personal data, we ensure a valid lawful basis such as: -
Contractual necessity - Legitimate interests (balanced against your rights and freedoms) -
Consent (where required)

13.3 Data Minimisation and Purpose Limitation

Any personal data processed by AI is limited to what is necessary to achieve the intended purpose. We do not use AI to process more data than required.

13.4 Human Oversight

All AI-assisted processes are overseen by human staff. Final decisions affecting individuals are **never** made solely by AI.

13.5 Transparency

We will inform users when AI technologies are used in a way that meaningfully contributes to the processing of their personal data.

13.6 No AI Training Using Customer Data

Customer data is **not** used to train third-party AI models unless explicit consent is obtained or unless data is fully anonymised and cannot be linked back to an individual.

13.7 AI Providers and Data Sharing

Where third-party AI services are used, we ensure: - GDPR-compliant data processing agreements - Processing only under our instructions - Adequate safeguards for international transfers

13.8 Security and Risk Management

We conduct Data Protection Impact Assessments (DPIAs) for AI use cases that pose potential high risk to individual rights and freedoms.

13.9 Your Rights in Relation to AI

You maintain all GDPR rights, including: - the right to object to AI-assisted processing; - the right to request human intervention where AI contributes to decision-making; - the right to explanations regarding AI-involved processes where applicable.
