



## PRIVACY POLICY & DATA PROTECTION

We Take your Privacy & Data Seriously

### Definitions

"the Service" is defined as your use of the BoomApps subscription service.

"Boom Apps" are defined as BoomReader and BoomWriter websites and applications.

### About

BoomApps ("We") are committed to protecting and respecting your privacy. This policy sets out the basis for any personal data we collect or that you provide to us which is processed by us. For the purpose of the Data Protection Act 2018 (the "Act") and the General Data Protection Regulation ("GDPR"), the Data Processor is BoomApps. Children are identified as under 13 years of age with regard to GDPR, therefore all data for children is collected from schools in line with their GDPR and Privacy Policy.

### Why We Collect Your Data

Any personal data we collect for children and adults is only necessary for BoomApps applications to function as well as improve user experience.

### What Data We Collect

We may process the following data:

#### School Specific Data

- School name and contact information (including school postal address, phone number and email address)
- Teachers' names and contact information (including phone numbers and email addresses)
- Pupils' names, class, year groups and email addresses (optional)

#### Interaction Specific Data

- Details of interactions that the School and its Data Subjects have with us regarding the Product, together with any other information that the School and its Data Subjects choose to provide us with, for example, through correspondence and interactions with our customer and technical support teams.
- Information collected automatically relating to the Product to include information like a user's IP address, device type, unique device identification numbers and login information, browser-type and version, time zone setting, operating system and platform, broad geographic location (e.g., country or city-level location) and other technical information.
- Information collected automatically relating to the Product about how a user's device has interacted with the Site, including the pages accessed and links clicked, download errors, length of visits to certain pages, page interaction information, and methods used to browse away from any page.

- The writing provided by users of the Product and the results and activity of the voting process.

### Confidentiality of Data Processing

BoomApps shall ensure that any person that it authorises to process data (including the BoomApps' staff, agents and subcontractors) (an "Authorised Person") shall be subject to a strict duty of confidentiality (whether a contractual duty or a statutory duty or otherwise) and shall not permit any person to process data who is not under such a duty of confidentiality.

BoomApps shall ensure that all Authorised Persons process data only as necessary for the Permitted Purpose.

### Security

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing to be carried out by the BoomApps, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, BoomApps shall implement appropriate technical and organisational measures to protect data from (i) accidental or unlawful destruction, (ii) accidental loss, alteration, unauthorised disclosure or access, and (iii) any other breach of security ((i), (ii) and (iii) together, a "Security Incident") in each case appropriate to that risk.

### Data Protection Impact Assessment

If BoomApps believes or becomes aware that its processing of certain data is likely to result in a high risk to the data protection rights and freedoms of data subjects, it shall promptly inform the School and provide the School with all such reasonable and timely assistance as the School may require in order to conduct a data protection impact assessment and, if necessary, consult with its relevant data protection authority.

### Security Incidents

- Upon becoming aware of a Security Incident, the affected party shall inform the other party without undue delay and shall provide all such timely information and cooperation as the other party may reasonably require including in order for the affected party to fulfil its data breach reporting obligations under (and in accordance with the timescales required by) Applicable Data Protection Law.
- The parties shall each further take all such measures and actions as are reasonably necessary to remedy or mitigate the effects of the Security Incident and shall keep the other party up to date about all developments in connection with the Security Incident.

### Deletion or Return of Data

- Upon a written request by the School, BoomApps shall destroy all Data (including all copies of the Data) in its possession or control (including any Data subcontracted to a third party for processing)
- Upon deletion of a student account all associated work will be anonymised. This work may feature in published outcomes of the project and will be retained by BoomApps and potentially used to further enhance the Product.
- This requirement shall not apply to the extent that the BoomApps is required by any EU (or any EU Member State) law to retain some or all of the Data, in which event the Company shall isolate and protect the Data from any further processing except to the extent required by such law.

## Consumer Data Policy

- BoomApps use Stripe (<https://stripe.com>) to securely process all online payments. Card details will only be stored upon customer request at the point of purchase.
- For invoiced payments, stringent physical and technological measures are taken to protect User's payment information.

## Sharing Information

We do not routinely share any data we collect. We would only share data if you had given your permission.

## International Data Transfers

We shall not transfer data (nor permit data to be transferred) outside of the European Economic Area ("EEA") unless it first takes such measures as are necessary to ensure any such transfer is in compliance with Applicable Data Protection Law.

## Requesting Access to Your Personal Data

The GDPR gives you the right to access information held about you. You also have the right to request that this data is deleted at any time.

## Subcontracting

BoomApps may appoint subcontractors to carry out any or all its data processing activities in accordance with the terms of this paragraph.

Where BoomApps uses a subcontractor, it shall ensure that it imposes data protection terms on any sub-contractor it appoints that protect the Data to the same standard as those provided for in this schedule and meet the requirements of Applicable Data Protection Law.

BoomApps acknowledges that it remains fully liable for the acts, errors or omissions of any of its subcontractors in respect of the Processing of the Data.

## Contact

Mr Gavin Hawkins.

[gavin@squirrellearning.co.uk](mailto:gavin@squirrellearning.co.uk)

To discuss anything in this privacy policy or to request access to your data, please email the above address or post your request to:

Squirrel Learning Limited,  
Technology Centre  
University of Wolverhampton Science Park,  
Glaiser Drive,  
Wolverhampton  
West Midlands, WV10 9UR.

If you have a concern about the way in which we are collecting or using your personal data, should raise your concern with us in the first instance, or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns>

This document was last updated on 4th October 2023.

## Links to Other Websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## Cookies

This site uses cookies. Cookies are small text files that are automatically placed on your computer when you visit the website. The vast majority of websites on the internet use cookies.

## Facebook

This Website uses analytical cookies, pixels and other technologies by Facebook, Inc. ("Facebook"), allowing the collection or retrieval of information from this Website and other sites on the internet. This information may be used by Facebook to provide ad measurement and targeting services to us and third parties.

## Google Analytics

This website uses Google Analytics to help analyse how users use the site. The tool uses cookies to collect standard Internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any Personally Identifiable Information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any Personally Identifiable Information from any source.

Most web browsers allow some control of cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).