



Privacy Policy

Effective Date: 11th May 2018

1. Introduction and General Terms

Airhead Education Ltd is committed to protecting your personal information when you are using our services. We want our services to be safe and enjoyable environments for our users. This Privacy Policy relates to our use of any personal information you provide to us online, via phone or text, by email, in letters or correspondence.

Airhead is a web-based platform designed to support the curation, organisation and sharing of digital resources within and between educational organisations such as schools, colleges and universities. Airhead integrates with a number of third parties for the purpose of identity management including Microsoft Office 365, Google Apps, Facebook and Groupcall.

In order to provide you with the full range of our services, we sometimes need to collect information about you. This Privacy Policy explains:

- what information Airhead Education Ltd may collect about you;
- how Airhead Education Ltd will use information we collect about you;
- when Airhead Education Ltd may use your details to contact you;
- whether Airhead Education Ltd will disclose your details to anyone else;
- your choices regarding the personal information you provide to us; and
- the use of cookies on our websites and how you can reject these cookies.

Airhead Education Ltd is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the General Data Protection Regulation or GDPR (these laws are referred to collectively in this Privacy Policy as the “data protection laws”).

Airhead Education Ltd is registered with the [Information Commissioner's Office](#), registration number ZA148188. Please also read our [Data Processing Agreement](#) and our [Terms of Service](#).

You may wish to save a copy of this Privacy Policy for your records. In any event, be sure to regularly check our websites for any updates or other changes. The applicable Privacy Policy will be posted at <http://airhead.io> and / or

<http://www.airhead-education.com> and we will indicate the effective date of each update at the top of the Privacy Policy.

Our websites and our products, services and activities may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information you submit or is collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

2. What information will Airhead Education Ltd collect about me?

When you participate in, access or sign up to any of our products, services or activities, or create an account using our online registration system, we may receive personal information about you. This can consist of information such as your name, email address, postal address, telephone number or date of birth, depending on the products, services or activities. By submitting your details, you enable us (and, if applicable, our contractors) to provide you with the products, services or activities you select.

The Services may contain third party links or allow you to access the Services through third party platforms, such as [Groupcall](#), [Facebook](#), [Google](#) and [Microsoft](#). If you use our Services on or through a third party platform, including via any any mobile and/or other Internet connected devices, or click on third party links, the collection, use, and disclosure of your information and your use of the Services will also be subject to the privacy policies and other terms of such third parties or third party platforms. You should review such privacy policies, terms, and other agreements.

Please note that sometimes we will require you to provide additional personal information, and sometimes sensitive personal information. When we do this we will provide further information as to why we are collecting your information and how we will use it.

Airhead Education Ltd may also collect a range of information about the way you use our products, services and activities, including information about which websites you visit. This information is anonymised and it is not possible for us to identify the individual user who produced this information.

We may also use cookies (see section 12 below for details) and collect IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet) from visitors to our websites.

Personal data will only be processed for the following purpose:

- User and service authentication to Airhead
- User membership of groups within Airhead
- Population of widgets with data from specific third party providers
- Financial transactions
- Sales and marketing transactions
- Help and support transactions

The following types of data will be accessible to Airhead Education Ltd:

- User and service authentication to Airhead
 - Display name (provided via the identity provider)
 - Your profile picture or its URL (provided by the identity provider)
 - Email address (provided via the identity provider)
 - Role name (provided via the identity provider)
 - Establishment name (provided via the identity provider)
 - User generated authorisation tokens for retrieving personal content such as lists of files, emails, calendar events from Google and / or Microsoft cloud services
- User membership of groups within Airhead
 - Group name
- Population of widgets with data from specific third party databases
 - Widget specific information, e.g. timetable information
- Financial transactions contact(s) information
 - Financial contact name, email address, telephone number and postal address
- Sales and marketing transactions contact(s) information
 - Sales contact name, email address, telephone number and postal address
- Help and support transactions contact(s) information
 - Support contact name, email address, telephone number and postal address

You may choose not to allow a third party platform to provide us with certain information about you, but you might not be able to use certain features of our services if you enable such restrictions.

Public posting / shared content

Some of the services may allow you to interact with other users and/or post, share, communicate or otherwise transmit content publicly, such as by posting comments about a digital resource or sending messages in Channel. We may collect and store public postings and shared content. Shared content or public postings may be

publicly available or viewable by others depending on where and how such content is posted. Airhead does not share or otherwise make use of this information and has no rights over it unless with your express permission.

Communications, support requests and potential abuse

If you contact us for assistance, or to report a problem, concern, potential abuse or other issues regarding the services, including before you have created an account, we may collect and store your contact information, communication, and/or other information about you, including but not limited to your name, email, location, operating system, IP address, any other information you provide us in the course of such communications, and/or other information that may be collected by automated means described herein. We reserve the right to conduct further research and obtain further information as necessary. We will use the information to respond to you and research your request/communication, all in accordance with the provisions of this Privacy Policy.

Payment Information

If you purchase our services, we may collect certain information regarding your purchase (such as your name, address and email) as necessary to process your order. We only accept payment by direct bank transfer and therefore we do not hold financial information such as credit card information.

Technical and Usage Data

When you access the services, including browsing our website, we collect certain information by automated means. This information may include without limitation: (a) technical information about your computer or wireless device, such as your IP address, device type, operating system type and version, unique device ID, browser, browser language, domain and other systems information, platform types, and (b) usage statistics about your interaction with the services, including websites accessed, time spent on pages or the services, pages visited, search queries, click data, portions of the services used, date and time, and other information regarding your use of the services.

This technical information and usage data, which may be linked to your information, is collected through the use of server log files and tracking technologies, including: (i) cookies, which are small files that websites send to your computer or wireless device to uniquely identify your browser or mobile device or to store information in your browser setting; and (ii) web beacons, which are small objects that allow us to measure the actions of visitors using the services. For more detailed information regarding how we use cookies and other technology, please review the additional information in this Privacy Policy under section 12 below.

3. How will Airhead Education Ltd use information they collect about me?

We will use your personal information for a number of purposes including the following:

- Provide, administer, and facilitate your use of the Airhead, including to display custom content;
- Process or fulfill your request(s) and/or order(s) for Airhead services;
- Communicate with you concerning your account by:
 - Responding to your questions or concerns;
 - Sending you service and administrative messages and information, including about changes to the service, and updates to our Terms of Service and Privacy Policy;
 - Emailing you information or providing in-app messages such as about new services, new features and issues affecting the service;
- Understand and improve the services and develop new products, services or features;
- Enable user-to-user communication and interaction;
- Manage your account preferences and establish your profile;
- Facilitate the technical functioning of the services, including without limitation to troubleshoot and resolve issues, secure the services and prevent fraud and abuse;
- Respond to customer support questions and issues and resolve disputes;
- Create, review, analyse and share technical Information;
- Analyse trends and user traffic, track purchases and usage information;
- Advertise our services on third party websites or mobile applications
- Market, process or fulfill promotions administered or sponsored by Airhead;
- Solicit feedback from users;
- As required or permitted by law;
- As we, in our sole discretion, otherwise determine to be necessary or required to ensure the safety and/or integrity of our users, employees, third parties, members of the public, and/or our services.

We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Where we propose using your personal information for any other uses we will ensure that we notify you first. You will also be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed above.

4. When will Airhead Education Ltd contact me?

We may contact you in relation to any product, service or activity you have signed up for in order to ensure:

- A. that we can deliver the product, service or activity to you;
- B. where you have opted to receive further correspondence;
- C. in relation to any contribution you have submitted to us;
- D. to invite you to participate in surveys about our services; and
- E. for marketing purposes where you have specifically agreed to this

5. When and how we may share your information with third parties

We will share your information with the following third parties or under the following circumstances or as otherwise described in this Privacy Policy:

- A. About you if you are part of an organisation who is subscribing to Airhead:
 - a. We may share service usage information with the subscribing organisation to which you belong.
 - b. We may share identifying information with the subscribing organisation if you, as an individual user, are in breach of our Terms of Service.
- B. Third party business partners, service providers, contractors or agents:
 - a. We may store your personal information in products and/or services provided by third party companies such as but not limited to Google G Suite, Microsoft Office 365 and Zoho. We will only use companies that are fully compliant with the GDPR.
- C. About you with other users:
 - a. If you are part of an organisation subscribing to Airhead, other users may be able to see your name in lists of group membership within your

organisation for the purpose of sharing. Apart from group membership, we will not share information about you with other users but you may choose to do so in which case information about you, such as your name, may be publicly viewable by other users.

D. Analytics and data enrichment services:

- a. As discussed above, We use third-party analytics such as Google Analytics to help understand your usage of our services and to improve our service. We may provide de-identified data to such third party analytics and data enrichment service providers.

E. With your permission:

- a. We may share information with your consent to third parties not within scope of this Privacy Policy.

F. Aggregate or de-identified information:

- a. We may disclose or use aggregate or de-identified information for any purpose.

G. Advertising of Third Party Products/Services:

- a. We do not offer advertising within Airhead or on any of its websites.

H. Social media features

- a. Our services may include social media features, such as the Facebook Like button. Our integration of these features may allow third party social media provided to collect certain information such as your IP address, which page you are visiting when using our services, and to set a cookie to enable the feature to function properly. Social media features are hosted by a third party and your interactions with these features are governed by the privacy policy of the company providing it.

I. Safety, security and cooperation with law enforcement and legal obligations:

- a. We may disclose your information to third parties, if we, in our sole discretion, have a good faith belief that disclosure is: (1) permitted or required by law; (2) requested in connection with or relevant to a judicial, governmental or legal inquiry, investigation, order, or proceeding; (3) required or reasonably necessary pursuant to a valid subpoena, warrant or other legally valid inquiry or request; (4) reasonably necessary to enforce our Terms of Service, this Privacy Policy, or any other legal agreements; (5) required to detect, prevent, or otherwise address fraud, abuse, misuse, potential violations of law

(or rule/regulation), and/or security or technical issues; or (6) required or reasonably necessary in Our discretion to protect against imminent harm to the rights, property or safety of Airhead, our users, employees, members of the public and/or our services. We may also disclose information about you to our auditors or legal advisors in conjunction with accessing our disclosure obligations and/or rights under this Privacy Policy.

6. How do we keep your information secure?

Airhead takes appropriate security measures to protect against unauthorised access to, or unauthorised alteration, disclosure or destruction of, data that you share and we collect and store. We only use partners who we take appropriate security measures to protect the data we share with them. These measures vary based on the sensitivity of the data we collect and store. Unfortunately, however, no system can be 100% secure and we cannot guarantee that communications between you and Airhead, the services, or any information provided to us in connection with the information we collect through the services will be free from unauthorised access by third parties. Unauthorised entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. Your password is an important component of Our security system. As such, it is your responsibility to protect it. Do not share your password with any third parties. If your password has been compromised for any reason, you should change it immediately and contact your identity provider as soon as possible. If your identity provider is Airhead, you should contact us on: team@airhead-education.com

7. What if I am a user aged 16 or under?

If you are aged 16 or under, we will only retain personal information about you with your parent/guardian's permission. Users without this consent are not allowed to provide us with personal information.

8. How long will Airhead Education Ltd keep my personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant product, service or activity, or as long as is set out in any relevant contract you hold with Airhead Education Ltd. If you cancel your registration as a service user and your account is deleted, a flag is added to the database and, while we cannot use the personal information, it stays on the system indefinitely in order to ensure you are not re-contacted in error.

Where you contribute material to Airhead Education Ltd we will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted.

9. Can I find out what personal information you hold about me?

Under GDPR, you have the right to request a copy of the personal information Airhead Education Ltd holds about you and to have any inaccuracies corrected. We will require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts to supply, correct or delete personal information about you on our files.

Please address requests and questions about this or any other question about this Privacy Policy to the Data Protection Officer, Airhead Education Ltd, 21 Chaucer Road, Bath BA2 4QX, UK (email: team@airhead-education.com)

10. What if I am accessing your websites outside the UK?

For international users accessing our products, services and activities from outside the UK, they are made available to you on a commercial basis under licence from Airhead Education Ltd. Personal information supplied provided to us is stored and retained in the European Union. All personal information submitted by you will be processed in accordance with this Privacy Policy.

11. Cookies Policy - Information Airhead Education Ltd collects from you

Like many websites and app providers, Airhead (and/or service providers acting on our behalf, such as Google Analytics) may use server log files and automated data collection tools, such as cookies, tags, scripts, device or browser fingerprints, and web beacons when you access and use our services. In some cases, we tie the information gathered by these means to other information you provide and that we collect as described in this Privacy Policy. These data collection tools automatically track and collect certain technical information and usage data that your browser sends when you use our services. In some cases, We will associate this technical information and usage data with other information about you. This aggregation of this data is only used to improve the performance of the Airhead service and/or provide the owner of the data with information they request.

We use cookies for a variety of reasons, including to: (i) analyse the usage of our services; (ii) provide a more personalised experience; (iii) allow you to more easily login to use our services; and (iv) help make your use of our services more efficient and more valuable by providing you with a customised experience and recognising you when you return.

We may also employ web beacons or other technology for a variety of reasons such as: (i) allowing us to know if a certain page was visited or whether an email was opened; (ii) allowing us to advertise more efficiently by excluding our current users from certain promotional messages.

Airhead uses the following types of cookies:

- **Preferences** - We use preferences cookies to remember information about your browser and how you prefer to use our service, i.e. to remember your preferred settings that affect the experience of how our services look to you or behave when you access and/or use them, such as your preferred language. Preference cookies make your experience of interacting with our services more functional and customised to suit your preferences.
- **Security** - We use security cookies to enable you to login and access our service, to protect your account against fraudulent logins by others, and help detect, fight, and protect against abuse or unauthorised usage of your Account.
- **Functional** - We use functional cookies to make the experience of using our services better, like remembering what page you last used.
- **Session State** - We use session cookies to collect information about how you interact with our services, to help us improve our services, as well as improve your browsing experience. We also use session cookies to remember your login details. These are deemed strictly necessary to the working of the services. If these are disabled, then various functionalities of our services will be broken.

You can set your web browser to warn you about attempts to place cookies on your computer, limit the types of cookies you allow or refuse cookies altogether, however, you may not be able to use some or all of the features of the services, or your experience will be different or less functional if you refuse/disable cookies.

Third parties with whom we partner to provide certain features on our site may use local storage objects, also known as Flash Cookies (LSOs) to collect and store information. Various browsers may offer their own management tools for removing LSOs.

By using our services, you consent to our use of cookies, web beacons, LSOs and other data collection tools as described in this Privacy Policy.

12. Analytics

We may use third-party browser and mobile analytics services on our service, including but not limited to [Google Analytics](#) and [Amplitude](#). These service providers use the sort of technology described above to help us analyse how users use the services, including by noting the third-party website from which you arrive, how often you use the services, the events that occur within the service, usage data, performance data, and where the application was downloaded from.

The information collected will be disclosed to or collected directly by these service providers, and we use this information to improve the services, to better understand

the functionality of the services on a computer or other device, and to provide information that may be of interest to you.

For instance, Amplitude provides information about “user journeys” which we use to improve the way in which the Airhead user interface is designed.

You have some choices concerning our use of these analytics. For instance, to prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#).

13. Online Advertising

There is no online advertising on Airhead’s websites or within any part of our service. Third party services or websites that are accessed using Airhead may contain online advertising.

We may use third-party advertising technologies that allow for the delivery of advertising about our services on other websites you visit and other applications you use.

We use third parties to help deliver tailored advertising on other websites and in mobile applications. These third parties may place cookies or other tracking technologies on your computer, mobile phone, or other device to collect information about your use of the services and may access these cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the services in order to serve these tailored advertisements.

We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed on your computer, mobile phone, or other device you use to access the services by non-affiliated, third-party ad technology, ad servers, ad networks or any other non-affiliated third parties. Those parties that use these technologies may offer you a way to opt out of ad targeting as described below. You may receive tailored advertising on your computer through a web browser. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored advertising, you may visit the Network Advertising Initiative’s Consumer Opt-Out [link](#) or the Digital Advertising Alliance’s Consumer Opt-Out [link](#) to opt out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for display advertising or customise Google display network ads, you can visit the [Google Ads settings page](#).

When using a mobile application you may also receive tailored in-application advertisements. Each operating system, iOS for Apple phones, Android for Android devices and Windows for Microsoft devices provides its own instructions on how to

prevent the delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems in order to opt out of tailored in-application advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or contact the applicable platform operator.

Please note that you may still receive advertisements on other websites and mobile applications even if you opt out. In that case, the advertising will not be tailored to your interests. Also, we do not control any of the above opt out links or whether any particular company chooses to participate in these opt out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

14. Changes to Airhead Education Ltd's Privacy Policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to Airhead Education Ltd. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use our websites to submit personal information to us. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

15. Contacting Airhead Education Ltd about this Privacy Policy

If you have any questions or comments about this Privacy Policy please contact:

The Data Protection Officer
Airhead Education Ltd
21 Chaucer Road
Bath
BA2 4QX
United Kingdom

Email: team@airhead-education.com