



The Liiift Up Ltd (web-based version) Privacy Policy

This privacy policy describes the information we collect and use to support our website and the services we offer, including The Liiift Up Ltd website. This Privacy Policy is governed by the laws of England and Wales.

1. The basics

- This site and other services offered through it, the “**Website**”, is intended to be used by teachers and parents/guardians as a wellbeing tool for children (“**Students**”).
- Teachers and parents/guardians may register on the site, and as a result become “**Users**” as well as students.
- Users may set up individual accounts for their Students, which allow the Students to access, and the User to track Students’ wellbeing in their use of the Website.
- Accounts may only be established by Users, and not by Students themselves; Students must have Users’ permission to use the Website.

The Liiift Up Ltd Limited (we) are committed to protecting and respecting your privacy and personal data. This Privacy Policy relates to your use of the The Liiift Up Ltd Website. As the processing of some data is essential to the functioning of the Website if you do not accept the terms of this Privacy Policy you should not use the Website.

2. The purpose

The purpose of this Privacy Policy is to let you know what kinds of information we may gather about you (whether you are a User or a Student), how we may use that information, why your information will be used, namely for purposes of the performance of our contract with you as our User, whether we disclose it to anyone, and the choices you have regarding our use of the information. Words and phrases used in this Privacy Policy have the same meaning as is attributed to them in the [‘The Liiift Up Ltd Terms and Conditions’](#).

This Privacy Policy provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR). This policy primarily covers how we use information relating to our parent/guardian Users who set up accounts on behalf of their own children. In these cases, we will be the “data controller” for the purposes of data protection law. There are also cases where we will be a “data processor” for the purposes of data protection law. Where schools, educators and/or teachers set up accounts on behalf of students, we are processing your personal information on behalf of the educator/school/teacher in order that they can provide educational services to their students. In circumstances where we are a data processor, it is the educator/school/teacher who decides what personal information to collect and how that information is used. Any questions that you may have relating to your personal information and your rights under data protection law should therefore be directed to the school/teacher as the data controller, not to us.

It is important that you read this policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

3. Data protection principles

We are required by the UK GDPR to ensure that we follow six principles whilst we are processing your information and it is these principles that are central to our processing procedures. Your information will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

4. Personal information we collect from you

Personal data, or personal information as we sometimes call it, means data which relates to an identifiable living person. Users may from time to time provide us with personal data, such as the following:

- The User's name and email address – and potentially postal address and telephone number(s);
- Identification information relating to the User's Student(s), such that the User is able to identify the Student in question;
- Correspondence through the Website, and correspondence sent to us by the User;
- Information based on Students' wellbeing and feeling; and
- Information we ask the User to submit to verify identity;
- Information given to us in User feedback surveys;
- Due to the nature of the service that we provide we do collect "special categories" of sensitive personal data from our Users. Special category information includes; race or ethnicity, religion, sexual orientation, political views, trade union membership and physical or mental health. As the student, you provide us with information regarding your mental health, we will take extra care to ensure your rights are protected.

5. How is your personal information collected?

We collect your personal information through different methods including:

- Direct interactions with you via our website, e-mail, phone, User feedback surveys or otherwise.
- Information passed through to us from schools' data systems to set up the student account.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies.
- We may use this automated technology to collect anonymous information about the use of the Website. For example, our web server may automatically log which parts of the Website Users or Students view, their IP addresses and which web browsers they use. This technology does not identify the User or Student personally but enables us to compile statistics about the use of the Website so we can improve it over time; it also enables us to adapt the Website to a Student's progress and ability.

6. Cookies

Cookies are small files which, depending on your browser settings, may be automatically stored on your computer's hard drive when your Web browser accesses a specific Web page.

We use cookies for purposes such as helping us to identify and track visitors' usage and preferences.

We are of the view that these cookies are not intrusive.

Note that you may not be able to obtain and use an Account on the Website, nor will you be able to use certain aspects of the Services, if your browser is set to reject cookies.

You can find out how to manage cookies at this site: www.allaboutcookies.org/manage-cookies

7. Why is your information collected?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where you have provided your consent.
- Where we need to perform the contract 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 or regulatory obligation.

Your personal information will be collected, processed, stored and used by us, and passed to and processed by our subsidiary and/or affiliated companies and other data processors acting under contract with us for four main purposes:

- To register you as a User
- To help students use the website to its fullest potential
- To provide and promote the Website
- To provide customer support
- For research and marketing purposes

We also use your personal information to provide emailed communications. We will retain your personal information only as long as is necessary for the purposes to which the User agrees to under this Privacy Policy and any related agreement(s) with us, or as is required by applicable law, and then we will delete it.

8. Email communications

By registering as a User and agreeing to this Privacy Policy, you will receive certain emails from us, namely:

- Updates about new features, products and services we make available on or through the Website
- News about other services and products or information about education around wellbeing that we think will interest Users

Each of the above emails will give you the opportunity of opting-out of receiving future similar communications from us.

In addition, we send emails specifically relating to the usage of the Website to Users, such as emails about forgotten passwords, User and Student account activation, and emails which notify Users that a new report on Student progress is available. These emails are intrinsic to the Website and cannot therefore be specifically opted-out of. Should you wish to stop receiving these emails from us, you must de-register as a User.

Note that we only hold email addresses for Users: we do not send emails to Students.

9. Sharing your personal data

In our capacity as data controller we will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Any third parties will be bound by contractual provisions with us and only have access to personal data to perform the described purposes, and may not use it for other purposes. Further, they must process the personal data in accordance with this Privacy Policy and as permitted by the UK GDPR.

It is possible that some of the computer systems and companies that process your data on our behalf may be based in countries outside the UK. Countries outside the UK may not have as well developed data protection laws to protect your information as those inside the UK, but we will contractually require that personal data which is processed on our behalf is treated in compliance with UK law and this Privacy Policy.

10. Security

We take appropriate technical and organisational measures to guard against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. While no computer system is completely secure, we believe the measures implemented by our site reduce the likelihood of security problems to a level appropriate to the type of data involved. We have security measures in place to protect our User and Student database and access to this database is restricted internally. However, it remains each User's responsibility:

- To ensure no-one else uses the Website while the User's machine is "logged on" to the Website;
- To log off or exit from your Account when not using it; and
- To keep his/her password or other access information secret.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Marketing with third parties

We will not share your data with any third party for marketing purposes.

12. What rights do you have?

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). Once you have made a subject access request we are obliged to tell you whether we process any of your personal data. If so, to provide you with a description of the personal data we hold, the reasons it is being processed, and with whom we share it. To provide you with a copy of the personal data we process in an intelligible form, and (where this is available) to inform you about the source of the data. All Subject Access Requests must be in writing to hello@theliiift.co.uk.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. In order to correct any of the information we hold about you, simply log into your account and make the changes that are required.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact hello@theliiift.co.uk. Please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact hello@theliiift.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14. Complaints

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see contact details section below).

If you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can e-mail us at: hello@theliiift.co.uk.