

Team Teach Ltd

Privacy policy

Team Teach Ltd (**Team Teach, we, us and our**) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you access the Team Teach Connect platform (**Team Teach Connect**), visit our website (regardless of where you visit it from), attend our training courses or provide training courses using Team Teach branding or materials (**Courses**) and tell you about your privacy rights and how the law protects you.

1 Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data.

Team Teach Connect and our website are not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Team Teach Ltd is the data controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy notice or our data protection practices, please contact our DPO using the following details:

Telephone: 07860 845731

Email: david.millard@teamteach.co.uk

Post: FAO David Millard, Team Teach, Second Floor, Longbow House, 20 Chiswell Street, London, EC1Y 4TW.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under annual review. This version was last updated on 6 October 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Team Teach Connect and our website and Course materials may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave Team Teach Connect or our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Where you access the website, Team Teach Connect, or attend a Course delivered by us or by a trainer operating under a licence from us, we will act as a controller of your personal data.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, profession, date of birth and gender. Where you have registered to be a Team Teach trainer, we may also collect details of your nationality and identification documents such as passport or driving licence.
- **Contact Data** includes address, email address and telephone numbers.
- **Course Data** includes details of courses you have attended together with any certifications obtained, any dietary requirements you have notified to us and any relevant disability or healthcare information you have provided to us in order that we can make reasonable adjustments to the Course being provided.
- **Financial Data** includes bank account and payment card details - although we engage with organisations not individuals, we may be provided with payment cards which are in the names of individuals at the organisation.
- **Recruitment Data** where you have applied to be a Team Teach trainer this includes details of your work history, referees, former employers, right to work checks, education history and qualifications checks and identity checks.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use Team Teach Connect, our website, Courses and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Platform or website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

To the extent that any **Special Categories of Personal Data** are collected via our Platform or our website or by a trainer (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, information about your health and genetic and biometric data and is most likely to include information about your health provided so that we or trainers can make adjustments to Courses) it will be for the purpose of you receiving training from us or becoming or continuing to act as a Team Teach trainer. The lawful basis for processing data is for the performance of a contract with you, and the **condition for processing Special Categories of Personal Data under Article 9 UK GDPR** is explicit consent under Article 9(2)(a) UK GDPR. If you would like to withdraw your consent to us holding any Special Categories of Personal Data please inform us and we will action that withdrawal.

We may collect information about criminal convictions and offences provided by you as part of the recruitment process where you are applying to become a Team Teach trainer.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us personal data including your Identity Data, Course Data, Contact Data, Special Categories of Data, Marketing Communications Data, and Recruitment Data (where you are applying to become a Team Teach trainer) by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - a) create an account on Team Teach Connect or our website;
 - b) apply to become a Team Teach trainer;
 - c) request details of our services;
 - d) register for and attend Courses delivered by us;
 - e) subscribe to our service or publications;
 - f) request marketing information to be sent to you;
 - g) enter a competition, promotion or survey;

- h) provide details in response to market research conducted by us or through a third party;
or
- i) give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with Team Teach Connect or our website, we will automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - a) Technical Data from the following parties:
 - i. analytics providers such as Google Tag Manager and HubSpot based outside the UK;
 - ii. advertising networks including social media retargeting based outside the UK; and
 - iii. search information providers such as Google based outside the UK.
 - b) Contact and Financial Data from providers of technical, payment and delivery services such as Arlo based in Ireland.
 - c) Identity and Contact Data from data brokers or aggregators including but not limited to:
 - i. Sprint, Education Company and Databroker based inside the UK; and
 - ii. International Schools Consortium, Australia Schools List and HSE based outside the UK.
 - d) Identity and Contact Data from publicly available sources such as Companies House, the Department for Education and the Care Quality Commission based inside the UK.

How we use your personal data

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

- **Performance of a contract:** where we need to perform the contract, we are about to enter into or have entered into with you.
- **Legitimate interests:** 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. Legitimate interests means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use

your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data unless specifically indicated (for example where you provide us with Special Category Data in relation to a booking for a Course).

You have the right to withdraw consent to marketing communications at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and condition for processing Special Categories of Data
To register you as a user of our services, including to create your user account in Team Teach Connect or our website and to process details of any Courses you have attended or will attend.	a) Identity b) Contact c) Course	a) Performance of a contract with you. b) Article 9 basis for processing special categories of personal data: Article 9(2)(a) UK GDPR: explicit consent.
To register you as a new Team Teach trainer including to create your user account in Team Teach Connect or our website and to undertake any necessary identification and eligibility to work checks, including contacting any referees you have notified to us	a) Identity b) Contact c) Recruitment	a) Performance of a contract with you. b) Article 9 basis for processing special categories of personal data: explicit consent under Article 9(2)(a) UK GDPR.
To process and deliver our services including: a) Providing our Courses.	a) Identity b) Contact c) Course	a) Performance of a contract with you.

<p>b) Managing payments, fees and charges.</p> <p>c) Collecting and recovering money owed to us.</p>	<p>d) Recruitment</p> <p>e) Financial</p> <p>f) Marketing and Communications</p>	<p>b) Necessary for our legitimate interests (to recover debts due to us).</p> <p>c) Article 9 basis for processing special categories of personal data: explicit consent under Article 9(2)(a) UK GDPR.</p>
<p>To manage our relationship with you which will include:</p> <p>a) Replying to requests for information.</p> <p>b) Notifying you about changes to our terms or privacy policy.</p> <p>c) Asking you to leave a review or take a survey.</p>	<p>a) Identity</p> <p>b) Contact</p> <p>c) Profile</p> <p>d) Marketing and Communications</p>	<p>a) Performance of a contract with you.</p> <p>b) Necessary to comply with a legal obligation.</p> <p>c) Necessary for our legitimate interests (to keep our records updated and to study how potential customers use our services).</p> <p>d) Article 9 basis for processing special categories of personal data: Article 9(2)(a) UK GDPR: explicit consent.</p>
<p>To send you notifications on Team Teach Connect or via email containing information about our services and information about your account (where you have registered an account with us).</p>	<p>a) Identity</p> <p>b) Contact</p> <p>c) Profile</p>	<p>a) Necessary for the performance of the contract with you for the operation of your account.</p> <p>b) Necessary for our legitimate interests to ensure that you receive an appropriate level of service.</p> <p>a) Article 9 basis for processing special categories of personal data: Article 9(2)(a) UK GDPR: explicit consent.</p>
<p>To provide our services, including for you to be able to update Team Teach Connect with details relating to the services you have received from us.</p>	<p>a) Identity</p> <p>b) Contact</p> <p>c) Profile</p> <p>d) Course</p>	<p>a) Performance of a contract with you.</p> <p>b) Article 9 basis for processing special categories of personal data: Article 9(2)(a) UK GDPR: explicit consent.</p>
<p>To monitor and record telephone calls and interactions between you and us.</p>	<p>a) Identity</p> <p>b) Contact</p>	<p>a) Necessary for our legitimate interests (to improve the service we deliver).</p>

	<ul style="list-style-type: none"> c) Course d) Financial 	
To administer and protect our business, Team Teach Connect and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). b) Necessary to comply with a legal obligation.
To deliver relevant Platform and website content and marketing information (including advertisements and details of Courses) to you and measure or understand the effectiveness of the marketing information we serve to you.	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our Platform, website, services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> a) Technical b) Usage 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (to define types of customers for our services, to keep Team Teach Connect and our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about services that may be of interest to you.	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (to develop our services and grow our business).
To publish your reviews on our website, including reviews	<ul style="list-style-type: none"> a) Identity (where you have 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests in publishing reviews

provided directly by you to us or published on third party websites including Google.	provided this information)	submitted in respect of our services.
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Marketing

We provide you with choices regarding certain personal data uses, particularly around marketing and advertising undertaken by us and our group companies.

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, expressed an interest in our services or registered with or provided your details to us via Team Teach Connect or on our website, or received services from us, and you have not opted out of receiving that marketing.

Third-party marketing

Where you are an individual, we will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Where you are a business, we will share your business email address with third parties within our group of companies for marketing purposes where you have expressed an interest in our services or where you have received services from us on the basis of our legitimate interest in developing the services provided by our group.

Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience or other transactions.

Cookies

Team Teach Connect and our website use cookies to distinguish you from other users of Team Teach Connect and our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. This helps us to provide you with a good experience when you browse Team Teach Connect and our website and also allows us to improve Team Teach Connect and our website.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of Team Teach Connect and our website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.teamteach.co.uk/policies-procedures/cookie-policy/>.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below:

- a) Other companies in our group and who are based inside and outside of the UK and provide administration services and undertake group reporting.
- b) Service providers acting as processors based inside and outside of the UK such as HubSpot, Inc. and who are based in the USA who provide IT and system administration services, including in relation to the Team Teach customer relationship management system.
- c) Third party trainers for the purpose of delivering Courses to you.
- d) The organisation which employs, will employ or has employed you where we are sharing details of Courses you have attended or are to attend.
- e) Where you are applying to become a Team Teach trainer we may share your personal data with other third parties based inside and outside of the UK who assist us with:
 - conducting employment reference checks;
 - conducting qualification checks;
 - carrying out criminal convictions checks (as required); and
 - verifying details you have provided from third party sources.
- f) Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- g) HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- h) The British Institute of Learning Disabilities (**BILD**) with which we share information relating to BILD certified trainers and organisations.
- i) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Many of our external third parties are based outside the UK, including: (i) Hubspot, Inc who are based in the USA and store data in Germany; (ii) Arlo who are based in Ireland; and (iii) Go1 Pty Limited who are based in Australia so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to:

- **Request access to your personal data** (commonly known as a **data subject access request**). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data** This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time where we are relying on consent** to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Privacy Policy – Australian Addendum

This addendum to the privacy policy applies to individuals located in Australia. The terms set out in this Australian Addendum are in addition to the terms set out above in the remainder of the privacy policy. In the event of any conflict or inconsistency between the remainder of the privacy policy and the terms of this Australian Addendum, this Australian Addendum shall govern and prevail.

Definitions

All references to ‘personal data’ in the privacy policy are to be interpreted as a reference to personal information. Personal information has the meaning set out in the Australian Privacy Act 1988 (Cth) (**Privacy Act**).

All references to **Team Teach, we, us** and **our** in the privacy policy are read to include reference to TTAP Pty Ltd. TTAP Pty Ltd is Team Teach’s Australian company and the company which will collect your personal information.

Compliance with the Privacy Act

Notwithstanding any other obligations in this privacy policy, we will comply at all times with the Privacy Act with respect to all personal information collected from individuals in Australia.

We collect your personal information for the purposes set out the privacy policy. If you do not provide us with your personal information we may not be able to provide you with our services or allow you to provide services on our behalf.

Collection, use and disclosure

We may collect and use your personal information for the purposes described in this privacy policy.

We do not generally require you to disclose any sensitive information (e.g. details of race, religious belief, sexual orientation or membership of a trade union) to us. If you do provide us with sensitive information for any reason, you consent to us collecting that information and using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

Overseas disclosure

We may disclose your information to third parties (including to our related companies or third parties who provide goods and services to us). Some of these third parties are located in the United Kingdom, Europe and the USA. We will take reasonable steps to ensure that such overseas recipients do not breach the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) in relation to such information.

Questions, Comments or Complaints

If you have any questions, comments or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this privacy policy (including Australian Addendum) or the Privacy Act, please contact us at dataprotection@teamteach.com.au.

We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.