

Privacy Notice - Sumdog

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

- To create a Sumdog user accounts (pseudonymised details)
- To support the learning and teaching of students
- Relevant staff in schools using Sumdog would be registered with a legitimate interest to support learning and teaching of their pupils

Your information is:

Being collected by Aberdeenshire Council
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The Legal Basis for collecting the information is:

Personal Data	Special categories of personal data
Consent	The data subject has given explicit consent to the processing
Performance of a Contract	Processing is necessary for the purposes of carrying out the obligations of the controller or of the data subject in the field of employment, and social security and social protection law
Legal Obligations	Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
Vital Interests	Processing relates to personal data which are made public by the data subject



From mountain to sea

Task carried out in the Public Interest	X*	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity	
Legitimate Interests ¹		Processing is necessary for reasons of substantial public interest	
		Processing is necessary for legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with its connections with its purposes and that the personal data are not disclosed outside that body without the consent of the individuals	
		Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems	
		Processing is necessary for reasons of public interest in the area of public health	
		Processing is necessary for archiving purposes in the public interest , scientific or historical research purposes or statistical purposes	

Please tick all that apply

*The lawful basis for processing is public task 6.1.e.



From mountain to sea

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

Please detail the consequences of failure to provide the information or state "Not applicable".

Not applicable.

Your information will be shared with the following recipients or categories of recipient:

Please list recipients or categories of recipient here or state "Not applicable"

To use Sumdog, pupil data will be pseudonymised so that personal information is not entered into the product and shared with Sumdog. Schools will give every pupil using Sumdog a pseudonymised name. They will not use anything which identifies the pupils e.g. part of name, initials/surname, first name, etc. Instead, they will use something completely random such as horse, dog, cat. For example, Aaron Anderson could be *Tiger 1*. They will record every pupil's name alongside their pseudonymised name in an excel spreadsheet, password protected with only two members of staff having access in order to maintain accounts etc. **When sending pupil data to Sumdog (to allow Sumdog to set-up pupils accounts) schools will only send the pseudonymised pupil names.**

Data subjects are school pupils and Aberdeenshire Council employees. School staff will register pupils on their behalf with pseudonymized usernames. Removal or withdrawal of accounts can take place at any time, if requested. Data relates to children's in-app progress in Maths, spelling and grammar.

The processing is not novel, and security is kept up to date.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Please list any countries to which the data will be transferred and stored or state "Not applicable". Where data is transferred abroad, details of the safeguards in place must be stated e.g. Privacy Shield compliant organisation, Country deemed "Safe" by European Commission, etc.

Although Sumdog Ltd is based in the UK, some of its sub-processors process data out with the UK. As of 17 April 2023 Sumdog have completed the move of all data, including that stored by sub-processors, to the UK/EU. Sumdog has provided confirmation of whether data is held by each sub-processor and the service is satisfied that all are based in the UK/EU.



From mountain to sea

The retention period for the data is:

Please state the retention period(s)

On an annual basis, class teachers update their classes. Any school leavers are placed in 'Students no longer in my school' folder. These accounts are deleted after 6 months, so pupils can move their accounts to a new school or have their parents create a family account.

On an annual basis, Heads review teacher accounts. They add any new teachers and remove any leavers.

Sumdog will delete inactive accounts after 12 months, giving notice and the opportunity to keep accounts if desired. Schools have the option to contact support@sumdog.com if they would prefer accounts to be deleted sooner.

The following automated decision-making, including profiling, will be undertaken:

Please detail any automated decision-making or profiling that will take place or state "Not applicable".

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to object, where the legal basis specified above is:
 - (i) Performance of a Public Task; or
 - (ii) Legitimate Interests.
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.