

Privacy policy

1. SCOPE

Satchel ('Satchel', 'we', 'us') takes the protection of privacy very seriously. This notice describes how we collect, use, and handle your personal data. It also describes your data protection rights, including a right to object to some of the processing which Satchel carries out. More information about your rights, and how to exercise them, is set out in the 'Your rights?' section below.

This notice applies to the information Satchel collect from parents, teachers and students when they use our Satchel Pulse tool. It also covers personal information collected on the website <https://www.satchelpulse.com/>, and Satchel apps in the US are run by Satchel.

Your school will be the data controller for the personal data which is hosted in Satchel Pulse. For more information on how this personal data is processed, please speak to your school or refer to their privacy notice.

2. WHO WE ARE

We are Satchel, our flagship product, Show My Homework, was launched in 2011 by former assistant head teacher, Naimish Gohil, who had a vision to transform the way homework and technology was approached in schools. Our software is now used in over 1 in 3 secondary schools in the UK and in 23 countries across the world, making a difference to the lives of millions of students and parents.

The website <https://www.satchelpulse.com/>, and Satchel apps in the UK are run by Satchel.

3. WHAT INFORMATION DO WE COLLECT?

We collect and process the following information:

- your first name;
- your last name;
- your email address;
- your mobile number (which is optional);
- your marketing preferences, including any consents you have given us;

- Information you provide in enquiry forms; and
- information related to the browser or device you use to access our website.

Sometimes, we receive information about you from third parties. This includes information from your school, but also in the case of teachers or other school staff, information from publicly available sources such as LinkedIn and in some cases obtaining information (such as email contact lists) from data suppliers. In particular we obtain information for students, teachers or other school staff through SIS.

4. HOW DO WE USE THIS INFORMATION?

We process this data for the following purposes:

To fulfil a contract, or take steps linked to a contract including:

- To provide Satchel Pulse and our website, and ancillary services such as customer support.
- To authenticate users of Satchel Pulse.
- Taking payments for the purchase of Satchel software licences or Satchel's online digital content.
- To send you service, technical and other administrative emails relating to Satchel Pulse and our website, messages and other types of communications, like two factor authentication and resetting your password.

As required by Satchel to conduct our business and pursue our legitimate interests, in particular:

- To ensure Satchel Pulse and our website is working as intended, such as tracking outages or troubleshooting issues that you report to us.
- To make improvements to Satchel Pulse and our website and to help us develop new products and services.
- To respond to enquiry forms that you complete on our website.
- We use data for analytics and measurement to understand how Satchel Pulse and our website is used. For example, we analyse data about your use of Satchel Pulse to do things like optimise product design. This information can consist of information such as geographical location, browser type, referral source, length of visit, pages viewed and phone make and model.
- We use information you provide to investigate any complaints received from you or from others, about Satchel Pulse, our website or other services.

- For direct marketing purposes including creating a profile about you to better understand you and tailor the marketing we serve you (including on social media). This may include information about Satchel Pulse or information about our other products and services. In the event we create a profile for students this will be for supporting authorized educational/school purposes or as authorized by the parent/student.
- We will use information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).
- To conduct surveys and other market research to ensure our services are relevant to your needs.

Where you give us consent:

- where required by law to send you direct marketing in relation to our services;
- we place cookies and use similar technologies. See our [Cookie Policy](#); and
- on other occasions where we ask you for consent, we will use the information for the purpose which we explain at that time.

In accordance with the [Student Privacy Pledge](#) ('Pledge') we do not collect, maintain, use, or share student personal information beyond that needed for authorized educational/school purposes, or as authorized by the parent/student.

For purposes which are required by law:

- In response to requests by government or law enforcement authorities conducting an investigation.

5. DISCLOSURE

Vendors and service providers. We will share your personal information with third party service providers who support our business, who will process it on behalf of Satchel for the purposes identified above. Such third parties include providers of hosting services and technical infrastructure CRM services, customer support services, and marketing services. Some of our key service providers are listed below:

Vendor	Purpose
Hubspot / based in the United States	Marketing automation / company updates / product inform
EmailOctopus / based in England	Marketing automation / company updates / product inform
Amazon Web Services (AWS) / based in Ireland	Product Database (including personal data from school MIS
Salesforce / based in Ireland	Key school contact database / support ticketing system (incl information) / product information / marketing database
New Voice Media / England	Call recording software for training and quality purposes
Stripe / Ireland	Online payment provider
Zapier / United States	Marketing automation
Intercom / United States	Customer engagement and support tool

Legal reasons. We may be required to share personal data with third parties when (i) required by law (ii) requested by a regulator and (iii) necessary for fraud and data error investigations.

Group companies. We may share your information with our group of companies for the purposes of business administration, maintaining security and regulatory compliance, providing support services to end users (including IT support, where relevant), marketing and analytics.

Your school. When you access or use our services in the course of working for your school, we may share your information with such organisation in certain circumstances.

Business transfers. In the event that Satchel undergoes any reorganisation, restructuring, merger, sale, or other transfer of assets your information will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to any new owners of the business.

In accordance with the Pledge we will request that third parties and companies operate in a manner consistent with Pledge principles or allow users a choice for information to not be disclosed to that specific entity.

6. INTERNATIONAL TRANSFER

In connection with the purposes identified above, your personal information may be transferred outside the United States including to the UK and the European Economic Area ('EEA').

7. RETENTION

For data which is hosted in Satchel Pulse: As noted above, Satchel is not a Data Controller for personal data hosted in Satchel Pulse. Therefore as a Data Processor, we delete this data on the instruction of your school.

Satchel will, pursuant to the school instructions, process and store personal data for students, parents, teachers and school staff members for the duration of the schools license with Satchel. If you leave the school during an active license with your school we will delete/anonymise your personal data within 28 days of your account being deleted by your school.

If you are a parent of children at two different schools which use Satchel, if one school requests that Satchel delete its data your details will still be held by Satchel for the second school.

For data which is listed in section 3 above:

For non-Satchel users (such as prospects and business contacts) we will process and store personal data while we are in contact with you with relevant information on our services. If we have not contacted you for a period of 1 year your data will then be removed from our system automatically.

If you have opted out to your data being processed we will delete your data within 28 days of your opt out being received. Sometimes business and legal

requirements oblige us to retain certain information, for specific purposes, for an extended period of time. Reasons we might retain some information for longer periods of time include security, fraud prevention, financial record-keeping, complying with legal or regulatory requirements.

8. YOUR RIGHTS

Where required by applicable law or regulation, you have the right to **ask us for a copy** of your personal information; to **correct, delete** or **restrict** (stop any active) processing of your personal information; and to obtain the personal **information you provide to us for a contract or with your consent in a structured, machine readable format**, and to ask us to **share (port) this information to another controller**.

In addition, you can **object to the processing** of your personal information in some circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the information for direct marketing). These **rights may be limited**, for example if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights - or get a copy of our legitimate interest balancing tests - you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to an information protection authority where you live, work or where you believe a breach may have occurred.

For the provision of information marked as mandatory when you register to use Satchel Pulse, if such information is not provided, then you will not be able to use the service. All other provision of your information is optional. If you do not provide such information, our provision of certain services to you may be detracted from.

9. CONTACT DETAILS

Our Data Protection Officer and data protection representatives can be contacted directly here:

By email: DPO@teamsatchel.com

By Mail: Data Protection Officer, 111 8th Ave, Fl13, New York, NY 10011,
United States of America