

OUR POLICIES

United Kingdom

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Who we are

pixevety operates as a secure, privacy consent-driven media management platform solution for schools & Educational Establishments. Our platform offers strict default privacy enhanced technology which can securely process children’s personal data and face biometric data with enhanced data protections at its core ensuring compliance with UK GDPR.

pixevety is a company registered in Australia/ incorporated in Australia (ABN 64 160 684 677) whose registered office is at 7/122-126 Old Pittwater Road, Brookvale, Sydney NSW 2100.

Our UK office Address is:

Unit 34 The Business Exchange
Rockingham Road Kettering NN16 8JX
United Kingdom

pixevety is a registered Data Processor with the UK Information Commissioner's Office (ICO) registration no: ZB668244.

See our existing policies for other regions: <https://cdn.pixevety.com/docs/privacy-policy.pdf>

Definitions

DPA	Is the Data Protection Act 2018 and UK GDPR.
Personal Data	Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
Data Controller	Data Controller means the natural or legal person who determines the purposes for which and the manner in which any personal information are, or are to be, processed. <ul style="list-style-type: none">• For the purpose of this policy - the Controller is likely to be a School or Educational Establishment (EE).
Data Processor	Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. <ul style="list-style-type: none">• For the purpose of this policy - pixevety operates as a Data processor under contract to a Controller entity.
Data Subject	Data Subject is any living individual who is using our Service and is the subject of Personal Data. <ul style="list-style-type: none">• For the purpose of this policy – the data subjects are the children, students, parents, administrators and staff of the school/EE.
Service	Service is all websites, apps, and integrations provided by us including, but not limited to, the pixevety Platform, AWS Rekognition and Salesforce.
Usage Data	Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself – such as volumes and capacity data.

Cookies	Cookies are small pieces of data stored on your device (computer or mobile device). For the purpose of this policy cookies used are for the following purpose: (1) Application authentication cookies - AspNet Core Identity, AntiForgery, SAML SSO. (2) Salesforce Live Chat cookies.
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Data protection principles

Pixevety Ltd is committed to processing data in accordance with its responsibilities under the DPA. As a digital media management processor of school media (including but not limited to photos and videos) and face biometric processor of school photos for the real-time application of photo consent in a School/EE's media gallery, **pixevety** offers the Controlling School/EE the confidence to ensure processing meets the hallmarks of strengthened data protection principles.

Children's Data processing

- **pixevety** ensures compliance with all the requirements of the UK GDPR specifically related to children data processing. We design our processing with children in mind from the outset and use a data by protection by design and by default approach.
- As a processor, **pixevety** acts specifically on the instruction of the Controller School/EE to ensure the strictest controls and protections are in place to meet processing of data for children. Therefore, we can put in place appropriate actions to enforce age restrictions within our systems.
- **pixevety** digital systems enable competent children to exercise their own data rights.
- **pixevety** offers a unique digital consent-based media management service whereby we work with the school/EE to ensure the child understands what they are consenting to, and their parents are engaged in the consent notification process whereby the balance of control lies with the parent/child as an overriding objective. We issue privacy notices and undertake internal DPIA's specific to a school's requirements to assist their confidence in the data processing system for control.
- We design our systems and processes to enable a child to exercise their data protection rights at any time and to make the process easy to understand and accessible.
- We design our systems so that personal data can be erased and removed where consent is withdrawn.

pixevety does not engage in:

- Profiling – our use of cookies are only necessary cookies in order to make our service function and operate properly. We do not use analytics or personalisation cookies for children, nor do we engage in tracking or monitoring cookies.
- Automatic decision-making processes.
- Marketing of children's data or advertising influences/behavioural aspects.
- Use of our secure platform will never link to other third-party sites or services.

Key Data Protection principles

pixevety processing ensures that personal data complies with the DPA and will be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

General provisions

- a. This policy applies to all personal data processed by **pixevety** on behalf of a controlling School/EE entity.
- b. **pixevety** Data Protection Officer shall take responsibility for the **pixevety**'s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

Lawful, fair, and transparent processing

- a. **pixevety** ensures its processing of data is lawful, fair, and transparent, **pixevety** maintains an Asset Register for Data Processing Systems.
- b. The Record of Data Processing Systems shall be reviewed at least annually (commonly known as a ROPA).
- c. Individuals have the right to access their personal data and any such requests made to the Processor or Controller shall be dealt with in a timely manner under the Subject Access Request provisions.

Lawful purposes

- a. All data processed by **pixevety** must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. **pixevety** will note the appropriate lawful basis in their Record of Data Processing Systems, within its privacy notice, within its DPIA.

- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent will be retained within the systems processing personal data.
- d. **pixevety** systems and processes enable data subjects who have provided their consent, the option to revoke their consent. This is clearly available in our systems and in place to ensure such revocation is reflected accurately and enabled.

Data minimisation

- a. **pixevety** ensures that personal data are adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- b. The Controller determines the data to be processed and **pixevety** as a Processor acts specifically in accordance with those instructions.

Accuracy

- a. The Controller shall take reasonable steps to ensure personal data is accurate for which **pixevety** processes.
- b. Where necessary for the lawful basis on which data is processed, the Media Management platform which **pixevety** operates has in place procedures to ensure that personal data is kept up to date and correct.
- c. Where a subject access request is made, **pixevety** will work with the Controller entity to ensure relevant updates are expedited as part of business-as-usual processes but no longer than the statutory time limits for update.

Archiving/removal

- a. To ensure that personal data is kept for no longer than necessary. **pixevety** will follow all retention requirements as set out by the Controller to ensure data is not retained longer than required. **pixevety** shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why as determined and instructed by the Controller.

Security (integrity & confidentiality)

- a. **pixevety** ensures that personal data is stored securely using latest security software that is kept up to date. This includes cyber protections to the processing of data.
- b. Features supporting security provisions include, encryption, robust password controls, firewalls, and secure access controls which are continually updated and reviewed.
- c. Access to personal data is strictly limited to personnel who need access and appropriate security are in place to avoid unauthorised sharing of information. Strict access and permission controls operate within our systems to ensure privacy is maintained and upheld.
- d. When personal data is deleted, this can be done safely such that the data is irrecoverable.

- e. Appropriate back-up and disaster recovery solutions are in place for our systems.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, **pixevety** will promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

What data do we collect

pixevety will process a combination of personal data and special category data for individuals/School Administrators/parents/children.

This will include;

- Identity data including name, images, photo, and video images contained within school media galleries, including face biometrics via the activation of automatic facial recognition technology (AFRT) where consent is provided and AFRT is switched on in the school media gallery.
- Contract Administration data includes billing data, address, email, and phone numbers between the School/EE and **pixevety**.
- Financial transaction data includes bank account and payment card details between the School/EE and **pixevety** for the service procured.
- Usage data includes volumes and account details of users including School/EE Administrators/parents.

Where special category data is processed by **pixevety**, we ensure the strictest technical protections are in place for security controls and access. We support the Controllers obligations such as having appropriate policy documents in place.

How we collect and use information from children

On instruction from a School/EE who operate as a Controller of the data. **pixevety** will agree the processing obligations between the parties by way of a contractual agreement. A secure platform with strict privacy and security defaults is the standard offering.

An onboarding approach will be part of the set-up process between the School/EE and **pixevety**. A school gallery set up/registration will include:

- Training for the relevant school/EE restricted users and delegated authorities and administrators including account management and set up for school galleries.
- Uploading of digital media collections into the privacy enhanced technology consent-based solution which will include the issue of consent links/parent notification forms and privacy notices.

ACCOUNT SET-UP AND MAINTENANCE

We process information collected from parents during the registration process and in member record configuration of the School Gallery, when requested by the school, in the following manner:

- To create and maintain the Child's student member record in the platform;
- To create and maintain a Parent's **pixevety** account.

WHAT INFORMATION SUBMITTED BY CHILDREN IS VIEWABLE ON THE SITE?

The platform is a strictly private platform for the School as a Controller of the processing. The school is responsible for setting up its members (staff/students) records, user connection accounts, user roles, member consents, and folder/album access. Dependent on the access and media permission settings set by the school, and the individual member (staff/student), we securely limit the personal information that is viewable about a Child related to their photos.

If a child's photo permissions reflect a Do Not Publish set-up, only the School Administrator and the parents of that child will be able to access their photos.

HOW DO WE GET PARENTAL CONSENT WHEN WE ARE REQUIRED TO DO SO?

Where parental consent is required in respect of our use of a Child's personal information, when setting up a student's member record in the platform, the Controller School/EE will contact the Child's parent to ask for their consent as required – we also explain to the parent:

- what personal information the School/EE seeks to collect about their Child - with a Parent Notification Form.
- how the School/EE use it and why; and – with a specific Privacy notice.
- how the parent can revoke their consent and/or ask that we delete their Child's personal information - detailed within the Privacy Notice.

If at this stage, the parent gives the School/EE their consent, we will carry out the activity for which that consent was required. If not, we won't.

HOW MAY PARENTS ACCESS, CHANGE OR DELETE INFORMATION ABOUT THEIR CHILDREN?

Deleting your Children's information.

Where a parent provides consent to the School/EE for certain processing of their Children's personal information, the parent can request:

- The School/EE to cease collection of personal information from their children; and/or
- For the Children to no longer participate as members of the platform.

The school/EE/**pixevety** will delete a Child's record, and any parental contact information we may hold, on request.

ACCESSING OR CHANGING CHILDREN’S ACCOUNTS AND ANY PERSONAL INFORMATION COLLECTED ON THE PLATFORM

Parents may at any time:

- access or make changes to their Children’s student record in the platform; or
- make changes to the personal information that the School/EE have collected about their Child

by contacting the School/EE/[pixevety](#) directly.

HOW MAY PARENTS RAISE OTHER QUESTIONS OR CONCERNS?

We take privacy seriously. If you have a question about how we collect and handle your personal information or a complaint about a breach of privacy made by Pixevety Ltd, please contact us at:

Email: privacy@pixevety.com

Our legal basis for processing data

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

- (a) Where we need to perform the contract we are about to enter into or have entered into with the relevant School/EE;
- (b) Where it is necessary for our legitimate interests for the security of our systems;
- (c) Where we rely on Consent as the basis for which our Media Management service provided to the School/EE.

We have set out below, a description of all the ways we process School/EE personal data, and which of the legal bases we rely on to do so.

Purpose	Examples of how we use relevant Personal Data for a Purpose	Our legal basis for this use of data
Account set-up and Maintenance and support	To register a Parents account on the Sites, and to provide the core elements of the Media Gallery	Contractual Necessity
Administration & Troubleshooting, network security of our service and Service improvements	We might use the information associated with issues that might be occurring on our Sites and systems, or to test and improve them/address technical issues	Contractual & Legitimate Interests. It is in our legitimate interests to ensure the proper operation of our

		Sites and associated systems and services.
User submitted content	As part of the digital platform School gallery, we host the content submitted to the platform by Children/Parents/School Administrators To provide customer support	Contractual Necessity in respect of submitted content.
Media Management data for images and pictures of children/students/school Administrators	Children/Student/School Administration teams creation of a school media gallery for upload of images, pictures and photographs	Consent The basis of the Pixevety service offers a secure consent based digital offering ensuring GDPR principles of processing are preserved and implemented.

International transfers

Some of our Third Parties sub-processors may be based outside the UK. Where this is the case, **pixevety** complies with International Data Transfer Agreements (IDTA's) as part of contractual obligations to ensure a similar UK GDPR compliant degree of data protection is applied to the processing. Our significant supplier AWS Rekognition as a Global service provider provides our service primarily from the UK as a chosen hosting location. In addition, AWS comply with the US/UK Data Privacy Framework and have a specific UK extension in place for data protection. Similarly, we rely on Salesforce for our live chat service with Schools and as a global service, they comply with the US/UK Data Privacy Framework with a UK extension for data protection compliance.

Security of data processing

pixevety have put in place appropriate security measures to prevent personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. We use encryption to transfer information between your device, our servers, and the Media School Gallery. All data is encrypted 'at rest'. This means the data stored on our systems has been encrypted. In addition, we limit access to your personal data to those School Administrator who control the platform content and have a requirement to administer the content. **pixevety** will only process your personal data on instructions from the Controller School/EE 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 the School/EE and any applicable regulator of a breach where we are legally required to do so.

Retention

For Schools

We only retain personal data within our systems for as long as necessary as determined by the Controller who own and control the relevant data. The Controller determines the appropriate retention period applicable, and our systems apply that retention control setting as required by the School/EE.

Our systems allow deletion of personal data, associated with media galleries and deletion of accounts are an aspect of service for which local School administrators can apply as required.

For Pixevety Administration

pixevety will retain contract data for a period of up to 6 years after contract end.

Data protection rights for data subjects

A parent/child/student can at any time make these requests (which are also known as Subject Access Rights and have legal standing for a timely response and action to be undertaken).

pixevety ensures (in collaboration with a Controller) it will support and enable the following data protection rights:

- **The right to access, update or to delete the information we have on data subjects.** This can be enabled directly within the account settings section of the media gallery operated by the School/EE. pixevety will support this process where required.
- **The right of rectification.** The right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** The right to object to a School/EE's processing of the Personal Data.
- **The right of restriction.** the right to request that the School/EE restrict the processing of the personal information.
- **The right to data portability.** The right to be provided with a copy of the information the School/EE holds, in a structured, machine-readable, and commonly used format. This can be achieved by the 'Download my data' within our platform.
- **The right to withdraw consent.** The right to withdraw your consent at any time where the School/EE relied on your consent to process your personal information.

Please note that the School/EE/pixevety may ask for verification of an individual's identity before responding to such requests.

How to exercise these rights:

- The data subject/child/parent may contact the school/EE directly to make their request. The school/EE will often be able to activate all rights within the school media gallery controls. pixevety will support any requests by a School/EE where assistance is required and to ensure confirmation of the obligation has been undertaken within our technical back-end systems.

- **pixevety** Privacy contacts are as follows: privacy@pixevety.com
- *The right to complain.* We would aim to be able to resolve all questions, requests, and complaints about Personal Data directly. However, if a Child or their parent feels we have not been able to satisfactorily resolve an issue, they may contact: The Information Commissioners Office (ICO) who are the independent regulator responsible for upholding Data Protection rights in the UK.

The contact details are:

Website: [Information Commissioner](#)

Email: icocasework@ico.org.uk

Telephone: 0303 123 1113

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

END OF POLICY.

Last revised: April 2024.