



PRIVACY STATEMENT

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1. Introduction

This Privacy Statement (together with Our terms of use available at <https://www.aladdin.ie/content/terms> (the “**Terms of Use**”)) sets out the basis on which any personal data We collect from You, or that You provide to Us, will be processed by Us. Please read the following carefully to understand our views and practices regarding the personal data we collect and how we will treat it. By visiting <https://www.aladdin.ie/> (“**Our Site**”) contacting us and/or using the Aladdin software (“**Our Services**”) you are accepting and consenting to the practices described in this Privacy Statement.

We may update this Privacy Statement from time to time and will post any changes on Our Site so it might be a good idea to come back and read through it again, from time to time. This Privacy Statement was last updated in April 2018

2. Who Are We?

Any reference to “**We**”, “**Us**” and “**Our**” is to Cloudware Limited t/a Aladdin Schools, with registered address at Aladdin, First Floor, Block 1, Deansgrange Business Park, Co. Dublin, Ireland.

For the purpose of the Data Protection Act 1988 & 2003 (the “**Act**”), in providing Our Services, We act as data processors who process information on behalf of primary schools (the “**School**”) who are the data controllers for the purposes of the Act. The School allows us to process your information in connection with the School’s use of Our Services. It is the responsibility of the School to determine how your information is processed by us and we will follow the School’s instructions at all times. You should refer to the privacy statement of the School for further information as the School determines the purpose for which your information will be processed in connection with Our Services.

3. Who Does This Privacy Statement Apply To?

This Privacy Statement applies to any person whose information we process on behalf of the School and who would be considered a data subject for the purposes of the Act. References to “**You**” and “**Your**” shall include School staff (both current and past), School pupils (both current and past) and their family, applicants for placement at the School and parents/guardians of children.

4. What Information Do We Collect From You?

The information that we collect about you includes:

1. **General Data** – This is information that you may give us or the School by correspondence by phone, e-mail or otherwise. This includes information you provide when you use Our Site, Our Services and when you report a problem or receive support services in connection with Our Site and/or Our Services. The information You give Us may include but is not limited to the following information that We process on behalf of Schools:
 - your name, address, email address and phone number;

- information relating to staff and teachers who use Our Site and/or Our Services including (but not limited to) their name, address, email address and phone number;
 - information relating to children who are connected with the School, including (but not limited to), name, address, contact information (including emergency contacts), date of birth, ethnic origin, religion, nationality, photographs, medical information, family history, performance, evaluation, punctuality and attendance information; and
 - Information relating to parents or guardians of those children including (but not limited to) their name, address, contact information, and ethnic origin.
2. **Technical Data** - We may collect the following technical information on behalf of Schools:
- technical information, including the Internet protocol (IP) address used to connect Your device to the Internet, Your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - information about Your visit to Our Site or use of Our Services, including the full Uniform Resource Locators (URL) clickstream to, through and from Our Site and Our Services (including date and time log); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call Our customer service number.

5. What Do We Do With Your Information?

We may use the information collected in the following ways:

1. **General Data** - We will use this information on behalf of the School to:
- carry out Our obligations arising from any contracts entered into between Us and the School, including the Terms of Use, and to provide the products and services requested from Us;
 - Send communications to you about Our Site and/or Our Services including by SMS and push notification. We cannot guarantee that you will receive all communications from us and we shall not be liable in the event that you do not receive such communications. You can opt out of receiving such communications by contacting us using the details below;
 - make notifications about changes to Our Services; and
 - Ensure that content from Our Site is presented in the most effective manner.

If any sensitive personal data is collected (i.e. data relating to racial or ethnic origin, political or religious opinions, membership of a trade union, physical or mental health or condition or sexual

life, the commission of any offence or related documentation) then You consent to Our processing this data in the manner set out in this Privacy Statement for and on behalf of the School. We do not control nor do we have any input into the content and information submitted to Our Site and Our Services, the School is responsible for ensuring that all appropriate consents are in place to allow us to process the information on the Schools behalf.

2. **Technical Data** - We will use this information on behalf of the School to:

- administer Our Site and Our Services and for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- provide information to Schools;
- to improve Our Site and Our Services and to ensure that content is presented in the most effective manner for You and for Your device;
- to allow You to participate in the interactive features of Our Service, when You choose to do so; and
- As part of our efforts to keep Our Services and Our Site safe and secure.

6. Disclosure of Your Information

We may share your personal information with any member of our group, which means our affiliates and subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act (Ireland) 2014.

We will take every care to protect your information and use it in accordance with the Schools instructions. In certain circumstances we may disclose it to certain third parties as follows:

- the School;
- business partners and sub-contractors for the performance of any contract We enter into with them in connection with Our Site and Our Services including; payment processors and hosting service providers;
- at the Schools request, We may disclose the information or receive information about You with government departments including with respect to the Primary Online Database run by the Department of Education and Skills;
- We may disclose the information relevant to any backup or hosting services to Google Inc. You can read more about the measures taken by Google to protect the security of their services and the information at: <https://cloud.google.com/security/compliance>.
- Analytics and search engine providers that assist us in the improvement and optimisation of Our Site. This consists of aggregated anonymous information only and relates to the web pages visited on Our Site and not the information included on those web pages;

- if We or substantially all of Our assets are acquired by a third party, in which case personal data held by Us will be one of the transferred assets;
- if We are under a duty to disclose or share Your personal data in order to comply with any legal obligation, or in order to enforce or apply the Terms of Use and other agreements; and/or
- To protect our rights, property, or safety, or that of the School, You or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

7. Safe Guarding Your Personal Data

The information processed by us, on behalf of the School, may be transferred to, and stored at our hosting centres in the European Union. By submitting your personal data, you and the School agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that the information is treated securely, in compliance with the instructions of the School and in accordance with this Privacy Statement and the relevant law. In particular, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we manage on behalf of Schools and the information we collect and manage on their behalf.

All information processed by us is stored on Google's secure servers. To protect the privacy and security of Our Services, We will also take reasonable steps to verify your identity before granting access to information. We also use secure connections to protect sensitive information during its transmission. Where you have been given (or where you have chosen) a password which enables you to access Our Services, You are responsible for keeping this password confidential. We ask you not to share your password with anyone.

You should be aware that when you disclose personal information that information is available to the School and may be used by the School. Schools are solely responsible for the uses made of your information and we have no responsibility for the actions of the Schools in this regard.

You should contact the School in the event that your information needs to be updated or changed, for example in the event that your contact details have changed. We shall not be responsible for any failure of the School to contact you, including where you have not provided the correct contact details.

If you have provided information to the School You understand that we process that information as an agent of the School. We may hold a back-up copy of the information that you submit, but only on behalf of the School. If you wish to modify or otherwise deal with your personal information submitted directly to us then you should contact the School directly, as they have responsibility for that personal information. We will comply with the School's instructions in respect of that personal information. If you wish to understand the School's data protection or privacy statement with regards to the dealings that it has with your personal information then you should contact the School directly to establish such terms.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to Our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Cookies

Our Site uses cookies to distinguish you from other users of Our Site. This helps us to provide you with a good experience when you browse Our Site and also allows us to improve Our Site. For detailed information on the cookies we use and the purposes for which we use them see Our Cookie policy <https://www.aladdin.ie/cookies.html>.

You can set your browser not to accept cookies. If you go to <https://www.aladdin.ie/cookies.html> it will tell you how to remove cookies from your browser. However in a few cases some of the features of Our Site may not function as a result.

9. Your Rights

Our site may, from time to time, contain links to and from third party websites including the website of the School. If you follow a link to any of these websites, please note that these websites have their own privacy statements and that We do not accept any responsibility or liability for these third party websites. Please undertake the appropriate due diligence before submitting any personal data to these websites.

10. Access to Information

The Act gives you the right to access information held about you by the School. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee determined by the School to meet the costs in providing you with the information held about you. You should contact the School directly in connection with any such access request.

You have a right to have your information rectified or erased free of charge if it is inaccurate or no longer required by us or the School for the purpose for which it was collected. You can do this by contacting the School directly.

11. Disclaimer

WE ARE NOT LIABLE TO YOU OR THE SCHOOL IN RESPECT OF ANY CLAIMS, LOSSES, DAMAGES, EXPENSES (INCLUDING REASONABLE LEGAL FEES) ARISING OUT OF OR IN CONNECTION WITH THE USE AND/OR DISCLOSURE OR DISSEMINATION OF YOUR INFORMATION IN ACCORDANCE WITH THIS PRIVACY STATEMENT.

12. Retention of Information

We will retain your information for as long as we are directed by the School or for as long as we are required under relevant laws.

If you would like us to delete your information, please contact the School directly with your request.

13. How to Contact Us

Please contact us if you have any questions about Our Privacy Statement or information we hold about you:

- by email at: dpm@aladdin.ie
- Or write to us at: DPM, Aladdin, Block 1, Deansgrange Business Park, Co. Dublin, Ireland.

This privacy statement was last updated on 24th August 2018