

# Privacy policy

Welcome to MyCoolClass!

We respect your right to privacy.

This Privacy Policy applies to your use of [www.mycoolclass.com](http://www.mycoolclass.com) (the “Website”). It tells you (the customer and our Teacher Members) what to expect when we collect personally identifiable information about you, and what your rights are concerning the collection of your information. It is provided in accordance with our obligations under the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

We have chosen to formulate our Privacy Policy in accordance with the UK Data Protection Act 2018 and the EU General Data Protection Regulation because these two Privacy Laws offer the highest standards in Data Protection requirements and may exceed the standards require in your region if you reside outside the UK and EU.

We will not collect any personally identifiable information about you unless it is in response to you using our Website or actively contacting us or registering for one of our online service products. The security of your personally identifiable information is extremely important to us.

This Privacy Policy is regularly reviewed to make sure that we continue to serve your privacy interests and we reserve the right to update it as we deem necessary.

Please review this Privacy Policy carefully. It should be read alongside the *MyCoolClass* Terms and our Cookies Policy. Unless otherwise defined, terms used have the same meaning as in the Terms.

If you have any questions, comments, or complaints about this Privacy Policy please contact us at the details set out below.

## 1. About Us

In this Privacy Policy, references to “we” or “us” are to MyCoolClass Co-Operative Limited. We are registered in the United Kingdom as a society under the Co-operative and Community Benefit Societies Act 2014. Reg No. RS004790.

## 2. What information we collect

### 2.1. Registering with *MyCoolClass*

**Learners:** When you register on the MyCoolClass Website, create and update your Learner profile, and/or when you purchase Online Classes or Courses on the Website, we will collect the following information:

- Name, email address, age (required)
- Home address, date of birth, telephone number, country of nationality (required for certain courses)
- Other personal data if you choose to register for a MyCoolClass account via third party sites including Facebook and Google and have provided your personal information on those platforms.
- Credit/debit card information
- Data relating to your use of our Website and enrolment on Online Classes and Courses
- Information provided by you when you correspond with us (including via surveys)
- Information provided from third party sources, such as Facebook or Google or our Partners who may invite you to a certain class or course.

**Teachers:** If you are a Teacher using our website to become a member of our Teachers Co-operative, we will collect the following information:

- Name, email address
- Nationality, country of residence and languages spoken.
- Principle subjects that you teach.
- The age groups of students that you teach.
- The class sizes you teach.
- Additional information about your qualifications will be requested in the pre-qualification process and separately to completing the pre-qualification form on our website.

## 2.2. *Learning journey*

**Learners:** When you are participating on an Online Class or participate in one of our Course, we may collect and store the following additional information:

- comments you voluntarily post while participating in online discussions with the Class/Course educators and other Learners during the Class/Course.
- any email communications with *MyCoolClass* to seek user support or to send queries related to the Class/Course, you may be enrolled in.
- any content submitted by you during the Class/Course, such as written assignments, quizzes, and examinations, and the results of any assessments.
- any data and documentation you submit in order to verify your identity where required to obtain a certificate or academic accreditation. All identity verification is performed in-house by *MyCoolClass*.
- responses you voluntarily provide to *MyCoolClass*, Class/Course educators, or in questionnaires, surveys, or Teacher research that you might participate in related to the Class/Course

## 2.3. Requesting additional information on a *MyCoolClass* Class/Course

We collect information from visitors to our Website who express interest in a particular Online Class or Course and wish to be

contacted by the teacher offering the Class or Course through our website. The information (learners' age dependent) might include:

- Name, email address, of the student and/or parent or guardian dependent on the age of the student.
- Educational background, employment background, address, country of residence and telephone number

#### 2.4. *Accessing the Website*

When you access the Website, we may use cookies to track, collect, and aggregate information about your use of the Website, including pages you have visited, the specific URLs that brought you to our Website, and links embedded on our Website that you have accessed. This information may include IP addresses, and any information collected by cookies. This may also include information such as the time and length of visits to certain pages on our website and page interaction information. For more information on our use of cookies, please refer to our **Cookies Policy**.

### **3. How we use your information**

3.1. In providing our online services and products to you, we will collect, store, and use your personal information for the following purposes:

3.1.1. to manage your Learner account or Teacher's account.

3.1.2. to provide you with technical support.

3.1.3. to send you email notifications and updates about Classes and Courses you or your child are enrolled on.

3.1.4. if you are taking a Course for academic credit, professional certification and/or other formal recognition of learning, to allow the university or other institution to monitor and track your progress, to award you with the relevant recognition as applicable, and to make

direct contact with you regarding your progress and completion of the Course.

3.1.5. to contact you occasionally in order to invite you to share your opinions of and experiences with *MyCoolClass*, and to publish customer reviews and ratings of our Courses on our Website or on other media channels.

3.1.6. for marketing purposes, where you provide us with your consent to receive marketing communications, which may include email and/or telephone communications with information, news, and offers of Classes and Courses on our Website.

3.1.7. for creating prospective customer databases by matching demographic data from your depersonalised information with members of the general public.

3.1.8. to use your information in an aggregated format to identify trends on our website and trends in our customer database. We may use this information in an aggregated and anonymous format to develop and improve our content.

3.1.9. to share general user data with our Online Course providers (Our Member Teachers) for research related to online education (as more fully set out below);

3.2. We use cookies to collect information relating to your use of the Website to enable, maintain and improve the functioning of our Website and the quality of our products and services. For more information, please see our [\*\*Cookies Policy\*\*](#).

## **4. Whom we may share your information with**

4.1. For the above purposes, we may share your information with the following third parties. Please note that any third parties' use of your personal data will be governed by their own privacy policies and give rise to separate obligations under applicable data

protection laws. We suggest that you carefully review any third-party privacy policies that may apply to you.

4.2. Third parties that may receive your information include:

4.2.1. our payment services providers (i) [PayPal \(UK\) Limited](#), (ii) [Wise](#); and (iii) [WeChatPay Inc](#); (iv) [Payoneer](#)

4.2.2 our online school management platform provider (i) [Ayotree](#)

4.2.3. providers of assessments and marking services when you register for an assessment or submit a piece of work for marking in connection with an Online Course;

4.2.5. customer relationship management service provider ([Ayotree](#)) (which allows us, for example, to send personalised email communications to you); all customer relations are managed in-house.

4.2.6. our file storage and management service provider.

4.2.7. our third party review and ratings partner, ([Google](#)) who assists us with collecting and moderating any review and rating you may elect to provide of our Online Content and Courses;

4.2.8. Any entity to which we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other legal requirements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **5. How our Teachers may use your information**

5.1 After you have registered with *MyCool/Class* we may use your data to determine the level of interest in you may have in enrolling in further courses offered by our teachers.

5.3. Our teachers may also embed links within the Online Course material or within emails related to the Course, and such links if selected will take you off the *MyCool/Class* Website and bring you to a third party website, for which the teacher is solely responsible. If you are asked to submit personal information on any third-party websites, the collection of that information will not be covered by this Privacy Policy and you must familiarise yourself with the terms and conditions and privacy policy of the third party website before submitting your information. At no time will you be required to submit any information on third party websites as a condition for continuing the Online Classes or Course on the *MyCool/Class* Website, and your decision not to provide information on third party websites will never affect your progress or any marks on the class or course.

## **6. Legal Basis for Processing Your Information**

We have several legal bases for collecting and using the personal information described above. They are:

6.1. Where the use of your personal information is necessary to perform our obligations under any contract with you (including providing you with access to Online Classes and Courses on the Website for which you have registered and/or made a purchase).

6.2. Where we have your explicit consent to collect, store, and use your information for a particular purpose, including where you consent to receiving marketing and promotional communications for products on our Website.

6.3. Where use of your personal information is necessary for purposes of pursuing *MyCool/Class's* legitimate interests or the legitimate interests of a third party such as our Class/Course

providers, as long as these interests are not outweighed by your own interests, fundamental rights, or freedoms. For example, we will need to ensure that in these cases you would reasonably expect your personal information to be used, and that it would have a minimal impact on your personal privacy. Such legitimate interests are:

6.3.1. to conduct our day-to-day business, including the operation of a fully functioning website offering online educational products.

6.3.2. to build relationships with schools, colleges, universities, and other institutions in the online education sector.

6.3.3. to ensure we are delivering a high level of customer service through ongoing customer communications and responses to customer queries.

6.3.4. to invest, test and roll out new Class or Course products which we believe will benefit our customers or prospective customers.

6.3.5. track and ensure completion of contractual obligations.

6.3.6. carry out market research and business development.

6.3.7. to operate our website.

6.3.8. to consider your teachers membership application, if you apply to become a member of our teacher's co-operative.

## **7. Storage and Security of Information**

7.1. All information is stored on our secure servers. When you register, we will ask you to choose a password which enables you to access the Online Classes, Courses and Content. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.



7.2. In addition, we (or third parties acting on our behalf) may also store or process information that we collect about you in countries outside the United Kingdom or European Economic Area, which may have different standards of data protection than in the UK and EU. Specifically, servers used by our Website are located in Bulgaria (an EU Country) and we work with Course providers (teachers) from around the world. We have put in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information. However, whilst we have used our best efforts to ensure the security of your data, it is your responsibility to make an informed decision to avail yourself of our services and products or if your concerns about the handling of data require you to refrain from using our Website.

## **8. Data Retention**

8.1. We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

8.2. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **9. Your Rights**

9.1. You as a Learner or Teacher have the following data protection rights:

9.1.1. You can edit your personal details via your profile page whenever you wish. We maintain a procedure in order to help you confirm that your personal information remains correct and up-to-date and give you the opportunity to choose whether or not you wish to receive material from us or our partners.

9.1.2. In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “[Contact MyCoolClass](#)” heading in the footer of our website.

9.1.3. You may unsubscribe from certain email communications by following the Unsubscribe link in the email communication itself. You may also update your personal information by logging into the Website and visiting your Learner or Teachers account page and change your communications preferences. You may also email us at [support@mycoolclass.com](mailto:support@mycoolclass.com) in order to access, correct, or update your personal information on our systems. We will answer every email as promptly as possible.

9.1.4. Similarly, if we have collected and process your personal information on the basis of your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your consent withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

9.1.5. If you have any privacy-related questions or unresolved problems, you may contact us using the information provided below.

9.1.6. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

Contact details for data protection authorities in the United Kingdom, the European Economic Area, Switzerland and certain non-European countries including the US and Canada are available [here](#).

## 10. Children

We take seriously our legal obligation to protect the privacy of children. The only information we might collect about a child under 13 is the first name of the child and their age; this is so that age-appropriate classes and learning materials can be provided to the child.

Parents or guardians can enrol a child under the age of 13-years for online learning through our website; to do this the parent or guardian must register for an account and add their child(ren) to their account to access online classes and courses.

Children under 13-years cannot create their own accounts on our website. Any child under 13-years who attempts to create an account independent of their parent or guardians will have their account and personal data deleted from our Learners database.

We expect the parent or guardian to supervise their child's use of our website. The child will not be given a Profile Page and all data relating to the child's use of our website will be assigned to the parent or Guardian's Profile Page.

## **11. Cookies**

Our Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website or Online Courses may no longer be available to you.

For more information about cookies, including further details as to what they are and how to refuse them, please see our [Cookies Policy](#).

## **12. Contact details**

MyCoolClass Co-Operative Limited  
FAO: Data Protection Officer  
E-mail: [support@mycoolclass.com]

## **13. Updating this Privacy Policy**

We may update or amend this Privacy Policy from time to time, to comply with law, in accordance with best practice in our industry, or to meet our changing business requirements. Any updates or amendments will be posted on the Website. By continuing to access the Website, use the Online Courses and Content, and/or provide content in connection with the Online Courses and Content, you will be deemed to have accepted the Privacy Policy as amended at the time of your access and use.

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