CLASS MANAGER GDPR POLICY

Last updated 21th September 2018

How does this website work?

classmanager.com is owned by Raviga Group Limited and we provide a software platform for owners of class/teaching businesses to help them manage thier administration. Any personal information collected on this website by the companies using our software shall be controlled by them under their own privacy policy. If you are a customer of a business that uses Class Manager, please contact business directly for their own privacy policy. Class Manager acts a data processor for the businesses using the Class Manager software.

This Privacy Policy covers information that our users (the business owners) gives to us about themselves and we have written it to tell you:

- What personal information we collect about you when you create an account with us
- How we use your personal information
- Who we may share your personal information with
- Any transfer of personal information outside of the EEA
- How long we keep your personal information
- What we do to protect your personal information
- What choices you have in relation to your personal information

We are Raviga Group Limited and our registered address is Sigma House, Oak View Close, Edginswell Park, Torquay, Devon, United Kingdom, TQ2 7FF.

We would welcome any comments or queries you may have about this website or how we deal with your personal information. You can contact us at hello@classmanager.com.

Personal Information we collect about you

What information we collect about you

We may collect the following information about you:

- Your name and address and name of your organisation
- Your contact details including email address and telephone number
- The contact details of your organisation
- The classes that you have organised
- Details of classes that you have organised in the past

- Your payment details (including bank account, credit card details, billing and delivery addresses)
- Details of visits to our website and the pages that you viewed.

We collect information about you in two different ways:

- Identifiable information this is information that allows us to identify you such as name and email address, telephone number etc
- Anonymous information we may use cookies to collect information that does not
 personally identify you but gives us information about your likes and dislikes so that we can
 ensure that our products and services are tailored to what our customers want. For more
 information on cookies, please see our Cookie Policy.

Remember: If you are a customer of a business that uses our software you should request to see their privacy policy in regards to your personal data. In this scenario Class Manager is only the data processor.

Personal Information you give us

We may collect personal information about you when you:

- Create an account
- Fill in an enquiry form
- Contact us by email or post
- Contact us by telephone
- Contact us using our live chat feature
- Make a payment using our platform

Personal Information we collect automatically

When you visit our website or use our services, we may collect certain information automatically such as:

- Your IP address (the name your computer used to identify itself to you)
- The number of times you visited our website
- The pages that you visit

If you want to know more about how we use cookies, you can find more information in our <u>Cookie</u> Policy

Personal Information we collect from other sources

We work with a number of other organisations such as payment processing companies, credit reference agencies, internet search engines, marketing organisations and cookie providers who may provide us with information about you.

We may collect personal information from the following organisations:

- Google Analytics
- Social Media Cookies and Plug ins Facebook, Twitter
- Payment Provider Cookies for anti-fraud purposes
- Support Service Cookies for when you require assistance

How we use your personal information

We may use your information in the following ways:

- To provide you with the products you have asked for
- To send you marketing materials (if you have agreed to this)
- To contact you about a request you may have made
- To process your payment
- To fulfil any contracts you have entered into with us
- To analyse and tailor the products that we offer to you with your needs and interests
- To comply with any legal obligation (such as tax laws) or as otherwise required by law or regulation
- To prevent and detect fraud
- To tell you about changes to our services or website
- To help us develop the website and make it better for all users
- To get your feedback on our website and services
- To administer our website (such as troubleshooting, data analysis, research)
- To keep our website safe and secure

Our legal basis for using your information

The law only allows us to use your personal information in certain limited circumstances. We have listed these below and what information they allow us to process.

Where we need to perform the contract we have entered into with you

Examples of how we may use your information in order to comply with a contract that we have entered into with you:

• To provide your with the platform to advertise your events

- To tell you about changes to our website or our services
- To help us improve the website

Where you have consented to us using your personal information

- When you set up an account with us you we will need your consent in order to process that information to provide you with access to our platform
- When you submit information to us on our website to ask us a question or request further
 information about our services, we will process that information in order to comply with your
 request for further information.

Where it is necessary for our legitimate interests

We may provide you with marketing information (via email) about our own products and services similar to those that you have purchased or enquired about (unless you tell us to stop).

Where we need to comply with a legal obligation

An examples of how we may use your information to fulfil a legal obligation, ie Keeping records for tax purposes

Our Marketing

We may provide you with information about our products, services, special offers, and other news where we feel these may interest you but only where you have not told us to stop.

We may use your information for market research and analysis so that we can ensure that we tailor our offers to your likes and needs.

Depending on what contact information you have given to us, we may contact you by email or post. We will only do this where you have consented to receiving such information from us.

You can opt out of such marketing at any time and If you wish to do so, please email us at hello@classmanager.com.

Sharing your Personal Information

Other third parties

We may share your information with certain other third parties including:

Your school (or other business) who use Class Manager to store your information

- Our business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- Our website providers who need to see your information in order to keep our website up and running
- Analytics and search engine providers who analyse information about your use of our website and help us to tailor the product and offers that we offer to you and other users

We work with the following organisations:

- Stripe (stripe.com) Payment Providers
- Amazon (aws.amazon.com) Hosting Provider

Legal Requirements and Law Enforcement

We may also disclose your personal information to third parties:

- If we sell our business in which case the personal information that we hold will be part of the transferred assets
- If we are required by law, or in order to enforce or apply our terms of use. This includes
 exchanging information with other organisations for the purposes of fraud protection and
 credit risk reduction

Third Party Privacy Policies

Our site may contain links to websites owned by other organisations. If you follow a link to another website, these websites they will have their own privacy policy. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

Where we store your Personal Information

Storage of Personal Information

We are committed to ensuring that our suppliers have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse. All personal information you provide to us is stored on our secure servers or on secure servers operated by a third party located in the EEA.

All third parties who provide services or software to us are required to sign a contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

Retention of Information

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We have a retention policy which lays down timescales for the retention of information. Customer retention periods can be found below:

Marketing Database

Name and contact details of people expressing interest in our goods or services. Retention Period: 3 years from last order or interaction.

Customer Database

Name and contact details of all customers including emails, addresses and payment information. Retention Period: 7 years after last use of software, or last subscription payment.

Our Customers Database

Any details entered by our customers on their customers. Retention Period: See thier privacy policy.

Emails

If you chose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

Your Rights

Remember: If you are a customer of a business that uses our software you should contact them in relation to your personal data they hold. In this scenario Class Manager is only the data processor.

Access to Information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact at hello@classmanager.com or write to us at the address above.

Changing or deleting your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can request that we change, amend, delete your information or restrict our processing by emailing us at hello@classmanager.com.

Right to prevent Automated decision making

You have a right to ask us to stop any automated decision making. We do not intentionally carry out such activities, but if you do have any questions or concerns we would be happy to discuss them

with you and you can contact us at hello@classmanager.com.

Transferring Personal Information

You have the right to request that your personal information is transferred by us to another organisation (this is called "data portability"). Please contact us at [Data queries Email] with the details of what you would like us to do and we will try our best to comply with your request. If may

not be technically feasible, but we will work with you to try and find a solution.

Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure. Our internal complaints procedure allows your request to be reviewed by a director who will do their best to try

and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner's Office. They can be contacted as follows:

• Website: ico.org.uk

• Telephone: 03031231113

Address: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow,

Cheshire, SK9 5AF

Changes to our Privacy Policy

We review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with your information and may amend it if necessary. You should check this page regularly to see the most up to date information. How to Contact us We welcome questions, comments and requests regarding this Privacy Policy which can be sent to hello@classmanager.com.