

# Privacy Notice for Schools

## Notice to Schools – updated June 2026

This Privacy Notice for Schools is designed to help schools, teachers, parents and guardians understand how 3P Learning processes the personal information that schools provide to us when teachers and students use our licensed learning programs.

As a school customer that provides limited personal information about teachers and students for them to access our licensed programs, the information in this Notice is relevant to teachers, parents and guardians. We ask that you make this Notice available to them. Any questions can be referred to us at [privacy@3plearning.com](mailto:privacy@3plearning.com).

In this Notice, “3P Learning” means 3P Learning Limited as the licensor and creator of our learning programs and resources, together with our regional subsidiaries that provide service and support to your school. The 3P Learning products covered by this Notice are Mathletics, Reading Eggs, Reading Eggspress, Mathseeds, Writing Legends, Brightpath and LiteracyPlanet

By using our products, the school agrees and gives consent on behalf of its users to the processing of personal information as set out in our Privacy Policy and this Notice.

### Our role and your role

For school-managed (B2B) accounts, the school (or multi-academy trust, local authority, or other education organisation) is the Data Controller. 3P Learning is the Data Processor and processes personal information only on the school’s documented instructions, as set out in the subscription/licence agreement, any rostering arrangement, and our Data Processing Agreement.

Parents, guardians and pupils with questions about why the school uses 3P Learning, or who wish to exercise individual rights (access, correction, erasure, restriction, portability, objection), should contact the school in the first instance. 3P Learning will assist the school in responding.

### Personal information – purpose of collection

The personal information provided by a school to 3P Learning is for an educational purpose and to enable the features of the user’s licensed access to our programs.

3P Learning processes personal information provided by the school’s representatives in order to:

1. perform our obligations under our agreement(s) with the school;
2. create and administer teacher, administrator and student accounts;
3. deliver lessons, assessments and reporting features within our learning programs;
4. communicate with the school in relation to our licences, products and services; and
5. comply with applicable laws, rules and regulations.

3P Learning and its subsidiaries process personal information provided by a school as set out in this Notice, our Privacy Policy, and our Data Processing Agreement, and in line with the laws, rules and regulations that apply to us.

## Personal information in school accounts

The school directly controls the personal information provided to our learning programs and the use and maintenance of that information within those programs. Teachers and administrators may also access additional resources (such as newsletters and seminars) and can manage their personal information in relation to those resources. 3P Learning communicates only with teachers and administrators – not directly with students.

## Teacher and administrator information

The school may enter the teacher or administrator's name (first, last and/or pseudonym), work email address, school name, role and support correspondence. 3P Learning uses this information to create and manage accounts, set up classes, allocate licences, resolve enquiries, and contact teachers and administrators as set out in our Privacy Policy.

## Student information

The school may enter student information consisting of the student's first name or initials, year/grade level, class assignment and assigned teacher to enable student and teacher features in our programs. We also process learning activity data (scores, progress, time on task, content interactions, and free-text entered into learning activities).

**Read aloud feature (Reading Eggs):** in a school subscription, a teacher may create and assign a 'Read Aloud' activity. This requests an audio recording from the child so the teacher can assess reading fluency. Audio files can be deleted at any time by the teacher and are automatically deleted in alignment with our data retention periods (referenced in our full privacy policy). We do not extract or store voiceprints or any other biometric identifier from these recordings.

At any time, the school may update or remove student personal information by using our program, or by contacting us at [privacy@3plearning.com](mailto:privacy@3plearning.com).

## Parent and guardian information

We do not collect parent or guardian information from a school. However, parents and guardians may contact us directly and provide their name, contact details and the nature of their enquiry. We will respond to enquiries from parents and guardians in relation to our education programs subject to the laws that apply to us and to the school. This may include referring the enquiry to the school and obtaining permission from the school (as the subscription holder) before providing a response.

## How student information is displayed

Only a first name, initials, or a school-chosen identifier is ever displayed in class or school leaderboards. A full pupil name is never shown outside the pupil's class, and is never displayed on the public internet without explicit consent.

## What we do not do with student data

- We do not use pupil data for behavioural advertising or to build marketing profiles.
- We do not use children's identifiable personal information to train AI models.
- We do not sell, license or share children's personal information with data brokers.

- We do not collect biometric identifiers (such as voiceprints, facial templates, fingerprints), government-issued identifiers (such as social security numbers, passport numbers), or precise or coarse geolocation data about children.
- Our products do not include any feature that allows parents, schools or other users to track a child's location.
- We do not share children's personal information with third parties for the third parties' own purposes.

## **Persistent identifiers (cookies, IP addresses, log data)**

We use limited technical data – “persistent identifiers” such as IP addresses, device identifiers, cookies, log data and mobile-app identifiers – only to support the internal operations of our services. This includes:

- authenticating users and maintaining session state;
- security, abuse and fraud prevention;
- troubleshooting, diagnostics and service reliability;
- internal analytics and A/B testing to improve the service; and
- legal compliance and record-keeping.

Persistent identifiers are subject to role-based access controls and technical safeguards to prevent their export to advertising or profiling platforms. Security logs containing persistent identifiers are automatically deleted in alignment with our data retention periods (referenced in our full privacy policy).

## **Storage, sharing and subprocessors**

We do not sell personal information. We share personal information only with trusted third-party subprocessors who help deliver our services. Subprocessors process personal information only on our instructions and under contractual privacy and security obligations. They are not authorised to use personal information for their own purposes.

Our current list of subprocessors and storage locations is referenced in our full privacy policy.

## **International data transfers**

3P Learning develops and owns our online educational programs. Schools located anywhere in the world access our programs online. Online data is hosted by Microsoft Azure or Amazon Web Services in the United States or Australia. Data is encrypted in transit and at rest using industry recognised encryption standards.

Your school is supported by the regional 3P Learning office set out in your subscription agreement. Information you provide in support enquiries may be referred to global team members located in Australia, Canada, New Zealand, the United Kingdom and the United States.

Where we transfer personal information across borders, we use appropriate safeguards, including the UK International Data Transfer Agreement (IDTA), the EU Standard Contractual Clauses (SCCs) and the UK Addendum to the EU SCCs where required, supported by additional technical measures including encryption.

## **Security and data protection measures**

We apply layered administrative, technical and physical safeguards to protect personal information throughout its lifecycle, including:

- encryption of data in transit (TLS 1.2+) and at rest (AES-256 or equivalent);
- role-based access controls (RBAC) and segregation of customer data;
- multi-factor authentication (MFA) for employee administrative access to production systems;
- Monitoring and intrusion detection;
- regular vulnerability scanning, patching, and at least annual independent penetration testing for products that process children’s data;
- a documented incident response plan, tabletop-tested annually, including parental and regulator notification obligations;
- mandatory annual cybersecurity and children’s privacy training for all employees; and
- privacy by design and by default, including Data Protection Impact Assessments (DPIAs) for higher-risk processing.

Our SOC 2 Type II, WISP and ROPA reports are available on request via [privacy@3plearning.com](mailto:privacy@3plearning.com).

## Data privacy breach response

3P Learning maintains response plans to investigate suspected or actual breaches of, and threats to, the security of personal information. We will notify customers without undue delay and support them with any regulator obligations upon becoming aware of any notifiable data privacy or security breaches. As the school is the data controller, it remains the responsibility of the school to notify any relevant authorities in the event of a breach.

## Data retention and removal

3P Learning retains personal information only for as long as is reasonably necessary for the purpose it was collected for – typically to provide access to the licensed products, administer the subscription and account features, deliver reports, and support renewals and account retrieval – then irreversibly anonymises it.

Default retention periods are set out in our full privacy policy. Because the school is the Data Controller, the school can instruct us otherwise at any time.

Schools may request that 3P Learning permanently remove the personal information of students, teachers and/or administrators at any time by contacting [privacy@3plearning.com](mailto:privacy@3plearning.com). On receipt of a verified request, we will delete or anonymise the data from production systems within 30 days.

Removing personal information will affect the school’s access to reports (including historic reports in some cases). 3P Learning cannot restore data that has been removed. A school request to remove personal information may supersede our default retention periods.

## Ownership of information

Schools retain ownership and remain Data Controllers of student and teacher personal information. 3P Learning does not claim ownership and processes this data only to deliver the service. Schools and families also retain ownership of student-generated content and results. 3P Learning owns the underlying platform, software, and aggregated or anonymised insights that do not identify individuals.

## Information for Australian and New Zealand schools

3P Learning complies with the Australian Privacy Act 1988 and the Australian Privacy Principles, and the New Zealand Privacy Act 2020. Our products covered by this Notice are designated internet services likely to be accessed by children and are within scope of the OAIC Children’s Online Privacy Code, with which we will comply from its commencement. Our products are also assessed under the Safer Technologies for Schools (ST4S) framework. The best interests of the child are a primary consideration in how we design our products and handle personal information.

## Information for UK and EU schools

3P Learning processes personal data provided by UK and EU schools in accordance with the standard contractual clauses set out in our Data Processing Agreement. Where the school is the Data Controller, 3P Learning provides the services as the Data Processor.

3P Learning UK Limited is registered with the UK Information Commissioner’s Office (registration Z2188515, [link to certificate](#)). Refer to the section “Personal information – purpose of collection” for the lawful basis on which schools typically rely (most often the performance of a task in the public interest, the exercise of official authority, or legitimate interest).

## Information for US schools

Where 3P Learning provides services to schools, school districts or education agencies in the United States, we act as a “school official” under the US Family Educational Rights and Privacy Act (FERPA, 20 USC §1232g) and use student education records only to provide the service under the school’s direction. We also support schools’ compliance with applicable state student-privacy laws, including the California Student Online Personal Information Protection Act (SOPIPA) and equivalent state laws. Our products covered by this Notice carry the kidSAFE+ COPPA seal and align with the FTC COPPA Rule (16 CFR Part 312), including the Final Rule published 22 April 2025.

## Information for Canadian schools

3P Learning processes personal information provided by Canadian schools in accordance with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation, including Quebec’s Act respecting the protection of personal information in the private sector (as amended by Law 25), Alberta’s Personal Information Protection Act (PIPA), British Columbia’s Personal Information Protection Act (PIPA), and the student-record provisions of provincial education statutes (such as Ontario’s Education Act and Municipal Freedom of Information and Protection of Privacy Act). Where the school, school board or district is the institution responsible for student records, 3P Learning acts as a service provider and processes personal information only on the school’s documented instructions under our Data Processing Agreement. Consistent with PIPEDA’s ten Fair Information Principles, we limit collection to what is necessary for the educational purpose, obtain consent through the school, safeguard personal information, and support individuals’ rights of access and correction through the school. Cross-border transfers of personal information (including to the United States or Australia for hosting and support) are subject to comparable contractual protections, and we will respond to enquiries from the Office of the Privacy Commissioner of Canada and applicable provincial regulators (including the Commission d’accès à l’information du

Québec, the Office of the Information and Privacy Commissioner of Alberta, and the Office of the Information and Privacy Commissioner for British Columbia).

## Right to complain to a regulator

Individuals have the right to lodge a complaint with a supervisory authority if they think we have not handled personal information properly. We encourage individuals to contact us first at [privacy@3plearning.com](mailto:privacy@3plearning.com) so we can try to resolve the issue directly. The relevant regulator includes:

- **UK** – Information Commissioner’s Office ([ico.org.uk](http://ico.org.uk)), helpline 0303 123 1113.
- **Ireland** – Data Protection Commission ([dataprotection.ie](http://dataprotection.ie)).
- **Australia** – Office of the Australian Information Commissioner ([oaic.gov.au](http://oaic.gov.au)).
- **New Zealand** – Office of the Privacy Commissioner ([privacy.org.nz](http://privacy.org.nz)).
- **Canada** – Office of the Privacy Commissioner of Canada ([priv.gc.ca](http://priv.gc.ca)) and applicable provincial regulators.
- **United States** – Federal Trade Commission ([ftc.gov](http://ftc.gov)) and the relevant State Attorney General for children’s data under COPPA.
- **South Africa** – Information Regulator ([info regulator.org.za](http://info regulator.org.za)).

## Contact us

For privacy questions or requests – including school requests for access, correction, deletion or anonymisation of personal information – please contact our Data Protection Office at [privacy@3plearning.com](mailto:privacy@3plearning.com). We aim to respond within 7 days. Complex requests may take longer, in which case we will keep you informed of progress.

Other regional contact information is available at [3plearning.com/contact](http://3plearning.com/contact).

We look forward to our work together in our learning communities.

Please refer to our [Full Privacy Policy](#) for further information.

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