



Privacy Policy
Ten Town Limited

Ten Town take your privacy seriously, and this privacy policy explains how we use any personal information we collect about you when you subscribe to Ten Town. The topics covered are:

- 1) What data we collect from you
- 2) How we use your data
- 3) How long we retain your data for
- 5) How we keep your data safe
- 4) Who we share your data with
- 6) How to find out what data we hold about you

If you have any queries then please do not hesitate to contact our Data Protection Officer (DPO) at info@tentown.co.uk.

1) What data we collect from you

Your data is collected a) when you subscribe and pay and b) during your subscription period.

a) The data we collect when you subscribe to Ten Town:

- Name
- School name (where applicable)
- Address
- Telephone number
- Email
- Username
- Accounts contact (where applicable)
- Accounts contact email (where applicable)
- Where you heard about us

The payment process:

Schools pay either by BACS, cheque or by card.

Parents pay only by card.

Card payments:

Ten Town are compliant with the Payment Card Industry Data Security Standard (PCI DSS) Level 4. Ten Town's card payments are handled by WorldPay, and Ten Town do not hold or process any cardholder data on our own system.

BACS and cheque payments:

BACS and cheque payments are processed through the standard banking process. Ten Town do not hold or retain your financial details on our database.



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b) The data we collect during your subscription period:

- Pupil/child name

When you begin your subscription to Ten Town you will be asked to set up a "class sign in" (schools) or a "child sign-in" (parents).

Schools have the option to enter the first names of pupils in each class. We ask that only first names are used. If two or more children have the same first names then you can add a single letter or number to differentiate the children.

Parents can add their child's name along with a picture icon. If a parent does not wish to enter the name of their child, they can leave this blank and just select a picture icon.

- IP address

The IP address of the internet server you are connected to is stored every time that you log into Ten Town.

- Session data

Each time you sign into Ten Town we store data about your session. This allows you to see which activities each child has attempted and also enables them to achieve certain goals like making the number 10 appear on the interactive map of Ten Town.

The collection of the IP address and session information also enables us to ensure the site is being used in line with our terms and conditions.

- Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

You can set your browser not to accept cookies, and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

You can find out more details on the cookies we use here:
www.tentown.co.uk/about/our_cookie_policy.php

2) How we use your data

The legal basis on which we process your data are:

- That it is necessary to fulfil our contract with you
- That it is in our legitimate business interests

Your data is only used for operational purposes, to administer your subscription effectively and provide you with any additional products and services that you have requested.

During the period of your subscription, we may email (and occasionally post) information to you on the following areas:



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- Technical changes to the site
- Best practice
- New Ten Town content, services and products
- A reminder when your subscription is due to expire, with information about how to renew
- Any information that we deem relevant to the successful and effective use of Ten Town in your setting

If you decide not to renew your subscription, we will delete your data (see below) and we will not contact you again after this point.

3) How long we retain your data for

After your subscription has expired, your data will be held for 12 weeks and will then be deleted from our database. If you would like your data to be deleted before 12 weeks then please let us know and we will be happy to remove your details immediately.

However, there are legal requirements for us to keep some basic personal data for longer. HMRC require all limited companies to retain records for six years. This includes details of who we sell our services and products to.

The following information is retained for accounting purposes only (schools):

- Main accounts contact
- School address
- Subscription package and resources purchased

The following information is retained for accounting purposes only (parents):

- Name
- Address
- Subscription package and resources purchased

Ten Town's accountancy records for all transactions before March 2018 are stored on internal encrypted files. As part of the government's mandate to "Make Tax Digital" by April 2019, Ten Town now uses Intuit QuickBooks online accounting and all subsequent records will be stored on this system. Intuit is a licensee of the TRUSTe Privacy Program and participates in the EU–U.S. Privacy Shield Framework and complies with the Privacy Shield Principles.

When a company keeps personal data to comply with legal requirements and professional guidelines, the ICO do not consider this information has been kept for longer than necessary (Principle 5: Retaining Personal Data).



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4) How we keep your data safe

Ten Town have achieved the Cyber Essentials PLUS certification. This is the higher level of the government-backed accreditation scheme that includes an external vulnerability scan, as well as an on-site, internal scan, penetration test and assessment of IT infrastructure carried out by an external certifying body.

The Ten Town website features a Secure Sockets Layer (SSL), which means that your connection to our server is encrypted. You can see details of our SSL certificate by going to the Ten Town home page and then clicking on the padlock next to www.tentown.co.uk in the address bar.

Ten Town's office workstations include a Trusted Platform Module (TPM) and the drives are encrypted using Microsoft's BitLocker. Any files containing data are also protected using the Encrypting File System (EFS). Ten Town's email server is protected by SpamTitan advanced email security.

Ten Town's web hosting services are provided by Catalyst2. The Catalyst2 hosting infrastructure is located within their own racks at the Telehouse datacentre in London, one of the UK's premier hosting facilities. This is protected by its own compound, 24-hour manned security, CCTV and access only by named personnel.

Ten Town's data is stored on virtual dedicated servers, the most secure cloud computing platform, and Catalyst2 provide a fully managed service that is protected by multiple clusters of high performance Fortinet firewalls, and includes 24x7 monitoring as well as automated patching and security scanning. Catalyst 2 are ISO 27001 and ISO 9001 certified and are GDPR compliant.

Ten Town are compliant with the Payment Card Industry Data Security Standard (PCI DSS) Level 4.

5) Who we share your data with

Ten Town do not share your information with any other party.

6) How to find out what data we hold about you

Please contact us if you would like access to the data we hold about you. We are required by law to provide this information within 31 days from receipt of the request, but we aim to respond within seven days. Please email our Data Protection Officer (DPO) at info@tentown.co.uk.



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