Privacy Policy

Introduction

Maypole Education Ltd (Maypole) provides a service which consists of a collection of online games and access to a teachers dashboard, known as NumberClub. This privacy policy sets out how Maypole Education Ltd uses and protects any information that you give Maypole when you use NumberClub.

Maypole is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using NumberClub, then you can be assured that it will only be used in accordance with this privacy policy. We strictly limit the information we collect to what is necessary to deliver NumberClub to teachers and students. We use your data only for the specific purposes we describe below. We will not use any data which you provide or we collect for third-party marketing or other unrelated purposes. We will not sell any such data to anybody nor share it with any company not directly involved in providing NumberClub to you and your students. Our partners are also limited to using the data only for our specific purposes.

We provide NumberClub all around the World and in doing so comply with the UK GDPR, US law, including the Children's Online Privacy Protection Act (COPPA), the Family Educational Rights and Privacy Rights Act (FERPA), the California Consumer Privacy Act (CCPA) and other state legislation, and applicable privacy and data protection law in the other countries.

Maypole is a proud signatory of the Student Data Privacy Pledge. The Student Data Privacy Pledge is an initiative by K-12 School Service Providers in the United States to support the effective use of student information and to safeguard student data.

Maypole may change this privacy policy from time to time by updating this page without providing notice. We will not, however, make any material changes that relate to the collection or use of student data without first giving notice to the school and providing a choice before the student data is used in a materially different manner than was disclosed when the information was collected.

This policy is effective from September 25th 2026.

What information we collect

Data Set A is the information we collect from and about schools in respect of the creation and administration of customer accounts other than student data. If you are a member of staff in a school, when you sign up for an account, we collect the following personal data:

- your name
- your contact details (including email address)

We also collect contact details of your school such as address and phone numbers, as well as the names of any people we need to contact to provide our services, for example IT support staff, or accounts department.

We automatically collect computer-related data through cookies (see confirmation in "How we use cookies" below that we are not using them to collect personal information about you).

Data Set B is the strictly limited personal data we collect from schools concerning their students and when the students are playing NumberClub. For each of the children/students who will be using NumberClub, we collect from the school only a student name or some other student identifier the school can use to identify students in the data. In addition, we record the state of any game, so the student can return to the game where they left off and also record precisely how each student progresses through playing NumberClub ("Playing Records"), together with computer-related data through cookies. While Playing Records are linked to a student's name or identifier, they are student data and are controlled by the school.

Why we need and what we do with the information we gather

We require Data Set A to understand your needs and provide you with a better service, and in particular for the following reasons:

- to register your school for our service and to deliver upon and manage our contract with your school,
- for our internal record keeping and billing,
- to enable us to answer your queries,
- to report on the progress of your students using NumberClub whether individually, in classes and/or on a whole school basis
- to verify your identity for security purposes,
- to send you updates or information on our services, if you have asked us to.

We will hold this data for as long as you remain a customer of Maypole and for 2 years afterwards to allow us to comply with requests for access.

With respect to Data Set B, the school remains Controller of all student data, including student names or identifiers and the Playing Records linked to them. We process this data only on the school's behalf, in order to:

- Deliver NumberClub to the school's students, including saving each student's progress so they can carry on where they left off
- Report to schools on how children are performing with NumberClub
- Check a child using NumberClub is the same child who was using NumberClub on the same device earlier
- Keep NumberClub secure and working

If the school has not previously done so, we will delete student names/identifiers and the Playing Records linked to them no later than 60 days after your school's subscription has ended, or sooner where the school's agreement with us requires it.

We also create a de-identified copy of Playing Records. Before a Playing record is added to this copy, we remove the student's name and identifier and replace them with a new reference that cannot be traced back to the student. We also remove school and class details, and we keep no key linking the two. Because no child can reasonably be identified from it, this de-identified data is not personal data and

belongs to Maypole. We use it to analyse how children learn from NumberClub and to improve our games, including training AI models, and we may share it with third-party researchers in de-identified form only. We will never attempt to re-identify any child from it.

Security

We are committed to ensuring that all information is secure under the laws of all the jurisdictions in which we operate. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

All data is encrypted in transit (using the standard web encryption behind https) and when stored. Our security safeguards are aligned with the NIST Cybersecurity Framework. Everyone who can access student data, including our staff and our development partner, uses multi-factor authentication and is trained on the laws that protect student data before they are given access.

We use Amazon Web Services (AWS) to securely store your data in their servers located in the United Kingdom. The physical security of AWS servers and other infrastructure is tightly controlled according to industry best practice. In addition to a strong security focus,

AWS has also been designed to be resilient to failure, featuring multiple separate power supply systems, independent network links and a range of other measures to ensure servers are always available. AWS processes personal data in accordance with its GDPR Data Processing Addendum, which is incorporated into the AWS Service Terms and includes the obligations required under Article 28 of the UK GDPR and EU GDPR, together with appropriate safeguards for international data transfers where applicable

You control access to your school's data (including student identities) via user accounts that only you (or Maypole on request) can create. It is your responsibility to safeguard the password information and only give it to people you trust

In the unlikely event of a data breach, we have a process in place to detect, report and investigate it. We will inform the Data Controller within 24 hours of establishing that their personal data was affected, and meet all other data breach requirements required by law.

Ownership

Schools retain ownership of all data entered or uploaded into Maypole, and have ultimate control over who has access to it. Schools should be aware that any individual's data stored may be accessible to other users at the school where they have allowed it. We keep each school's data completely isolated and do not disclose school-specific data across schools so only an individual authorised by each of more than one school could access the data of more than one school.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer

needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. We do not use cookies to collect any personal information, nor do we use them for behavioural advertising, to build a student profile unrelated to the use of NumberClub, or for any other reason. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. We will use our best endeavours to ensure that any sites we link to do not contain advertising or any information or content that may be harmful to children. You should exercise caution and look at the privacy policy applicable to the website in question.

Sharing your data with others

We share data only with the contractual business partners directly involved in delivering NumberClub: Amazon Web Services, which hosts and stores our data in the United Kingdom, and Aircury Ltd, which develops and maintains NumberClub's systems.

Each is bound in writing to protect your data to standards at least as strict as this privacy policy, and may use it only to help us deliver NumberClub. We will not share your data with any other organisation without your express written permission, unless we are required by law to do so, most likely in the investigation of suspected fraud, illegal activities or potential threats to the safety of any person. Where the law requires us to disclose student data, we will tell the school first unless the law forbids it.

Your data might be transferred to another entity if we are acquired by or merged with another entity, if substantially all of our assets are transferred to another entity, or as part of a bankruptcy proceeding. We will ensure to the extent permitted by law that any such entity is bound by privacy obligations that are at least as strict as those set out in this privacy policy. Student data will not be used in a materially different manner without first giving notice to schools and providing them a choice, even in the event of acquisition or merger with another entity.

U.K. GDPR individual rights and Subject Access Requests

Customers, users, teachers, employees, contractors and others about whom we hold personal data ("Data Subjects") may make Subject Access Requests ("SARs") at any time to find out more about the personal data which Maypole holds about them, what it is doing with that personal data, and why.

SARs may concern:

- The right to find out what Personal Data about the Data Subject we hold
- The right to have Maypole correct any incorrect or incomplete Personal Data about the Data Subject

- The right, in some circumstances, to ask Maypole to delete Personal Data about the Data Subject
- The right, in some circumstances, to ask Maypole to stop processing Personal Data about the Data Subject
- The right for some Data Subjects to data portability in respect of Personal Data about the Data Subject
- The right, in some circumstances, to object to Maypole processing Personal Data about the Data Subject

Save where required to do so by law, Maypole will not delete Personal Data that is required to maintain our business purpose or that is required to facilitate use of NumberClub.

Any Data Subjects wishing to make a SAR should do so using the Subject Access Request Form found at the end of this policy, sending the form to the Company's Data Protection Officer at

Maypole Education Ltd., 4 Barns Road, Budleigh Salterton EX9 6HJ or email hello@numberclub.com This will be processed free of charge within one month of the request (unless your request is manifestly unfounded or excessive or you request further copies of your data).

You can find detailed information about your rights under UK GDPR on the UK Information Commissioner's website at www.ico.org.uk. If you think there is a problem with the way we handle your data, you can complain there too. Maypole Education Ltd is registered with the U.K. Information Commissioner's Office with registration number ZB008323

Individual rights in other jurisdictions

This privacy policy complies in all material respects with the regulations contained in COPPA, FERPA, CCPA, legislation in US states other than California and legislation in the other countries where NumberClub is available.

If your school is in the United States, please send any enquiries to hello@numberclub.com

New York schools. If your school is in New York State, our New York Schools Addendum also applies and takes priority over this privacy policy where the two differ. It includes the Parents' Bill of Rights for Data Privacy and Security and supplemental information about how NumberClub protects student data. Parents can ask to see or correct their child's data by contacting their school.

If, for example, you are a California resident, you may have the right under the CCPA to request Maypole to:

- disclose if we have collected Personal Information about you;
- disclose the categories of Personal Information that we have collected about you (if any); the categories of sources from which the Personal Information is collected; the business or commercial purpose for collecting or selling Personal Information; and the categories of third parties with whom the business shares Personal Information;
- disclose the specific pieces of Personal Information that we have collected about you (if any);
- delete Personal Information we have collected about you (if you satisfy the conditions set out in the CCPA); and

- not sell the Personal Information we have collected about you (although as noted above, we do not sell your Personal Information).

You can submit a request under the CCPA by emailing us at hello@numberclub.com. In order to respond to a request, we will need to verify your identity. If you have an account with us that is password-protected, we may verify your identity through our existing authentication practices for your account. If you do not have an account with us, and your request concerns "categories" of Personal Information collected, we can request from you two data points of Personal Information to verify your identity. If you do not have an account with us, and your request concerns specific Personal Information, we can request from you at least three data points of Personal Information as well as a signed declaration with penalty of perjury to verify your identity. As a California resident, you also have the right to designate an agent to exercise these rights on your behalf. We may require proof that you have designated the authorized agent to act on your behalf and to verify your identity directly with us. Please contact us at hello@numberclub.com for more information if you wish to submit a request through an authorized agent.

We hereby inform you that we will not discriminate against you if you exercise any of your rights under the CCPA; for example, we may not deny you goods or services for that reason, or subject you to different prices than those paid by other consumers, unless provided otherwise under the CCPA, Federal, or State law.

As stated above, we may collect the following categories of Personal Information from California residents: (a) names and email addresses; (b) commercial information,

including records of products or services purchased, obtained, or considered from our Site; (c) recordings of use by students of NumberClub.

We collect this information to provide NumberClub and for the other purposes described above. We collect this either from you directly or from schools/school districts that are our customers and share this information only as set forth above. If we are acting as a service provider to schools in connection with the CCPA, we are not responsible for responding directly to requests under the CCPA and will forward such requests to the school for direction on a response.

Child-friendly Privacy Policy

Introduction

We want to help you understand how playing NumberClub results in the spread of information about you. The short answer is "Very little!"

By the way, whenever there's something you still don't understand, please ask your teacher or your parents! They should be able to explain. Or they can ask us if they're not sure either.

What information about you has your teacher given to us?

Probably just your first name, or your initials. It's not very much! We only want to know the absolute minimum about you that allows us to deliver NumberClub to you.

What information do you give us when you use NumberClub?

Only how you play! Every time you play, we record how you play. We do that only to help us to make the NumberClub better and to show your teacher how you are getting along.

To whom else do we give the information we have about you?

We report back to your teacher concerning how you play NumberClub. Otherwise the little we know goes just to the people and companies who help us to provide and improve NumberClub and they don't pass it to anybody else. When we share

information of how you played NumberClub with somebody, we make sure they won't know it was you.

How long do we keep the information about you?

We keep your first name/school number, and the records of how you play that go with it, only while your school uses NumberClub. After that we delete them. We also keep a copy of how you play with your name and everything else about you taken off, so nobody can tell it was you. We use that copy to help make NumberClub better.

What are cookies?

"Computer" cookies are little bits of code that web sites like NumberClub leave on your computer to remember who you are and how you use the game. Our cookies are only trying to help you to get the most from NumberClub , nothing else! Our cookies don't secretly spy on you and don't pass on information about you to anybody else.

What data protection rights do I have?

The law generally provides that you have the right to access the personal data we have about you, and to ask us to change and/or delete the personal data we have about you. However, remember that we only have your name supplied to us by your school which you know already. If you asked us to change and/or delete that, you might not afterwards be able to use NumberClub ! If you want to suggest any changes, please discuss them with your teacher who will be able to make any changes the two of you agree!

Could any of this policy change?

We hope not and we definitely won't make any big changes in our approach to your privacy without telling you first.

What if I need help understanding this?

Talk to your teacher or parents first and ask them to email us with your questions if they can't answer them.

SUBJECT ACCESS REQUEST FORM

You should complete this form if you want us to supply you with a copy of any personal data we hold about you. You are currently entitled to receive this information under UK GDPR. We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist.

We will endeavour to respond promptly and in any event within one month of the latest of the following:

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly.

SECTION 1: Details of the person requesting information

Full Name:	
Address:	
Contact telephone number:	
E-mail address:	

SECTION 2: Are you the data subject?

Please tick the appropriate empty box and read the instructions which follow it.

	YES: I am the data subject. I enclose proof of my identity (see below). (please go to section 4)

	NO: I am acting on behalf of the data subject. I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity (see below). (please go to section 3)

To ensure we are releasing data to the right person we require you to provide us with proof of your identity and of your address. Please supply us with a photocopy or scanned image (do not send the originals) of one or both of the following:

1) Proof of Identity - Passport, photo driving licence, national identity card, birth certificate.

2)Proof of Address - Utility bill, bank statement, credit card statement (no more than 3 months old); current driving licence; current TV licence; local authority tax bill, HMRC or U.S. federal tax document (no more than 1 year old).

If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

SECTION 3 Details of the data subject (if different from section 1)

Full name:	
Address:	
Contact telephone number:	
Email address:	

SECTION 4: What information are you seeking?

Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.

Please note that if the information you request reveals details directly or indirectly about another person we will have to seek the consent of that person before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

While in most cases we will be happy to provide you with copies of the information you request, we nevertheless reserve the right, in accordance with Article 12 of the UK GDPR to charge a fee or refuse the request if it is considered to be "manifestly unfounded or excessive". However, we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

SECTION 5: Information about the collection and processing of data

If you want information about any of the following, please tick the empty boxes:

Why we are processing your personal data	
To whom your personal data are disclosed	
The source of your personal data	

SECTION 6: Declaration

Please note that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to Maypole Education Ltd is true. I understand that it is necessary for Maypole Education Ltd to confirm my / the data subject's identity and it may be necessary to obtain more detailed information in order to locate the correct personal data.

Signed..... Date .....

Documents which must accompany this application:

- Evidence of your identity (see section 2)
- Evidence of the data subject's identity (if different from above)
- Authorisation from the data subject to act on their behalf (if applicable)

Please return the completed form to:

Data Protection Officer

Maypole Education Limited, 4 Barns Road, Budleigh Salterton, EX9 6HJ, United Kingdom

Email: hello@numberclub.com

Correcting Information

If after you have received the information you have requested, you believe that:

- the information is inaccurate or out of date; or
- we should no longer be holding that information; or
- we are using your information for a purpose of which you were unaware;
- we may have passed inaccurate information about you to someone else;

then you should notify our Data Protection Officer at once.