

Privacy Policy

1. Introduction

This Privacy Policy explains how **Sanako UK Ltd** (“the Company”, “we”, “us”) collects, uses, stores, and protects personal data when providing language-learning software and related services to educational institutions across the United Kingdom and Ireland.

We are committed to safeguarding personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- EU General Data Protection Regulation (EU GDPR)
- Data Protection Act 2018
- Guidance from the ICO and the Irish DPC

By using our services, customer institutions and users acknowledge that their data will be processed in line with this policy.

2. Who We Are

Sanako UK Ltd is a software and hardware reseller specialising in language-learning solutions for schools, colleges, and universities. We act as:

- **Data Controller** for our own business operations (e.g., billing, CRM, marketing).
- **Data Processor** when handling personal data on behalf of educational institutions for software provisioning and support.

Contact details are provided in Section 14.

3. Personal Data We Collect

We collect and process different types of personal data depending on the relationship with the Company.

3.1. Data from Educational End Users (Students & Staff)

- Name
- Email address or institutional login ID
- Class or group assignment
- Usage data within the language-learning platform
- Technical information (IP address, device type, browser version)

3.2. Data from Institutional Contacts

- Name

- Job title
- Work email address
- Work telephone number
- Contract and billing information

3.3. Automatically Collected Data

When interacting with our website or support systems, we may collect:

- Log files
- Cookies and analytics data
- Device and browser information

We do **not** intentionally collect special category data unless explicitly authorised by the institution.

4. How We Collect Personal Data

We collect data through:

- Direct communication with institutional contacts
- Account creation and onboarding processes
- Software licence activation
- Support requests and technical assistance
- Website forms and analytics tools
- Data provided by educational institutions
- Data shared by software vendors (where permitted)

5. How We Use Personal Data

We use personal data for the following purposes:

- Provisioning and managing software licences
- Delivering customer support and technical assistance
- Communicating with institutional contacts
- Monitoring service performance and security
- Managing contracts, invoicing, and renewals
- Providing training, updates, and product information
- Improving our services and user experience
- Complying with legal and regulatory obligations

We do **not** use student data for marketing.

6. Legal Bases for Processing

We rely on the following lawful bases:

- **Contractual necessity** – to provide software and support services
- **Legitimate interests** – service improvement, security, customer relationship management
- **Legal obligation** – tax, audit, regulatory compliance
- **Consent** – for optional marketing communications

For Irish customers, processing is aligned with Article 6 of the EU GDPR.

7. Sharing Personal Data

We may share personal data with:

- Software vendors and platform providers
- Cloud hosting and IT service providers
- Payment processors
- Professional advisors (legal, accounting)
- Regulatory authorities where required

All third parties are bound by GDPR-compliant agreements and strict confidentiality obligations.

We do **not** sell personal data.

8. International Transfers

We are not typically required to transfer data outside the UK or EEA.

If we were required by a Client to do so, we will ensure appropriate safeguards such as:

- Adequacy decisions
- Standard Contractual Clauses (SCCs)
- International Data Transfer Agreements (IDTAs)

9. Data Retention

We retain personal data only for as long as necessary:

| Data Type | Retention Period |
|-----------------------|--|
| Student user accounts | Duration of contract or as instructed by institution |
| Support tickets | 2–3 years |
| Billing records | 6–7 years |
| CRM/contact data | Until contract ends or consent withdrawn |
| Technical logs | 6–12 months |

Data is securely deleted or anonymised after retention periods expire.

10. Data Security

We implement technical and organisational measures including:

- Encryption of data in transit and at rest
- Role-based access controls
- Multi-factor authentication
- Regular security audits and testing
- Staff training on GDPR and cybersecurity
- Secure data-handling procedures
- Incident response and breach reporting protocols

11. Cookies and Website Tracking

Our website may use cookies and analytics tools to:

- Improve website functionality
- Analyse usage patterns
- Enhance user experience

Users can manage cookie preferences through their browser settings.

12. Data Subject Rights

Individuals have the right to:

- Access their personal data
- Rectify inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent (where applicable)

Requests can be submitted to the contact details in Section 14. We respond within **one month**.

13. Children's Privacy

As many end users are school pupils, we ensure:

- Data is processed only for educational purposes
- No direct marketing to children
- No profiling or automated decision-making affecting children
- Processing occurs only under institutional instruction

14. Contact Information

For questions or data requests, contact:

Stephen Herndlhofer

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15. Changes to This Privacy Policy

We may update this policy periodically. The latest version will always be available upon request or on our website.