Create Development - your real PE platform Privacy Policy

Create Development Limited ("Create Development", "we", "our" or "us") registered in England and Wales under company number **6476863** is committed to protecting your privacy and takes it very seriously. The sections below make up our privacy policy and explains how Create Development may collect, use, or disclose, information about you.
We assure you that your personal information will be processed in accordance with the **Data Protection Act 2018**, which incorporates the European General Data Protection Regulation (GDPR).

Any changes we make to our privacy policy in the future will be posted on the real PE website.

For the purposes of data protection legislation we are both the Data Controller and Data Processor of personal data. We acknowledge the School as Data Controller of the pupil data it provides to real PE for the purpose of using our real PE platform to support the education of pupils.
We are registered with the Information Commissioner's Office in the UK with reference number **Z3294225.**

If you have any concerns or questions about our privacy policy or your personal information, please contact us at info@createdevelopment.co.uk

The information we store:

This section describes what personal information on the data we collect and store.
'Personal information' means any information relating to an individual, which can identify them – either directly or indirectly. It can refer, amongst other things, to an identification number, or to one or more specific identifying pieces of information, such as an address.

- Organisation Name
- Organisation Address
- Teacher name, role and email in organisation
- Learner full name and group/class depending on the real PE membership you purchase
- Initial log in details (password is requested to be changed if given)
- Any information/media files you upload to your wheels. Eg Data about teachers and students
- Technical information about when and how you access and use our platforms, including your IP address browser type and operating system.

When you do any of these:
- Request real PE membership or access
- Upload any evidence, examples or data to your wheels

Any information uploaded will be at your own risk and you will be responsible for ensuring you have been given permission and are authorised to use, store and share the data.

Data retention:
Under the GDPR, data subjects are entitled to have their personal data rectified or erased.
We will require you to notify us of any such requests for rectification or erasure of a subject's personal data, if it needs to be undertaken by ourselves. Once the data has been rectified or erased, we will no longer be able to retrieve the original data.

How we use your information:

We use your information for the following:
- To allow you to access our digital platform(s)
- To allow us to manage your account(s)
- To update our internal records and generally maintain your account with us for information on the programmes and products you have purchased
- To keep a record of when and why you contact us and to keep your contact details up-to-date
- For statistical, analytical or survey purposes – so we can improve our websites and their services to you
- To prevent or detect fraud or abuses of our sites
- If you consent, to notify you of products or special offers that may be of interest to you

How to opt out from receiving marketing and newsletters:

If you sign up to our newsletter, or ask us to send it to you, we may keep you informed by post, email, text or other electronic means about our products and special offers that we think you'll like.
You have the right to ask us not to process your personal information for marketing purposes, or to change your mind at any time.

You can opt out by:
Choosing not to sign up for our newsletter and other marketing offers when you create your account. You can tell us by using our Contact Us form (don't forget to give full name and email address).

Unsubscribing from our newsletters by following the link on the newsletter (every newsletter we send you will include a link to allow you to opt out)

We'll try our best to process your request promptly, but it may take a few days for your opt-out or unsubscribe request to be changed.

Disclosure of your information:

We may disclose your personal information to our service providers who operate elements of our service and process data on our behalf. These may include businesses who provide technology services such as hosting for our servers and email distribution, and business partners who provide delivery fulfilment services. Where such disclosures are made, this will be under contractual arrangements with us and carried out in accordance with the requirements of UK data protection laws.

In addition, we may disclose your personal information to any successors in title to our business or to a buyer in the event that we or any of our assets are acquired by a third party (as your information may be one of the transferring assets).

Please note, all information/data uploaded on to the Wheels are stored on a live platform which is accessible by Create Development Employees, and temporary staff or subcontractors, they are all subject to confidentiality agreements with ourselves.
We will not disclose any confidential information unless required by law, in which case we will inform you prior to any disclosure unless prevented to by law.

How we protect your information:

This information gives details of the management of data security in relation to the use of our platforms.

The real PE platform data is securely uploaded to our Web Partners (Crystal Presentations Limited) based in Birmingham, England. The server platform is set up so that only Crystal can access the server directly, and access can only be obtained from machines with specific key files.

The data processed by Crystal is protected from unauthorised access or disclosure, they have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information they collect online. They ensure everything is password protected, TLS encrypted and only Create Development have the administration rights to the user accounts.

The assessment tool data is securely uploaded to our Web Partner (Writemedia Solutions Limited). Data is hosted in a Tier 3 data centre in Maidenhead, England.

The data processed by Wrtiemedia is protected from exposure by 24 x 7 x 365 Manned Security & Monitoring, Biometric access policies, internal and external CCTV systems, and security breach alarms, Cisco Firewalls & SSL Encryption.

In processing your data, we will use appropriate organisational and technical measures including:
- Encryption
- Pseudonymisation
- Resilient processing
- Backing up of personal data

Only the user knows their password as all passwords within the platforms are encrypted.
No user-specific data is collected by Crystal, Writemedia or any third party.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Cookies

Our cookie policy:

The sections below make up our cookies policy. By using our websites, you consent to cookies being used in accordance with this cookies policy. This policy also explains how you can opt out of the use of cookies on our websites.

What cookies are:

Cookies are small files that are downloaded onto your computer, mobile, or other device when you access certain websites. Cookies allow a website to recognise your device. They help your browser to navigate through the website by allowing you to sign in automatically and by remembering settings you selected during earlier visits (among other functions). Cookies don't harm your computer or device.
Most web browsers automatically accept cookies. Unless you've adjusted your browser settings to refuse cookies, cookies will be sent when you access our websites. Find out how to do this, in our 'How to change your cookie settings' section below.

You can learn more about cookies by visiting allaboutcookies.org.

How we use cookies:

Cookies help us to provide you with a good experience when you browse our websites. They allow you to make full use of our online shopping and personalised features.

We don't use cookies to collect or record information such as your name, address or payment details.

Here's how we use cookies:
- For essential technical reasons
- To distinguish you from other website users.
- Target advertising towards you based on what you like and what you view and search for
- To collect statistical and analytical information about how visitors use our websites – so we can improve the way our sites work and to measure the success of our competitions and campaigns
- To enable us to fulfil our contractual obligations to third parties.

The types of cookies we use:

We use both 'persistent' and 'session' cookies:
- **Persistent cookies** are stored by your browser and on your device until their set expiry date (unless you delete them first)
- **Session cookies** expire as soon as you close your web browser

We use some, or all, the following types of cookies on our sites:

Strictly Necessary Cookies: These are essential cookies. They're used to carry out requests you make when you use our sites – for example, remembering information provided by you, such as the items you've put in your shopping bag. If you choose to opt out of getting these cookies, then won't be able to use our sites properly. You'll still be able to browse, but you won't be able to put anything in your shopping bag or buy it.

Performance Cookies: These cookies allow us to collect data about the way you've used our websites, so we can record information about what you've viewed. We use these cookies to measure if our customers are getting the most from our sites. We then use this information to improve our sites and help us understand how our customers move around them. These cookies may also be provided by a third party analytic tool, but will only be used for purposes related to our websites.

Functionality Cookies: These cookies allow websites to remember choices you've previously made that are specific to you – for example your country selection, language preferences or when you choose to remain signed-in.

Targeting Cookies: These cookies remember information regarding how you've used our websites and other websites, so that we can show you promotional and other targeted information based upon the things you like and what you've searched for and viewed.

Web Beacons: We place small images or 'beacons' on many of the pages on our website and in online advertising with third parties. We use these beacons, in connection with cookies, to collect non-personal data on the usage of our website. This includes (amongst other things) the date and time of your visit, the pages you looked at, the page you came from, the type of browser, the type of operating system and the domain name of your internet service provider (ISP). This information is collected about thousands of site visits and analysed as a whole and is useful in many ways, including tracking the performance of our online advertising (such as online banner ads) and to determine where to place future advertising on other websites.

Google Analytics Cookies: Our sites use Google Analytics, a web analysis tool provided by Google Inc. ('Google'). Google Analytics uses cookies to track your use of the website. This information (including your IP address) is sent to Google's servers in the USA where it's used to prepare analysis and reports for us on the use and effectiveness of our websites. Google will not associate your IP address with any other data held by them. Visit Google Support to learn more about Google Analytics, including browser tools to prevent this tracking.

We're constantly developing our site, so the cookies we use may change from time to time. If you'd like a list of the cookies we're currently using, please use our Contact Us form.

Flash cookies: We may display video content on this website using third party sites such as Adobe and Vimeo, who may use Flash cookies to improve your experience. If you want to disable or delete a Flash cookie, please visit their global security settings.

Please bear in mind that if you disable Flash cookies you won't be able to access certain content on our website which uses their site, such as videos.

Social network cookies: If you share Create Development content on social networks, you may be sent cookies from these sites. We don't control the sending of these cookies, so we advise you to check these third-party (social sharing) websites for more information about their cookies and how to manage them.

How to change your cookie settings:

If you're not happy with the way that we use cookies then you could choose to:
- Disable cookies on your computer or device
- Delete Create Development cookies after you've visited one of our sites
- Use your browser's anonymous setting (called 'Incognito' in Chrome, 'InPrivate' for Internet Explorer, 'Private Browsing' in Firefox and Safari)

To disable (or enable) cookies:

You can enable or disable cookies in your website browser settings. How you do this will depend on which browser you're using.

Important! Our sites use cookies for technical functionality. If all cookies are disabled on your computer or device, you'll still be able to browse, but may not be able to open and download all attachments and links.

To learn how to manage cookies using the latest browser versions, you can follow these links:
- Chrome
- Internet Explorer
- Microsoft Edge
- Safari
- Firefox
- Flash Cookies

For further help, visit allaboutcookies.org

If you have any concerns or questions about our use of cookies or our cookie policy, please contact us.