

i-Nucleus

Privacy Policy

Version 2.0: These terms were last updated on 1st June 2020. They may be updated in the future and we'll post the new version on our website.

Maintaining your privacy is really, really important to us. You entrust us with sensitive information of your business and we take that responsibility seriously.

1. General Information

Sophis Educational Systems Limited ("**we**", "**us**", "**our**") takes security and privacy seriously. This Privacy Policy explains how we collect, store and use personal data when you browse www.i-nucleus.com (the "**i-Nucleus website**"), use the i-Nucleus application ("**i-Nucleus**") or otherwise provide your personal data to us. Please read this Privacy Policy carefully to understand how we will treat your personal data.

This Privacy Policy should be read together with our Terms of Service, which together apply to your use of the i-Nucleus website and i-Nucleus.

2. What information do we collect?

Your personal data

When we say your "personal data", we mean any information that identifies any person, that you provide to us during your trial period, after you subscribe, or that is contained in any other information that you provide to us (or that you authorise a third party to give to us on your behalf).

Your "personal data" may also be contained in information that we collect about you in connection with your use of the i-Nucleus website and/or i-Nucleus. The data that you enter into i-Nucleus isn't part of the "personal data" discussed here, unless it identifies a person - for more information about your data, jump ahead to the next section. When it comes to your personal data, we comply with our obligations under the General Data Protection Regulation and any other applicable data protection legislation from time to time.

Information you provide – Your personal data includes the information you provide, or that you authorise someone else to provide, when you sign up for an account or sign up to receive our emails, or when you answer questionnaires, surveys, enter competitions or provide information in your account profile, on the i-Nucleus website, or during a support enquiry about you and/or your organisation. It also includes information you provide when

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you complete any forms which you submit to us. It also includes information you upload to your i-Nucleus account.

Examples of this personal data include your name, your email address, contact and/or employee and customers names; and any correspondence when you contact us. It could also include your bank account details and bank transaction details (if it identifies a person). It could also include details in any invoices or receipts that you upload (if they identify a person).

We do not collect or process special categories of personal data, as defined under GDPR. For the provision of the services, i-Nucleus can be directed at children under the age of sixteen and you are responsible for getting parental consent for the children to access i-Nucleus.

Information we collect - We collect information about your website usage, to improve our service and to understand trends to enhance and customise content and advertisements. Some of this data may be "personal data", where it identifies a person. Here's the information that we collect and how we use it:

- We monitor patterns of usage, such as login dates and volumes of data, so we can understand how people are using i-Nucleus to develop and improve our products.
- We also monitor patterns of usage so that we can tailor any communications we may send you or advertising you may receive. For example, we may tailor your newsletter with information about product features that you haven't tried yet, instead of features that you use frequently.
- For security reasons and to aid in monitoring patterns of usage, we log your IP address when you use the website. This is your computer's individual identification number that is assigned to your computer when connected to the Internet.

Uploaded Data

In addition to your personal data, we will also hold uploaded data that you enter into i-Nucleus. Examples of your uploaded data include your organisation's invoices and payments and your clients' details.

You own all of the uploaded data you enter or upload into i-Nucleus and have ultimate control over who has access to it. Keep in mind, however, that with great power comes great responsibility - it is your job to safeguard your password and account access. Also, you need to make sure you have obtained any relevant consents or permissions necessary for you to upload any personal data to i-Nucleus and for it to be used as set out in this policy.

3. What do we use your data for?

Providing i-Nucleus - We use your personal data to enable us to register you and provide you with access to i-Nucleus and the i-Nucleus website. It will also enable us to contact you by email, fax, post, SMS, social media or telephone where necessary concerning i-

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Nucleus; to record your personal preferences; to personalise our services to you (such as by pre-populating fields to make it easier for you to provide information when you return to i-Nucleus or the i-Nucleus website). It will also enable us to produce reports you request as part of the services we provide, including regulatory reports and/or other reports.

Should you choose to use parts of i-Nucleus that involve providing your personal and/or financial data to third parties, then your personal and/or financial data will be shared in that way. Such personal and/or financial data may include for example, invoices and payments. These third parties will use that data in accordance with any consents you have given us or that you may give to us in the future.

Improving i-Nucleus - We will also use and analyse your uploaded data so that we can administer, support, improve and develop our business, customer service and the features of the i-Nucleus website and i-Nucleus generally. We will never share your data with third parties.

Providing Insights - We monitor anonymous, aggregated information about account and uploaded data so that we can produce insights. For example, based on an anonymous, aggregate data analysis, we may produce a white paper that reports the average number of students in a class room in an educational centre. We may share these insights with customers, on our blog or other promotional material, use them internally to improve our product and communications, or share with other interested third parties. Just to be clear - we will never identify you or your business in such communications or white papers and will never report data in such a way that your business could be identified.

Contacting you for Marketing Purposes - We may use your personal data to contact you by email, fax, post, SMS, social media and/or telephone to let you know about our other i-Nucleus and/or third party services, content, offers or product ranges which may be of interest to you. We may also use your financial data to enable us to tailor these notifications (in order to make sure what we are sending you is relevant). We will only use your data in this way where you have provided consent, we have legitimate business reasons for doing so, or where we are otherwise entitled by law to do so. If you would like us to stop providing you with such notifications, just contact us using the details below. Please note, this may take up to one working day to take effect. To stop receiving emails from i-Nucleus itself (for example, a reminder that your subscription is expiring), you should cancel your i-Nucleus account.

We may contact you if the specific arrangement we have in place with a third party which impacts you is changing and / or coming to an end and to let you know what will take place next.

Cookies - We may further use, or permit selected third parties to use, your personal data to enable us to track and analyse i-Nucleus website traffic and visitor trends, improve your browsing experience and to personalise and enhance the content and advertising we display. For further details, please see Section 11: Use of Cookies below.

Legal Requirements – We may use your personal data to comply with any legal obligations to which we are subject.

We shall periodically check that the personal data we store for you is accurate. If you would like to update the personal data we hold about you, please login to your i-Nucleus account or contact us at email@i-nucleus.com with your request.

4. Why do we use your personal data?

We collect and use your personal data for a variety of reasons. We need some data to enter into and perform our contract with you and provide you with access to i-Nucleus – for example your contact details and other information requested during the i-Nucleus setup process. If you fail to provide such data we will be unable to provide our service to you. Other information we collect because we have legitimate business interests, for example, in:

Ensuring that we can onboard you as a customer and manage your account;

- Understanding how our customers use our products, services and websites;
- Understanding and responding to customer feedback;
- Researching and analysing the services our customers want;
- Improving our product and better understanding how our customers use it.

In some circumstances we may process your personal data because it is required for compliance with a legal or regulatory obligation.

5. Who do we share your information with?

So that we make it clear once again, we do not share your information with any third party.

6. How long do we store your data for?

We only store your data for as long as necessary for the purposes of processing set out in this policy. When you cancel your account with i-Nucleus, you can either delete your data immediately, or we will automatically delete your data within 180 days.

If you are signed up to marketing communications, cancelling your i-Nucleus account will not cancel your marketing preference. If you would like to unsubscribe, please email email@i-nucleus.com.

To ensure the integrity of our systems and your data, we utilise various technologies to continually take secure, encrypted backups. Data remains archived within these backups and these are maintained according to our defined two-year data retention policy, after which they are removed.

7. You can export your data at any time

You can export a copy of your data whenever you like - this will include your personal data and that of your clients, contacts and suppliers and your financial transactions. We recommend that you use the export functionality to keep a backup of your data. While we regularly back up your data (see our **Security Section**), we can't restore backups on an individual basis. You can also ask us for a copy of your personal data that we hold (see Section 10: What are your rights? below).

8. You can delete your data at any time

You have the option to delete all of your data at any time, using the "Delete all data" option in the settings area of i-Nucleus. You can use this option before cancelling a i-Nucleus account, or to reset i-Nucleus after loading test data during your free trial. After you delete your data, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems. Generally, we will retain your uploaded data and personal data for a reasonable period, or for as long as the law requires.

We highly recommend that you export your data before cancelling, since many countries (including the UK) require you retain your business records going back many years, even if you have finished trading.

If your free trial expires, your account is not automatically cancelled within our system. We will retain historical details about your payments to i-Nucleus for accounting purposes because we need to do so by law.

9. We don't store your credit card details

Once your free trial is over, you need to provide payment details to start your subscription and continue using i-Nucleus. This information can be passed directly to our payment service providers over an encrypted link and is never stored on our system. We handle ongoing billing by passing a request to our payment service providers.

10. What are your rights?

- 1. Access to your personal data:** You can ask us to confirm if we are processing your personal data and you may request a copy of your personal data by contacting our support team at email@i-nucleus.com.
- 2. Right to change or withdraw your consent:** Where you have given us consent to make use of your personal data for any of the purposes outlined in this policy, you may withdraw that consent by contacting us using the details located at section 14 of this policy. If you wish to change your contact preferences or no longer wish to be contacted for marketing purposes, email us at email@i-nucleus.com.
- 3. Right to Rectification:** You may ask us to update out of date or inaccurate information we hold about you. To do so, please log on to your i-Nucleus account and update your information or email us at email@i-nucleus.com.

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4. **Right to Erasure:** In certain circumstances you may ask us to erase your Personal Data. If you would like us to erase the personal data we hold about you, please email us at email@i-nucleus.com, specifying why you would like us to do so.
5. **Right to Data Portability:** In certain circumstances you may ask us to provide you with the personal data that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such personal data to another data controller. You can use the Export All Data functionality at any time to export your data.
6. **Right to object:** In certain circumstances you may object to our processing of your personal data. Please email us at email@i-nucleus.com.
7. **Right to restrict processing:** You can ask us to restrict the processing of personal data we hold about you in certain circumstances. Please email us at: email@i-nucleus.com.
8. **Make a complaint:** You may make a complaint about our data processing activities to a supervisory authority. In the UK this is the Information Commissioner's Office (ICO). Further details can be found on their website at <https://ico.org.uk>.
9. **Getting in touch:** To make enquiries and/or to exercise any of your rights in this privacy policy please contact our support team at email@i-nucleus.com.

11. Use of cookies

Cookies are small files saved to your device that track, save and store information as well as your interactions and usage of our services. The primary purpose for our use of cookies is to allow us to provide a smooth, efficient and personalised experience for our users both on and off our website through remembering your preferences, storing passwords if you request it and serving you more relevant advertising.

If you want to manage or disable cookies for the i-Nucleus website or any other site, you can do it by changing your browser settings. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

12. Security and data storage

We take security and privacy seriously. We will endeavour to take all reasonable steps to keep your personal and financial data secure once it has been transferred to our systems. We adopt appropriate, industry standard data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction. For further details of the some of the security measures we have implemented, please see our Security Policy.

Where we utilise third parties to help provide our services, we will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements we ourselves impose and expect, as a minimum.

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Where we have given you (or where you have chosen) a password which enables you to access certain parts of the i-Nucleus website or i-Nucleus itself, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Please note that the internet is not a secure medium and although we will do our best to protect your data, we cannot guarantee the security of any data transmitted to the i-Nucleus website or through i-Nucleus itself. Any transmission is at your own risk.

13. Changes to this privacy policy

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know and update the 'last updated' header at the top of this page.

This Privacy Policy was last amended on 1st June 2020.

14. Getting in touch

If you have any queries relating to this Privacy Policy or i-Nucleus's use of your personal or financial data, please contact via email through [**email@i-nucleus.com**](mailto:email@i-nucleus.com) or by writing to us at 183-189 The Vale, Acton, London, W3 7RW, United Kingdom.