Data Protection Summary

1. Coverage

This document provides a summary of the Data Protection measures in place for Atom Learning's School product suite.

There are some additional documents that should be reviewed in conjunction with this summary:

→ AP-2.1 - Atom Learning - Data Protection Factsheet
→ AS.3 - Atom School - Data Processing Agreement

The Data Protection Factsheet and this summary should be used to complete any Data Protection Impact Assessment (DPIA) that the Data Controller may need to carry out.

The Data Processing Agreement is our legal agreement with the Data Controller and sets out the terms of our relationship with the Data Controller as a Processor.

2. Introduction

2.1. Definitions

School customer - the school, institution, or company that has purchased the Atom School product.

School end-user - a student who uses Atom School to complete assessments and homework set by the School customer.

School supervisor - a parent or guardian who is allocated to a student and reviews their progress on the Atom School platform.

2.2. What is the GDPR?

The GDPR is a regulation under EU law on data protection which sets out a comprehensive framework relating to the processing (i.e. collection, use, storage, and disclosure) of personal data within the European Union.

The Data Protection Act 2018 is the UK law which implements the GDPR, with some UK-specific alterations. Despite the UK leaving the European Union, the rules and regulations set out in the GDPR still apply through this UK law.

The [Information Commissioner's Office](#) is a good source of information on GDPR and the UK law surrounding it.

Any references to "GDPR Compliance" in our documentation specifically refer to compliance with the Data Protection Act 2018 in the UK, although this is compatible with the wider GDPR across the EU.

2.3. Contact Details

Atom Learning Ltd can be contacted regarding any GDPR queries at: gdpr@atomlearning.com

3. Data Collection and Processing

3.1. Types of Data

This section lists each piece of personal data that we collect.

We do not collect or store any sensitive or special categories of personal data (e.g. health, financial records etc).

Data	Justification and Use
Student's full name	So we can address them correctly in the app
Student's date of birth	Required for age-based scoring
Teacher's name	So we can address them correctly in the app
Teacher's work email address	Used for login & communication
Guardian's full name	So we can address them correctly in the app
Guardian's email address	Used for login & communication

3.2. Lawful Basis for Processing

As the Data Processor, Atom cannot determine or justify the overall lawful basis for processing data on the School platform.

We process personal data as directed by our contract with the School customer (the Data Controller) who should establish and document the lawful basis for processing the student data in their possession. The processing is governed by our Data Handling Agreement with the customer.

3.3. Children Under 16

As Atom is a product providing learning materials for children, we are required to store and process data from children under 16.

We also have robust safeguarding procedures and policies in place to ensure all of our students experience Atom in a safe way.

3.4. Cookies

We use cookies for essential functionality on the Atom platform (e.g. registering authenticated sessions). The platform also implements some 3rd party cookies.

The platform also collects some data on user behaviour within the app which is used to assess the effectiveness of features as well as gradual rollouts of updates. No personal data is used in this tracking.

3.5. Marketing

Atom does not use any of the personal data supplied to us by School customers for the purposes of direct or indirect marketing to School end-users.

We do have other products (for use at home) which some School end-users may also use, and therefore these people may receive marketing material from us through their membership in our other products.

We may contact employees of our School customers (e.g. teachers) about product updates or other information that may be relevant to them and their use of the School platform. As a Business-to-Business (B2B) interaction, this communication is carried out in accordance with the PECR 2003.

3.6. Anonymised Processing

Atom uses machine learning algorithms to score students and grade questions. This process involves processing student response data to establish relative difficulties of questions and abilities of students.

No personal data is stored in the database that is used for machine learning. Instead, each student is referred to by a unique identifier. This identifier allows the data transfer process to correctly transfer scoring data back into the main database after processing.

Atom Learning