



PRIVACY POLICY

INTRODUCTION

Nautilus Education Ltd (“Nautilus”/“we”/“our”) is committed to protecting and respecting your privacy. We want to explain to you how we manage and use any personal data that you provide to us in accordance with the General Data Protection Regulation (EU) 2016/679 “the GDPR” and the Data Protection Act 2018 (together the “Data Protection Legislation”).

For the purpose of the Data Protection Legislation, Nautilus acts as a data processor when providing services to your school, which is the data controller. We also act as a data controller ourselves outside of providing our services and this privacy policy addresses our use of personal data as a data controller. Please see our [terms and conditions](#) for details on our contractual commitments when we process data as a data processor.

THE TYPES OF PERSONAL DATA WE COLLECT

- Contact information - The school administrator adds the names to the system. This includes first name, second name and work email only.
- Communication data relating to enquiries made about our services or customer support issues.
- Pupil photos and videos may be processed where explicitly authorised by the Controller and in accordance with applicable data protection law.

Use of Photographic and Video Data

USE OF PHOTOGRAPHS AND VIDEO

Where the Controller uploads or records photographs or videos of identifiable individuals (e.g. staff or pupils), such media is treated as personal data under the Data Protection Legislation.

We will only process such data:

- On documented instruction from the Controller
- For purposes directly related to the provision of the platform (e.g. safeguarding, observation, or reporting)
- With appropriate technical and organisational safeguards in place

We do not use biometric recognition or facial analysis technologies. All media is stored securely and retained only for as long as necessary for the specified purpose

HOW WE USE YOUR INFORMATION

We may use your personal data for the following reasons:

- Managing our relationship of customer and service provider such as to provide notifications on new updates or to provide tailored features that will optimise and personalise your experience.
- Managing enquiries into our services from prospective customers.

- Marketing, including updating your marketing preferences.
- To collect technical data about visits to our website including usage.

Where your school has not subscribed to our service you can choose to opt out of any marketing communications from us at any time. Where a school has subscribed, we aim to give as much choice to communications as possible but will always be required to send communications which are relevant to the provision of the services.

When we process your personal information as a data controller, we recognise that we are required under the Data Protection Legislation to have a “legal basis” for processing. In processing your data in the above ways, we are relying on the following –

- Processing is necessary for the purposes of our legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.
- We may also need to process your personal data where there is a legal obligation to do so.

We may use artificial intelligence (AI) technologies, including services provided by OpenAI, to support the analysis of lesson observation data uploaded or recorded by the Controller. This processing enables the identification of pedagogical patterns, enhances reporting functionality, and informs leadership and professional development strategies within the school.

Where personal data is involved, such processing is conducted under documented instruction from the Controller, in accordance with applicable data protection law. Outputs generated by AI are used solely for educational improvement purposes and are subject to appropriate technical and organisational safeguards. No automated decision-making is undertaken that produces legal or similarly significant effects on individuals

SPECIAL CATEGORY PERSONAL DATA

Certain forms of personal data are subject to specific protection or restriction by law under the GDPR. For these purposes, “Special Category” personal data is data relating to: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership information, genetic data, biometric data, and data concerning health or sex life or sexual orientation. We will not process any Special Category personal data.

DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

We may share your personal data with third parties primarily in circumstances where it is necessary to provide the services and/or carry out communication and marketing activities. This includes:

- Third party software providers (e.g. Amazon Web Services)
- Professional advisers (e.g. lawyers or IT experts)

If any of our third party providers have servers which are located outside of the UK/EEA, we ensure that the appropriate safeguards are in place to permit such transfers.

COOKIES

Like many organisations, our web servers (computers that host websites) place a “cookie” (a small data file) on the hard drive of your computer when you first connect to our site. This allows us to recognise your computer on return visits and helps us study traffic patterns on our website, to improve the site and the services that we provide.

HOW WE LOOK AFTER YOUR INFORMATION

Our internal procedures cover the storage, access and disclosure of your information. We ensure that the appropriate technical and organisational measures are in place to protect data, proportionate to the level of risk associated with the processing.

RETENTION OF PERSONAL DATA

The length of time we will hold personal data will vary and will be determined in accordance with relevant Data Protection Legislation.

For pupil photographs and videos, retention is determined by the Controller’s instructions and the purpose for which the media was uploaded.

YOUR RIGHTS

You have legal rights in relation to the personal data about you we hold as a data controller. These rights are subject to conditions and limitations and therefore might not be available in all circumstances.

- the right to obtain information regarding the processing of your personal data and access to the personal data about you that we hold
- where consent was provided for certain processing activities, the right to withdraw your consent to the processing of your personal data at any time.
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that data to a third party where this is technically feasible
- the right to request that we rectify your personal data if it is inaccurate or incomplete
- the right to request that we erase your personal data in certain circumstances
- in certain circumstances, the right to request that we restrict our processing of your personal data
- the right to lodge a complaint with a supervisory authority (the Information Commissioner’s Office in the UK)
- the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, or by contacting us

You can exercise these rights at any time by [making an enquiry](#).

CHANGES TO THIS PRIVACY POLICY

Please note that we may change this privacy policy from time to time. All updates and amendments are effective immediately upon notice, which can include posting a revised version of this privacy policy or other notice on our [website](#).

This privacy policy was last updated on 1 January 2023

OUR DATA PROTECTION OFFICER (DPO)

David Rushby

In partnership with HY Solicitors