

# PRIVACY POLICY

Last updated August 16, 2024

This privacy notice for jSuite ('we', 'us', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you:

Visit our website at [jgrade.appserver.uk](http://jgrade.appserver.uk), or any website of ours that links to this privacy notice.

Engage with us in other related ways, including any sales, marketing, or events.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you still have any questions or concerns, please contact us at [privacy@appserver.uk](mailto:privacy@appserver.uk).

## SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

- **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. [Learn more about personal information you disclose to us.](#)
- **Do we process any sensitive personal information?** We may process sensitive personal information when necessary, with your consent or as otherwise permitted by applicable law. [Learn more about sensitive information we process.](#)
- **Do we collect any information from third parties?** We do not collect any information from third parties.
- **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. [Learn more about how we process your information.](#)
- **In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties. [Learn more about when and with whom we share your personal information.](#)
- **How do we keep your information safe?** We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. [Learn more about how we keep your information safe.](#)
- **What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. [Learn more about your privacy rights.](#)
- **How do you exercise your rights?** The easiest way to exercise your rights is by visiting [jgrade.appserver.uk/data-request](http://jgrade.appserver.uk/data-request), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy notice in full.

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## 1. WHAT INFORMATION DO WE COLLECT?

**In Short:** We collect personal information that you and academic staff provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us. Additionally, academic staff may provide personal information to us as part of their engagement with our Services.

**Automatic Enrolment of Students:** Students are automatically enrolled in the Services based on legitimate interest, without the need for separate registration.

**Sensitive Information:** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Student Grades
- Written Feedback Comments

All personal information that you or academic staff provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

**In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- Grade Prediction. We process your information, including academic performance data, assessment results, and other relevant factors, to forecast potential grades or academic outcomes. This helps us provide personalised support, identify areas where additional assistance may be needed, and improve the overall educational experience. The insights derived from grade prediction may also be used by academic staff to tailor their teaching approaches and interventions.

## 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

**In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

**Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.

**Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

**Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

**Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

## **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

**In Short:** We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

**In Short:** We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## **6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?**

**In Short:** We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, 'AI Products'). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this privacy notice govern your use of the AI Products within our Services.

### **Our AI Products**

Our AI Products are designed for the following functions:

- AI predictive analytics
- AI research
- AI automation
- AI applications

### **How We Process Your Data Using AI?**

All personal information processed using our AI Products is handled in line with our privacy notice and our agreement with third parties. This ensures high security and safeguards your personal information throughout the process, giving you peace of mind about your data's safety.

## 7. HOW LONG DO WE KEEP YOUR INFORMATION?

**In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than thirty six (36) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 8. HOW DO WE KEEP YOUR INFORMATION SAFE?

**In Short:** We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 9. DO WE COLLECT INFORMATION FROM MINORS?

**In Short:** We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [privacy@appserver.uk](mailto:privacy@appserver.uk).

## 10. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Switzerland, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

If you have questions or comments about your privacy rights, you may email us at [privacy@appserver.uk](mailto:privacy@appserver.uk).

## 11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 12. DO WE MAKE UPDATES TO THIS NOTICE?

**In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this privacy notice. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at [privacy@appserver.uk](mailto:privacy@appserver.uk).

## 14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of the United Kingdom, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information email us at [data-request@appserver.uk](mailto:data-request@appserver.uk).