

# Data Privacy and Security FAQs



April 2024

At 3P Learning we build better ways to learn. We understand the trust placed by our customers in how we administer personal information. Our learning resources and programs collect, process and operate with personal information in accordance with our [Privacy Policy](#) and these Data Privacy and Security FAQs.

You can contact us with any questions at [privacy@3plearning.com](mailto:privacy@3plearning.com)

## Our learning programs for Home



## Our learning programs for Schools



All our programs are owned and operated by 3P Learning companies.

### 1. Who are the companies that process personal information?

#### Licensor / Owner

Mathletics, Writing Legends, Storyathon	3P Learning Limited	(Australia)
Reading Eggs, MathSeeds, Wordflyers	Blake eLearning Pty Ltd	(Australia)
Brightpath Progress	Pairwise Pty Ltd	(Australia)

#### Distribution

3P Learning UK Limited	(UK)
3P Learning Inc	(US)
3P Learning Canada Limited	(Canada)

All companies are part of the 3P Learning group of companies

### 2. Is the 3P Learning head office in Australia?

Yes, our head office is in Australia.

### 3. Does 3P Learning hold ICO Registration?

3P Learning UK Limited holds ICO Registration Z2188515.

### 4. Does 3P Learning adhere to UK GDPR or EU GDPR Standard Contractual Clauses?

Yes, we do. Please contact [privacy@3plearning.com](mailto:privacy@3plearning.com) for more info.

☎ 1300 850 331 | 📠 1300 762 165

✉ [customerservice@3plearning.com.au](mailto:customerservice@3plearning.com.au)

🏠 **Registered Office:** 655 Parramatta Road, Leichhardt, NSW 2040

🌐 [www.3plearning.com](http://www.3plearning.com)



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## 5. When providing support where are 3P support staff accessing personal data from?

We provide regional support from our locations in Australia, New Zealand, United Kingdom, Canada and United States. Customer enquiries may be referred to our Australian office to enable us to respond, however the regional offices can refer these without personal data at your request.

**Brightpath Progress:** This program is available to schools only. The processing of data in the program (including personal data) is also supported by staff located in Australia.

## 6. How do you collect personal information?

<b>Account subscriptions:</b> The school or parents can provide personal information to apply and activate the School or Home subscription.	<b>Program Users (includes student data):</b> Details of the adult and student users are provided to the relevant learning program by the school or parent. How student names (or pseudonyms) are used can be administered by the school or parent.
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## 7. What types of personally identifiable information do you collect and process? What is the purpose of the collection?

<b>Account subscriptions:</b> From the school or parent we collect and process: <ul style="list-style-type: none"><li>- Name;</li><li>- School (if applicable);</li><li>- Country</li><li>- Student name/s;</li><li>- contact details (phone, address, email)</li></ul> For teaching and administration users, additional contact details including email and address is also used.  <b>Purpose</b> The personal information is used to administer the subscription and program features or respond to questions and enquiries. We may also send newsletters and marketing if we are permitted to.	<b>Program Users (includes students):</b> From the school or parent, we collect and process: <ul style="list-style-type: none"><li>-Name or initials,</li><li>-School (if applicable),</li><li>-Country</li><li>-Grade, Age, Year Level</li></ul> Certain learning activities allow a free-text response to be entered however personal information is not requested. Our learning programs can be used with pseudonyms.  <b>Reading Eggs: (School account feature only)</b> Teachers may create a Read Aloud activity which agrees the recording of student audio is created for the teacher to assess reading fluency. Audio files can be deleted at any time and are automatically deleted after 24 months if not earlier.  <b>Brightpath Progress: (School account feature)</b> Student's data may include date of birth for program data given to the teacher and school.  <b>Requested features (School account feature)</b> We do not enable services with third parties (like class rostering) unless we agree with the school.  <b>Purpose</b> The personal information is used to administer learning program features. For students these include learning activities, certificates, and leaderboard rankings. For parents/teachers, features can include student results and progress, and class and school data, if enabled.
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## 8. Do you engage third party services providers to develop your programs and solutions?

We develop our programs here at 3P Learning.

## 9. Where is your data hosted?

We use Microsoft Azure and Amazon Web Services (AWS) for data hosting and storage as follows:

<p><b>Reading Eggs, Mathseeds, Wordflyers, Writing Legends</b></p> <p>Live data: USA (AWS) Back up: Australia (AWS)</p>	<p><b>Mathletics</b></p> <p>Live data: USA (Microsoft Azure) Back up: West Europe (Microsoft Azure)</p>
<p><b>Brightpath Progress</b></p> <p>Live data: Australia (AWS) Back up: Australia - VIC (AWS)</p>	<p><b>Writing Legends, Storyathon</b></p> <p>Live data: Australia and USA (Microsoft Azure) Back up: West Europe (Microsoft Azure)</p>

## 10. What physical access controls are in place at the locations from which data may be stored?

Microsoft Azure and Amazon AWS Data Centres are all subject to ISO27001 certification, and equivalent physical access control requirements.

## 11. Is the data contained within your Solution encrypted in transit?

Yes, for all programs this is AES-128 or higher, with Mathletics at AES-256 or higher.

## 12. Do you engage third party services or technologies that access or process personal data?

We use services and technologies for account and subscription administration, and/or to support the delivery of learning programs (refer to our Privacy Policy for more information).

The processing of personal data is assisted by the service providers we appoint and monitor, and we review their data processing terms. These services are summarised below and can be updated:

<p><b>Account &amp; subscriptions administration (teachers and parent data)</b></p> <p>Customer management, CRM</p> <ul style="list-style-type: none"> <li>• Salesforce (US)</li> <li>• Salesloft (US, EU)</li> <li>• Mailchimp (US/Global)</li> <li>• Freshworks (US/Global)</li> <li>• Zoho (US/Global)</li> </ul> <p>User Guidance onboarding features</p> <ul style="list-style-type: none"> <li>• Hotjar (EU)</li> <li>• VWO (US/Global)</li> <li>• Userpilot (US)</li> <li>• Walkme (US/Global)</li> </ul> <p>If we agreed with a School's request:</p> <ul style="list-style-type: none"> <li>• Clever (US)</li> </ul>	<p><b>Learning Programs (in-program teacher and student data)</b></p> <p>If we agree with the School's request:</p> <ul style="list-style-type: none"> <li>• Clever (US)</li> </ul>
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<p><b>Account &amp; subscriptions administration (teachers and parent data)</b></p> <p>Website technologies: We use web analytic tools on our website such as google analytics or LinkedIn, that may use cookies or process data (IP address or other identifier data) subject to user device settings.</p> <p>These are for our websites to review functionality, user experience and analysis if how our websites are engaged. Cookie consents can be withdrawn by users.</p> <p>General Office applications: Microsoft (US), Netsuite (Aus)</p> <p>Payments Chargebee (US, Global) We do not access or store any credit card data.</p>	<p><b>Learning Programs (in-program teacher and student data)</b></p> <p>Website technologies (in-program sites) We may use third party web analytic tools on our website from time to time to check the performance and operations of our programs and services for education purposes. This reviews program usage activity rather than any individual identity information, and no student data is used for other purposes. Teacher and parent interfaces and sites may connect to retargeting or account subscription processes.</p> <p>An example of website technologies using limited processing of information includes added identifiers for successful login to assist user experience or program performance and function. These technologies that help us with this may include Google Analytics (US) and Posthog (US, EU). By using our services, the school and parents confirm the user consent to our program operations.</p>
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### 13. Does 3P Learning share personal information with third parties?

No school, teacher or student personal information data is shared with any third parties without consent. The consent we collect during subscription only allows us to process personal information as we set out in our Privacy Policy or as required by law.

We may retain and use anonymous and aggregated information for performance reporting, benchmarking and analytic purposes and for product and service improvement.

### 14. Does 3P Learning share or sell information to advertisers?

No, absolutely not. We do not sell any data to advertisers (whether personal, anonymous or aggregated).

### 15. How long do you retain data for?

Data that contains personally identifiable information is retained for a reasonable time after the subscription, and after that we permanently anonymise records to remove personal information. Back up data policies may apply and such data is generally inaccessible. We promptly process the right to be forgotten, users can email us directly at [privacy@3plearning.com](mailto:privacy@3plearning.com).

### 16. Does your solution include access controls to ensure only your authorised staff have access to the data? What access controls are in place?

Yes, via role-based access control (RBAC)

### 17. Do you regularly conduct reviews of user access levels?

Yes, user access is regularly audited

### 18. How frequently do you conduct vulnerability & penetration testing?

Every 6-12 months

## 19. Do you regularly review audit logs?

Yes

## 20. Do you conduct regular security training for all staff?

Yes

## 21. Do you conduct investigations into security breaches and implement remediation strategies?

Yes

## 22. Do you notify your customers of any security breaches?

Yes, we inform any impacted customers at the same time we notify any authorities upon becoming aware of any notifiable security breaches.

## 23. Does the solution provide unique usernames and passwords for end users?

Yes

## 24. What is the SLA for the availability of the Solution?

At least 99.9% uptime

## 25. How to contact 3P Learning for support

You can send questions about our Data Privacy and Security FAQs to [privacy@3plearning.com](mailto:privacy@3plearning.com). For other enquiries, you can visit our [website](#) or contact the relevant regional offices at the details below:

Region:		
<b>Asia Pacific</b>	<b>Australia</b> 3P Learning Limited ABN 50 103 827 836	<b>Registered Offices:</b> 655 Parramatta Road Leichhardt NSW 2040 Australia 1300 850 331 or +612 9019 2800 <a href="mailto:Customerservice@3plearning.asia">Customerservice@3plearning.asia</a>
	Blake eLearning Pty Ltd ABN 64 140 998 821	
<b>Canada, US and across the Americas</b>	<b>Canada and US</b> 3P Learning Canada Limited 3P Learning Inc	+1 877 467 6851 <a href="mailto:Customerservice@3plearning.ca">Customerservice@3plearning.ca</a>
		For US customers: <a href="mailto:Support.use@3plearning.com">Support.use@3plearning.com</a>
<b>UK, Europe, Africa and the Middle East</b>	<b>United Kingdom</b> 3P Learning UK Limited (ICO Registration Z2188515) Company no. 05919214	+44 117 370 1990 <a href="mailto:Registrations@3plearning.co.uk">Registrations@3plearning.co.uk</a>

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