

SchoolGrid Ltd  
5 South Charlotte Street,  
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# Privacy Policy

Version 1.6

For more information, please call:

SchoolGrid Support  
01506 300310

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## Background

SchoolGrid Ltd understands that your privacy is important and cares how your personal data is used. We respect and value the privacy of everyone who visits schoolgrid.co.uk (“Our Site”). We will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the UK GDPR and the Data (Use and Access) Act 2025. By using Our Site, accepting our terms and conditions, and submitting information to Us, you are deemed to accept and agree to the terms of this policy

## 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

- “Account”: means an account required to access and/or use certain areas and features of Our Site.
- “Cookie”: means a small text file placed on your computer or device by Our Site.
- “Cookie Law”: means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- “Personal Data”: means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data, incorporating definitions provided in the Data Protection Act 2018 and the UK GDPR
- “We/Us/Our”: means SchoolGrid Ltd, a limited company registered in Scotland under company number SC333369.

## 2. Information About Us

Our Site is operated by SchoolGrid Ltd. Our registered address is 5 South Charlotte Street, Edinburgh, EH2 4AN.

## 3. Data Protection Officer

Our designated Data Protection Officer is Gary Clark, who serves as the primary point of contact for privacy matters. He can be reached via email at [dataprotection@schoolgrid.co.uk](mailto:dataprotection@schoolgrid.co.uk), by telephone at 01506 300310, or by post at our Edinburgh address

## 4. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. We have no control over how your data is collected, stored, or used by third-party websites linked from Our Site, and we advise you to check their privacy policies

## 5. Your Rights

As a data subject, you have the following rights under the UK GDPR and the Data (Use and Access) Act 2025:

- The right to be informed about Our collection and use of personal data.
- The right of access to the personal data We hold about you.
- The right to rectification if any personal data is inaccurate or incomplete.
- The right to erasure (the right to be forgotten).
- The right to restrict processing or object to the use of your data for specific purposes.
- The right to data portability.
- Rights regarding automated decision making and profiling.

## 6. What Data Do We Collect?

Depending on your use of Our Site, We may collect:

- Identification & Contact: Name, email address, and telephone number.
- Technical Data: IP address, browser type, and activity logs.
- Special Category Data: We process pupil nutrition and allergy information. Under Article 9(2)(g) of the UK GDPR and the Data (Use and Access) Act 2025, this is processed as a Recognised Legitimate Interest for safeguarding and emergency response, as it is in the Substantial Public Interest to ensure pupil safety.

## 7. How Do We Use Your Data?

We use your data for contract performance, legal obligations, or legitimate interests. Specifically:

- Managing your Account and providing access to Our Site.

- Supplying services, including school meal ordering and cashless payments.
- Handling support tickets via our internal Zoho Desk and Ring Central systems.

Personal data may be provided directly by you, while other data—specifically pupil information, parent/guardian names, and contact details—may be provided to us directly via your child’s school. Schools utilise our software to conduct essential school functions, including:

- Allowing parents and guardians to control their child’s school meal service.
- Providing critical nutrition and allergy information to parents and guardians.
- Contacting parents and guardians, including in case of emergency.
- Providing cashless payment options and a means to submit feedback regarding the catering service.

Under the Data (Use and Access) Act 2025, pupil nutrition and allergy information is processed as Special Category Data on the basis of Substantial Public Interest. This allows the school to fulfil its legal obligations to safeguard pupils without requiring separate explicit consent for these critical health-related functions.

You have the right to withdraw consent or request deletion at any time by contacting our DPO.

## **8. How and Where Do We Store Your Data?**

- All primary application and user data is stored securely within the UK using Microsoft Azure.
- Support tickets, customer queries, and call-routing data are processed and stored via Zoho Desk and Ring Central servers in the EU.
- We maintain ISO 27001 Security Management Standards to protect your information and ensure rigorous internal management.
- In specific administrative scenarios, some data (such as email) may be stored on Google Workspace servers in the EU.

Data security is paramount; we have taken suitable measures to safeguard and secure data collected through Our Site, including meeting ISO 27001 Standards, rigorous internal management, and regular testing . Your personal data is primarily stored within the UK. Where data is shared outside the UK/EEA (e.g., via Google Workspace), we ensure it receives an

equivalent level of protection by requiring partners to meet ISO standards and utilising Standard Contractual Clauses (SCCs) or the UK International Data Transfer Addendum.

All personal data is processed and stored securely, for no longer than is necessary. Our use of your data will always have a lawful basis, such as contractual necessity or our legitimate interests in providing a safe school meal service. Where no legal override exists, we will securely remove or anonymise data no longer than 12 calendar months following the deactivation of pupil and parent accounts by the school office. If you use our payment options, we are legally required to keep transaction details for 6 years to comply with UK tax and audit laws. Certain Direct Debit mandate information is retained for the duration of your active mandate and for a period thereafter as required by the Direct Debit Guarantee and financial regulations.

## **9. Do We Share Your Data?**

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

We may sometimes contract with third parties to supply services to you on Our behalf, such as card payment processing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We do this to ensure that our site performs well and to identify any software issues.

We may from time to time share such data as described above with third parties such as prospective investors, school caterers (where they are contracted to provide food services at your child's school), and partners. Data will only be shared and used within the bounds of the law. We do not share your data for marketing purposes.

We use the following third-party processors:

<b>Third Party</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Microsoft Azure	Primary cloud infrastructure, application hosting, and database storage.	<a href="#">Microsoft Privacy</a>
Zoho Suite	Internal support ticket handling and email routing. General communications e.g. new releases and for client management	<a href="#">Zoho Privacy</a>
Ring Central	Telephone support system integrated with Zoho Desk.	<a href="#">RingCentral Privacy</a>
FastPay	Direct Debit payment processing.	<a href="#">FastPay Privacy</a>
Elavon	Credit Card processing.	<a href="#">Elavon Privacy</a>
Google Workspace	Hosting internal documents and email.	<a href="#">Google Privacy</a>
Esenda	Credit Card Processing	<a href="#">Esenda Privacy</a>

From time to time, we may expand or reduce our business, which may involve the sale or transfer of control of all or part of our business. In such an event, relevant personal data will be transferred to the new owner, who may use it only for the original purposes. You will be contacted in advance of any such transfer and given the choice to have your data deleted or withheld from the new owner.

## **10. How Can You Access Your Data?**

You have the legal right to request a copy of any personal data We hold about you, a process known as a Data Subject Access Request (DSAR). We are committed to making this process as straightforward as possible:

To obtain a copy of your data, please email our Data Protection Officer at [dataprotection@schoolgrid.co.uk](mailto:dataprotection@schoolgrid.co.uk) or write to us at our Edinburgh address. To help us find your information quickly, please specify if you are looking for specific records (such as support tickets or payment history). To protect your privacy and prevent unauthorised access to your information, we may ask you to provide proof of identity before we release any data.

We will provide all information in response to your request free of charge. We aim to respond to your request within one month. However, under the Data (Use and Access) Act 2025, if your request is complex or we require further clarification to locate your data, we may "stop the clock" on this one month period. The countdown will resume once we have received the necessary clarification from you.

We will conduct a "reasonable and proportionate" search of our systems to identify relevant data. This means we will look in the places where your data is most likely to be stored, such as our primary databases and support systems like Zoho Desk. We will typically provide your data in a commonly used electronic format (such as a CSV or PDF) unless you request otherwise. Please note that we may need to redact certain information if it contains the personal data of other individuals.

For further information regarding your rights or how to make a request, you can also contact the Information Commissioner's Office (ICO) or your local Citizens Advice Bureau.

## **11. Our Use of Cookies**

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third Party Cookies are used on Our Site for ensuring the visitor gets the best user experience and allows us to understand how our site is used. For more details, please refer to Section 7. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. All Cookies we use are shown below. Your consent will not be sought to place “strictly necessary” Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below or using the sites listed above, but please be aware that Our Site may not work properly if you do so.

We have taken great care to ensure that your privacy is not at risk by allowing them. The following Cookies may be placed on your computer or device:

<b>Cookie Name</b>	<b>Used By</b>	<b>First / Third</b>	<b>Type</b>	<b>Purpose</b>	<b>Retention/ Expiry</b>
SchoolGrid_session	website	First	session	Session	session
SchoolGrid_auth	website	First	session	Authentication	session
ai_user	website	First	Persistent	Performance - Microsoft Application Insights software	1 Year
ai_user	website	First	Persistent	Performance	1 Year

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy

settings.

## **12. Contacting Us and Complaints**

To contact us regarding your data, please email [dataprotection@schoolgrid.co.uk](mailto:dataprotection@schoolgrid.co.uk). Individuals are now required to submit data protection complaints to organisations directly in the first instance. If We are unable to resolve your complaint, you have the right to escalate it to the Information Commissioner's Office (ICO).

## **13. Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.