

CHANGELOG

Date	Reason	Location
07/10/2026	Clarified the role of the teacher in the optional AI marking process.	Page 5
21/01/2025	Adding A JONES PRODUCTIONS LTD as a marketing partner and detailing what information they will have access to.	Marketing – Page 8

PRIVACY NOTICE

Your privacy matters to us

We are CraignDave Ltd, a leading UK provider of e-learning resources aimed at secondary school aged children and their teachers. We also produce specialist computer science conferences to support teachers to achieve the very best learning outcomes.

CraignDave Ltd is a private limited company registered in England & Wales (10442992). Our registered address is 12 Tweenbrook Avenue, Gloucester, Gloucestershire, GL1 5JY and we are registered with the UK Information Commissioner under registration number ZA462469

Our products and services include:

- Smart Revise, a web-based application incorporating thousands of exam-style questions that can be used by teachers and pupils to test understanding and identify gaps in knowledge.
- Time2Code, a web-based gamification platform that can be used by pupils to practice coding and embed knowledge.
- CraignDave and Friends conference, a specialist conference event for secondary school computer science teachers .
- A CraignDave shop selling branded merchandise.
- A suite of YouTube videos.
- Premium, downloadable classroom resources to support teachers in lesson delivery.

We are the data controller for the personal data we process about customers of our online shop, conference attendees and participants, parents and students who subscribe to our products directly, job applicants, employees, contractors, and visitors to our website.

We sometimes process personal data as a 'data processor', for example when we handle personal data on behalf of schools or independent tutors who use our products as part of their lesson or homework assignments. In these cases, we process this information upon the school or tutors' written instructions under a contract (a Data Processing Agreement). Where this is the case, we only use the personal data provided to us to provide the agreed services. Our Data Processing Agreement is incorporated into our Terms and Conditions and can be found here: <https://craigndaveltd.zohodesk.eu/portal/en/kb/articles/terms-and-conditions-centre>

Information about our Data Protection Compliance can be found here:

<https://craigndaveltd.zohodesk.eu/portal/en/kb/articles/data-protection-centre>

Our privacy promise to you

Transparency

We are committed to protecting and respecting your privacy. We will always tell you what data we're collecting about you and how we use it and will never ask for more information than we need to. We will not share your data with any third parties unless you have consented to this; they are a trusted partner working on our behalf; or the law requires us to, and we will never sell your personal data.

Security

We are committed to following industry best practices to ensure your data is stored safely and securely. We will protect the information we process about you from accidental or unlawful access, disclosure, loss, damage, or destruction.

Control

We will always give you control over the communications you receive from us and you can stop or tell us you no longer wish to receive these at any time by emailing admin@craigndave.co.uk

How we get your information

Most of the personal data we process is provided to us directly by you, for example when you:

- make an enquiry by email, phone or through our website
- sign up to our newsletters, blogs and promotions
- work with us as an employee or contractor
- use one of our services
- attend one of our conferences

We may also collect personal information about you indirectly, for example through:

- using our website (i.e. via cookies)
- public sources (e.g. websites and professional networking sites)
- recruitment agencies
- referees to support your job application (at your request)

How we handle personal data

Pupil and Teacher's data

Smart Revise

Our Smart Revise product is a leading revision tool for GCSE and A-Level pupils and collects personal data relating to pupils and teachers. To access Smart Revise, a user must create an individual account. To do this, we collect the name and email address of all users of the Smart Revise application. Smart Revise is aimed at those completing their level 2 and 3 qualifications. We recognise that most of our users are children aged 14 – 18 years old. We do not expect children under 13 years old to set up an account to use any of our products or services and where we have discovered this is the case we will delete this data as soon as possible.

Name and email address is provided to us directly by the pupil when they sign up themselves or with the support of their parent, teacher, or tutor. The creation of individual accounts allows pupils to revisit their record of progress and identify their own gaps in knowledge and is a core functionality of our service. We keep name and email address assigned to individual accounts for up to 5 years after the last log-in to the account.

Teachers/tutors can join Smart Revise with a username and password and set up a class group. Each class group is assigned a unique code. Pupils must create their own account and use the class group code linked to their teacher's account to join a class. Teachers are then able to assign work and review their pupils' responses to questions.

Where a pupil has been asked to create an account as part of an assignment set by their teacher, we expect to be provided with their school email address as opposed to their personal email address. Smart Revise also supports the use of single sign-on via Microsoft 365 or Google. Where schools choose to use single sign-on we only receive the information necessary to facilitate single sign-on and do not share personal data with Microsoft or Google.

When a pupil joins a class, the teacher can see the questions that the pupil has attempted, how many times they have answered them and the frequency with when they have answered correctly. Smart Revise uses colour-codes to allow teachers to quickly identify questions or topics that students are failing to answer correctly.

Teachers can take advantage of using dashboards to quickly view pupil responses and identify areas of weakness, allowing them to focus future lessons on topics that their class have not yet mastered. It is at the discretion of the teacher how much or how little they use this functionality.

Smart Revise also allows teachers to use our 'Flight Path' chart which tracks pupil's development of knowledge through repeated use of Smart Revise. The flight path chart gives a visual prediction of the level of knowledge a pupil can be expected to achieve through repeated use and is based upon anonymous aggregate data of how previous Smart Revise users have progressed.

To deliver a more efficient and productive service, Smart Revise also offers teachers the opportunity to allow pupils to mark each other's answers or for artificial intelligence ('AI') to complete the marking. It is at the discretion of the teacher as to whether they use this functionality.

Optional AI marking is completed through use of Open AI's large language model. CraignDave Ltd does not share any personal data with Open AI. Instead, answers to the questions within Smart Revise are anonymously shared and reviewed by the AI model. The AI then generates a score for the question. Prior to returning the marked answers to the pupil, the teacher can choose to review the AI work to ensure accuracy and fairness.

Where peer marking is enabled by the teacher, this functionality anonymously assigns answers to mark to pupils within the same class group. This exercise assists pupils in understanding the marking criteria for the exams they themselves will be undertaking.

Personal data relating to an individual pupil's answers to questions, marking feedback and progress data within a class group is kept for up to 12 months after the exam date for the course that the class content relates to.

Sign-up to Smart Revise is free. To benefit from all available content and functionality, users are required to purchase 'vouchers' which can then be used in make in-app purchases for additional content. All payments are processed via our third-party payment solution provider, Stripe. Where a teacher or tutor uses Smart Revise, they will gift vouchers to the accounts held by their pupils for their pupils to benefit from the full service. To purchase vouchers, users are required to provide name, billing address, email address and phone number. Vouchers can be gifted to other accounts within the Smart Revise app. Personal data collected for this purpose is held for 8 years after the voucher purchase date.

We collect the first name and educational establishment of users of our services that have chosen to provide us with a testimonial. With consent of the person who has given the testimonial, we publish these on our website and will keep them for the duration that our website is active.

Resource Centre

We offer teachers the opportunity to access Resource Centre content for use in the classroom. The only personal data we collect for teachers to access this is a name, work address, work email address, work phone number and the educational establishment they represent. We collect this personal data to fulfil the delivery of the materials and for our legitimate business interests to understand our customers. We keep this personal data for up to 8 years after the last purchase.

Time2Code

The only data collected relating to pupils and teachers who access our Time2Code website is anonymous data regarding their use of the site, which is collected via cookies. Time2Code does not require a log-in or the collection of any identifiable personal data for the visitor to access it.

Festival of Computing Attendees

We collect the name and contact details of all conference attendees and speakers to deliver the conference.

Attendees are required to provide a deposit to secure their place. This is in our legitimate business interests to prevent no-shows and loss of income. All payments are processed via our third-party payment solution provider, Stripe – [Privacy Policy \(stripe.com\)](https://stripe.com/privacy-policy)

Our conferences are often held at event venues that use CCTV. We are not the data controller of the CCTV and strongly advise you to read the relevant privacy notice of the event venue hosting the conference that you plan to attend. Upcoming conference event venues can be found here: <https://craigndave.org/conference>

We keep personal data relating to our conference attendees for 12 months after the date of the conference.

Analysis of Service- Use

We use anonymous, aggregate data of users of our Smart Revise service to understand how the product is used and can be improved. Understanding which elements of Smart Revise are contributing to better learning outcomes, also allows us to enhance these features and provide a greater overall learning experience.

Service enquirers

When someone contacts us asking about our services through our website, by email or over the telephone, we collect their name, contact details and the nature of their enquiry. We collect this information for our 'legitimate interests' as a company to be able to respond to their enquiry and keep a record of our communications with them. If they choose to become a customer, we will keep their personal data in line the relevant customer retention periods given under each section of this privacy notice. If they do not become a customer, we keep this information for 5 years from the date of the last communication.

Newsletter Subscribers

We collect the name and contact details of people who want to subscribe to our newsletters. We collect this information with the 'consent' of the individual when they opt-in to receive these communications. If a person unsubscribes, we remove them from our mailing list but retain their contact details. We need to retain this information for our 'legitimate interests' to ensure we do not contact them again in the future. We keep subscriber data until they unsubscribe, if the email address becomes invalid or if we believe they no longer want to receive communications from us.

Customer leads

We sometimes collect the name, job role and work contact details of employees working for potential customers, who we think would be interested in receiving information about our company's services; this is known as 'B2B' or 'business to business' marketing. This information is only collected from public sources, such as company websites or where the employee has published their name, work profile and contact details on a networking site for professionals, (such as LinkedIn) and therefore would have a reasonable expectation that companies like us, may contact them to make introductions and market their services.

We collect this information to pursue our 'legitimate interests' to be able to promote and market our services to potential new customers. Recipients can opt-out from receiving communications from us at any time, by emailing admin@craigndave.co.uk

We keep this information for 6 months from the date of our last communication, where the communication does not lead to a sale. If the communication does lead to a sale, this information will be retained in line with the above retention periods for teachers.

Website users

When you visit our website, Cookies are used to help you navigate around our site and tell us how well our website is performing. If you have arrived on our site by clicking on an advertisement via Google or Meta, we collect this information to monitor the success of our marketing strategy.

We do not make any attempt to find out the identities of those visiting this website and will not associate any data gathered with any personally identifying information from any source. We collect this information for our 'legitimate interests' to help you use our website and keep us informed about our website's performance.

Job applicants

We receive Curriculum Vitae (CVs) and application forms from people who apply for jobs with us. This will often include the individual's name, contact details, experience, education, and a personal statement to support their application. We collect this information with the person's 'consent', and ongoing processing for our 'legitimate interests' to be able to assess the suitability of the individual and where relevant, invite them to interview.

Applicants who are not successful, prior to or after interview, their CV and application will be destroyed after 12 months, unless the applicant gives us their permission to retain this information for longer. Information relating to successful applicants, will be retained on their employee file, and held for the duration of their employment, plus a further 7 years after their contract has ended.

Employees

We collect information about our employees, such as their name, date of birth, contact details, recruitment information, evidence of their right to work, outcome of their criminal record check (DBS) (where required), references, contract, bank details and other employment information. We collect this information to enable us to 'fulfil our contract' with the employee or to 'take steps at the request of the employee prior to entering into a contract' with them. For example, to ensure they are paid; make pension and tax contributions on their behalf and provide employee services and benefits to them. We also collect this information to pursue our 'legitimate interests', for example to recruit employees, maintain a register of our employees (past and present) for insurance, legal, tax and pension purposes and to assist in the prevention or detection of crime (including fraud).

We sometimes collect 'special category data' about our employees, for example information about their disabilities, health and dietary needs or religious beliefs. We process this information to fulfil our contract with the employee (or in order to take steps at the request of the data subject prior to entering into a contract with them) and to carry out our obligations or exercise our or our employees' rights in relation to

employment, social security or social protection. We keep employee files for 7 years after the contract has ended.

Who we share information with

We do not share your personal data with other organisations, unless it is necessary for our 'legitimate interests', legal, contractual, regulatory or law enforcement purposes. Where we use 'data processors' to help us manage and store our data (cloud storage providers); promote our services (advertising/marketing companies) or help us deliver our services (contractors or specialist companies), we have Data Processing Agreements in place, to protect any personal data they may have access to on our behalf.

Our data processors only act on our instructions and are carefully selected to ensure they have robust security measures in place and comply with data protection legislation when processing personal data.

Where we process your personal data as a data 'processor' for our customers, your personal data may be accessible to or shared with that customer, to enable us to 'fulfil our contract' with them.

There may be times when we need to disclose personal data to other data controllers, for example:

- In the event that we sell our company or its assets
- If you provide us with your consent
- If we are under a duty to disclose your personal data, for example in response to a court order, request from law enforcement agencies or to report safeguarding concerns.
- To enforce or apply our terms and conditions and other agreements.
- To protect the rights, property, or safety of our company and its employees, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Marketing

We also share limited and specific information with our marketing company, A JONES PRODUCTIONS LTD, who, upon our instruction, create our newsletters, video content and other types of media.

This role includes the access of the following information:

- Email address if signed up to our newsletter
- Name

A JONES PRODUCTIONS LTD access this data via a Zoho account, wholly controlled by CRAIGNDAVE LTD, and can be deactivated at any time.

Specific data (your email address) is uploaded to Zoho via our CRM and exported to Zoho Campaigns for the purpose of creating our newsletter.

Where your email data is stored in Smart Revise, and you have opted into our marketing, the data is exported from Smart Revise and uploaded to Zoho Campaigns directly.

A JONES PRODUCTIONS LTD will not have access to student email addresses.

Where we store your data

We use secure platforms to store our data and our customers' data. The data location and security measures of each of our storage providers are below.

Data Storage Location	Security Measures
Zoho - Ireland	Zoho's Security Measures
IONOS – United Kingdom	IONOS's Security Measures
Penn Studios – United Kingdom	Penn Studio's Privacy Policy
Microsoft Azure – Ireland	Microsoft Azure's Security Measures
Stripe – United Kingdom	Stripe's Security Measures
Intuit QuickBooks – United Kingdom	Intuit's Security Measures

We have Data Processing Addendums with our storage providers to ensure personal data is handled in accordance with UK and EU data protection laws. The Addendums are available for inspection as follows:

[Zoho Data Processing Addendum](#)

[Microsoft Azure Data Processing Addendum](#)

[IONOS Data Processing Addendum](#)

[Stripe Data Processing Addendum](#)

[Intuit Data Processing Addendum](#)

How we protect your data

We take our security responsibilities very seriously and have put in place robust measures to protect our data and our customers' personal data from accidental or unlawful access, disclosure, loss, damage, or destruction.

Here are some examples of how we achieve this:

- Data is held on encrypted servers.
- Personal data is encrypted in transit and at rest
- Access to our data and systems is on a strict need to know basis and we ensure our employees and contractors are under an obligation of confidentiality.
- Employees receive mandatory data protection training and sign up to our Data Protection Policy.
- We have robust procedures in place to manage and report personal data security breaches, in the unlikely event of a breach occurring.

- Where we use companies who process personal data on our behalf, we carry out due diligence checks on these companies and have written contracts in place which require them to handle personal data in line with data protection laws.
- We use up to date virus and malware protection software and we back up data regularly.

Your data protection rights

You have the following rights under the UK data protection laws:

Right to know

You have the right to be told how your personal data is being processed. This privacy notice tells you how we handle your personal data.

Right of access

You have the right to ask us for a copy of your personal data.

Right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Right to erasure

You have the right to ask us to erase your personal data in certain circumstances.

Right to restriction of processing

You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Right to object to processing

You can object and ask us to stop using your personal data for direct marketing purposes.

Right to data portability

You have the right to ask that your personal data is transferred (ported) from us to another organisation or given to you. This applies to information you have given to us where we are processing your information based on your consent or for contractual purposes and the processing is automated.

Right to complain

We work to high standards when it comes to processing your personal data. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office via their website at www.ico.org.uk/make-a-complaint

To exercise your data protection rights please contact us by emailing: admin@craigndave.co.uk



You are not usually required to pay a fee and can expect to receive a response within one calendar month. Further information about your data protection rights can be found on the Information Commissioner's Office website at www.ico.org.uk

International Customers

Our educational products and services are popular across the globe. If you are accessing our services outside the United Kingdom (UK), your country may have its own data protection laws. The UK data protection laws provide exceptional rights, control and protection for personal data. This privacy notice explains how we look after your data and the rights you have under the UK data protection laws, however if you have any queries about how we can meet your country's data protection laws, please get in touch by emailing us at: admin@craigndave.co.uk

Contact us

If you have any queries about this privacy notice or the services we offer, please email our Data Protection Lead at dave@craigndave.co.uk or write to us at FAO Data Protection Lead, 12 Tweenbrook Avenue, Gloucester, Gloucestershire, GL1 5JY.

Changes to this privacy notice

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated on **21st January 2025**.