Privacy Notice

How we collect, use and protect personal information

Collaborative Computing Education Ltd

Document control

Item	Detail
Data controller	Collaborative Computing Education Ltd
Company number	17125886
Registered address	12 Queens Square, Chippenham, Wiltshire, SN15 3BL
Person responsible for data protection	Jake Miles, Director and Designated Safeguarding Lead
Contact	jake@collaborativecomputing.co.uk
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1. The short version

If you only read one page, read this one.

- We collect the information we need to teach your child safely and well, to run the business, and to keep children safe. Nothing more.
- We do not sell your information, we do not share it with advertisers, and we do not use children's information for marketing.
- We do not record lessons and we do not photograph or film children. The only images we take are in-game screenshots of what children build.
- We share information with other people only when we have to: with your child's school where you have asked us to, with our accountant for invoices, and with children's social care or the police where a child may be at risk of harm.
- If a child is at risk, we will share information without asking first. That is the one situation where we will not wait for your permission.
- You can ask us at any time what we hold about you or your child, ask us to correct it, or ask us to delete it. Section 12 explains how.
- If you are unhappy with how we have handled your information, you can complain to us and then to the Information Commissioner's Office. Section 15 explains how.

The rest of this notice sets out the detail, because the law requires us to be specific.

2. Who we are and who this notice is for

Collaborative Computing Education Ltd provides specialist computing education for children. We deliver live online Minecraft Education lessons to children at home, and we teach computing in primary schools across Wiltshire and the South West.

We are the data controller for the personal information described in this notice. That means we decide what information is collected and what happens to it, and we are legally responsible for it.

Jake Miles is the Director and is personally responsible for data protection and for safeguarding. We are small enough that this is one person rather than a department, and you can reach him directly at jake@collaborativecomputing.co.uk.

This notice covers four groups of people:

Who	Which sections apply
Parents and carers who book online lessons	Sections 3, 4, 5, 6 and 8 to 16
Children who take part in our online lessons	Sections 4, 5, 6, 11 and 12

Who	Which sections apply
Children we teach in schools	Section 7
Staff at schools, and people who contact us through the website	Sections 6, 8 and 9

2.1 A note about children we teach in schools

When we teach in a school, the school is normally the data controller for information about its pupils, and we act on the school's instructions. The school's own privacy notice will explain how it uses pupil information. Section 7 sets out what we do with pupil information in that situation, but if you are a parent at a school we work with, your first point of contact is the school.

3. What we collect from parents and carers

What we collect	Why we need it	Our lawful basis
Your name, email address, telephone number and home address	To arrange lessons, contact you, and know where your child is during an online session in case of an emergency	Performance of a contract with you
At least two emergency contact numbers	So that we can reach a responsible adult quickly if something goes wrong during a session	Performance of a contract, and protecting someone's vital interests in an emergency
Payment and invoicing details, including bank transfer references	To take payment and keep proper business records	Performance of a contract, and legal obligation for tax and accounting records
Records of your bookings, cancellations and correspondence with us	To run the service and resolve any query or complaint	Performance of a contract, and our legitimate interest in keeping accurate business records
Your consent decisions, including consent for one to one teaching and for the use of in-game screenshots	To evidence that you agreed to how we teach and how we use images	Legal obligation to demonstrate consent, and our legitimate interest in keeping a clear record

4. What we collect about children in our online lessons

What we collect	Why we need it	Our lawful basis
Your child's name, date of birth, year group and school	To pitch teaching at the right level, group children appropriately, and link lessons to what they are doing at school	Performance of our contract with you as the parent
The Microsoft account name and in-game display name your child uses in Minecraft Education	To admit your child to the private world, check who is in the session against the register, and moderate the session	Performance of a contract, and our legitimate interest in keeping sessions secure
A register of attendance, showing which sessions your child joined and for how long	To manage bookings, and to know exactly who was present if a concern is raised about a session	Performance of a contract, and our legitimate interest in safeguarding
Notes on your child's progress, what they made, and what to work on next	To teach well and to give you the written note after every session	Performance of a contract
In-game screenshots of your child's builds and code	To evidence progress and to show you what your child has made. These show the world, not the child	Performance of a contract. Separate consent is required if we ever want to publish one
Health, medical, allergy or SEND information you tell us about	To teach your child safely and make reasonable adjustments	Explicit consent, which you give on the registration form and can withdraw at any time

4.1 What we do not collect

- We do not record lessons, video calls or voice.
- We do not photograph or film children, and we do not screenshot the video call.
- We do not collect your child's personal social media accounts, gamertags for other games, or contact details, and we ask children not to share these in sessions.
- We do not use behavioural tracking, profiling or automated decision making about children.
- We do not use children's information for marketing.

5. Safeguarding information

This is the most sensitive information we hold, and it works differently from everything else in this notice, so it has its own section.

5.1 What we record

If we have a concern that a child may be at risk of harm, we write it down. That record may include what a child said in their own words, what we saw or heard, who we spoke to, what we decided, and why. It can include information about a child's health, family circumstances, or alleged criminal conduct by another person.

5.2 Our lawful basis

Safeguarding records usually contain special category data, and sometimes criminal offence data. Our lawful basis is:

- **Article 6(1)(f) UK GDPR, legitimate interests**, being the protection of children from harm. Where we are acting on a specific legal duty, such as the duty to refer a person to the Disclosure and Barring Service, our basis is Article 6(1)(c), legal obligation. In an emergency our basis may be Article 6(1)(d), vital interests.
- **Article 9(2)(g) UK GDPR, substantial public interest**, relying on the condition at paragraph 18 of Part 2 of Schedule 1 to the Data Protection Act 2018, "safeguarding of children and of individuals at risk". That condition applies where processing is necessary to protect a person under 18 from neglect or physical, mental or emotional harm, or to protect their wellbeing, and consent cannot reasonably be sought or would prejudice that protection.

Because we rely on that condition, the law requires us to keep an appropriate policy document explaining how we comply. It is at Appendix A of this notice.

5.3 What this means in practice

We will not always ask your permission before sharing safeguarding information, and we will not always tell you that we have shared it. We would normally tell you, and we prefer to. But we will not do so if telling you would put a child at greater risk, interfere with a police investigation, or where you are the subject of the concern.

We do not promise confidentiality to a child, and we say so to children before they tell us anything.

Data protection law does not prevent the sharing of information in order to protect a child. Where we are unsure whether to share, we share, and we record why.

5.4 Who we share safeguarding information with

- The designated safeguarding lead at the school, where the concern arises in a school

- Children's social care in the local authority where the child lives, which for Wiltshire is the Multi-Agency Safeguarding Hub
- The Local Authority Designated Officer, where a concern is about an adult who works with children
- The police
- The Disclosure and Barring Service, where we have a legal duty to make a referral

We share the minimum necessary, and only with the people who need it.

6. What we collect from schools and from enquiries

What we collect	Why we need it	Our lawful basis
Names, job titles, work email addresses and telephone numbers of school staff	To arrange and deliver our services to the school	Performance of a contract with the school, or our legitimate interest in managing a business relationship
Enquiries submitted through the contact form on our website, including the name, email address and message you send us	To reply to you	Our legitimate interest in responding to people who contact us
Correspondence, quotes, contracts and invoices	To run the business and keep proper records	Performance of a contract, and legal obligation for tax records

7. Pupil information in schools

When we teach in a school, the school remains the data controller for its pupils' information and we act as its processor, on its instructions and under its policies.

- We see pupil names, year groups, and whatever the class teacher tells us about a child's needs in order for us to teach them.
- We may keep brief assessment or progress notes to feed back to the class teacher.
- We do not take pupil information off site unless the school has asked us to and it is necessary. Where we do, it is stored securely and deleted once it is no longer needed.
- Any safeguarding concern goes to the school's designated safeguarding lead, recorded on the school's system. We keep only a short note that a concern was raised, when, and to whom.
- We follow the school's photography and consent arrangements, not our own.

If you are a parent at a school we work with and you want to know how pupil information is used, please ask the school in the first instance.

8. Who we share information with

We do not sell personal information, and we do not share it with advertisers.

8.1 Suppliers who process information on our behalf

These organisations handle information for us under a contract. They can only use it to provide their service to us.

Supplier	What they handle	Where
Microsoft	Email, file storage, Microsoft Teams for the live video calls, and Minecraft Education accounts and worlds, all through Microsoft 365	UK, EU and United States
Base44, the platform our website is built on	Website hosting, and the contact form submissions stored in our website database	United States
Intuit, which provides QuickBooks	Invoices, payments and accounting records	United Kingdom and United States
Our bank	Payments received by bank transfer	UK

8.2 Other people we may share with

- Your child's school, where you have asked us to share progress information, or where a safeguarding concern arises
- Children's social care, the Local Authority Designated Officer, the police and the Disclosure and Barring Service, in the circumstances described in section 5
- Emergency services, if there is an immediate risk to someone's life or safety
- Our insurers and, if ever needed, our legal advisers, in connection with a claim
- HM Revenue and Customs and Companies House, where the law requires it

8.3 Information leaving the UK

Some of our suppliers store or process information outside the UK.

Microsoft. Email, file storage, Microsoft Teams and Minecraft Education operate across Microsoft's UK, EU and United States infrastructure.

Our website. Our website is built on Base44, and enquiries you send through the contact form are stored in a database hosted in the United States. That means the name, email address and message you send us leave the UK.

Accounting. We use QuickBooks, provided by Intuit, to keep invoices and financial records. Intuit is a United States company and information may be processed there.

Where personal information is transferred outside the UK, it must be protected by one of the safeguards UK data protection law recognises, such as the UK Extension to the EU-US Data Privacy Framework or the International Data Transfer Agreement. If you would like to know which safeguard applies to a particular supplier, ask us and we will tell you.

If you would rather not use the contact form for this reason, email us directly at info@collaborativecomputing.co.uk instead.

9. Where the information comes from

Almost all of it comes directly from you, on the registration and consent form, in emails, or in conversation.

We may also receive information:

- from your child, during a lesson, including anything they choose to tell us
- from a school, where the school has engaged us
- from children's social care, the police or another agency, in connection with a safeguarding concern

10. How long we keep information

Information	How long we keep it
Enquiries that do not lead to a booking	12 months from the last contact, then deleted
Registration and consent forms, contact details, emergency contacts	For as long as your child attends, then 12 months after the last session, then securely deleted
Attendance registers and session notes	3 years after the last session

Information	How long we keep it
In-game screenshots of children's work	Deleted at the end of the block of lessons, unless you have asked us to keep them or given consent for us to publish one
Safeguarding records	Until the child's 25th birthday, then reviewed and securely destroyed. See Appendix A
Invoices, payments and accounting records	6 years from the end of the financial year they relate to, as required for tax purposes
Website contact form submissions	12 months, then deleted

We review what we hold at least once a year and delete anything we no longer need.

11. How we treat children's information

Children have the same data protection rights as adults, and we take that seriously even though the children we teach are young.

- We explain to children, in language they understand, that we keep notes about their learning and that we would tell a grown up if we were worried about them.
- We tell children before they tell us anything that we cannot promise to keep a safeguarding concern secret.
- We collect the minimum we need, and we ask children not to share personal information in chat or in the game.
- For primary aged children we normally deal with the parent or carer when someone asks to see or change information, because that is usually in the child's interests. A child can make a request themselves, and we will consider whether they understand what they are asking for. If they do, we will deal with them directly.
- We do not profile children, target them with marketing, or use their information to make automated decisions about them.

12. Your rights

Under UK data protection law you have the right to:

- **be told** how we use your information, which is what this notice is for
- **ask for a copy** of the information we hold about you or your child, known as a subject access request
- **have it corrected** if it is wrong or incomplete
- **have it deleted**, where we no longer have a good reason to keep it

- **restrict how we use it** while a query is being sorted out
- **object** to us using it where our basis is legitimate interests
- **receive it in a portable format**, where our basis is consent or contract and the processing is automated
- **withdraw consent** at any time, where consent is our basis, for example consent to publish an in-game screenshot

To exercise any of these rights, email jake@collaborativecomputing.co.uk. We will respond within one month. There is no charge. We may ask you to confirm your identity first, so that we do not disclose a child's information to the wrong person.

12.1 Where these rights are limited

Some rights do not apply to safeguarding records. In particular, we may withhold information if disclosing it would be likely to cause serious harm to a child or to another person, or would prejudice a police or social care investigation. Where we withhold something, we will tell you that we have done so unless telling you would itself cause that harm, and we will explain your right to complain to the ICO.

13. Keeping information safe

- Information is held on a password protected, encrypted device that is kept up to date, with a firewall and anti-virus software in use.
- Safeguarding records are stored separately from ordinary business records, with access restricted to Jake Miles.
- We do not store children's personal information on a shared or family device, and we do not leave devices logged in and unattended.
- Paper forms, where used, are kept locked away and destroyed securely.
- We use business accounts for all communication, never personal ones.
- If there were ever a personal data breach that posed a risk to anyone, we would report it to the ICO within 72 hours and tell the people affected where the risk to them was high.

14. The website, cookies and marketing

14.1 The website

Our website is at www.collaborativecomputing.co.uk. It is built on Base44.

The contact form. When you use it, we receive your name, email address and the message you send. Section 8 explains where that is stored and how long we keep it.

We do not use cookies. Our website sets no cookies at all. It does not use Google Analytics, advertising tags, social media trackers, or any other third-party tracking service.

What is stored in your browser. The site does store a small amount of information in your browser's local storage:

- an identifier for the website and the version it is running, which the site needs in order to load and work properly
- a session identifier, used to count visits and see which pages people use

Visitor statistics. The session identifier lets us see how many people visit, which pages they look at and how they got here, so that we can improve the site. This is collected by Base44 on our behalf and used only to improve this website. We do not use it to identify you, to build a profile about you, to target advertising, or to follow you across other websites.

If you would rather we did not collect visit statistics from you, email info@collaborativecomputing.co.uk and we will stop. You can also clear this information at any time through your browser settings.

14.2 Marketing

We will only send you marketing about our services if you have asked us to, or if you are an existing customer and we are telling you about something similar to what you already have. Every marketing email has an unsubscribe link, and you can also just reply and ask us to stop. We never send marketing to children.

15. How to complain

If you are unhappy with how we have used your information, please tell us first. Email jake@collaborativecomputing.co.uk and we will look into it and reply.

If you are not satisfied with our response, you can complain to the Information Commissioner's Office, which is the UK's independent regulator for data protection.

- **Website:** ico.org.uk/make-a-complaint
- **Helpline:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You do not need our permission to complain to the ICO, and you do not have to come to us first.

If your concern is about a child's safety rather than about data, please use the contacts in our Safeguarding and Child Protection Policy instead.

16. Changes to this notice

We review this notice at least once a year, and whenever we change how we work, add a new service, or start using a new supplier. The current version is always on our website, and the version number and date are in the document control table at the front.

Appendix A: Appropriate policy document

This appendix is required by section 10 of, and Schedule 1 to, the Data Protection Act 2018 where a controller relies on a substantial public interest condition in Part 2 of Schedule 1. We rely on the condition at paragraph 18, safeguarding of children and of individuals at risk. This document explains how we comply.

A1. What we process and why

We process special category data, and occasionally criminal offence data, in order to protect children from neglect or physical, mental or emotional harm, and to protect their physical, mental or emotional wellbeing.

This can include health and medical information, information about a child's family circumstances, information relating to a child's or an adult's alleged criminal conduct, and information a child tells us about what has happened to them.

A2. Our conditions for processing

Requirement	Our position
Article 6 lawful basis	Legitimate interests, being the protection of children from harm. Legal obligation where a statutory duty applies, such as a referral to the Disclosure and Barring Service. Vital interests where there is an immediate risk to life or safety.
Article 9 condition	Article 9(2)(g), substantial public interest.
Schedule 1 condition	Part 2, paragraph 18, safeguarding of children and of individuals at risk.
Criminal offence data	The same Schedule 1 condition, which sits in Part 2 and is available for criminal offence data under section 10(5) of the Act.

A3. Compliance with the data protection principles

Lawfulness, fairness and transparency. We publish this privacy notice and give it to every parent before their child starts. We tell children that we cannot promise to keep a safeguarding concern secret. Where paragraph 18 applies we may process without consent, and section 5.3 of the notice explains when we would not tell a parent.

Purpose limitation. Safeguarding records are used only for safeguarding. They are not used for teaching, marketing, business analysis or any other purpose.

Data minimisation. We record what is necessary to describe the concern, the action taken and the reason for it. We record facts and the child's own words, not speculation.

Accuracy. Records are written on the same day, dated, timed and signed. Where we record an opinion we say that it is an opinion. If a record is later shown to be wrong, we correct it and keep a note of the correction rather than deleting the original.

Storage limitation. Safeguarding concern records are retained until the child's 25th birthday and then reviewed and destroyed securely. This follows the retention period used by schools under the Information and Records Management Society toolkit, which is referenced in the Department for Education's data protection guidance for schools. The retention period is reviewed annually.

Integrity and confidentiality. Records are stored separately from ordinary business records, encrypted and password protected, with access restricted to Jake Miles as Designated Safeguarding Lead. They are never held on a shared or family device.

Accountability. Jake Miles is responsible for data protection and for safeguarding, completes safeguarding and data protection training, and reviews this document and the privacy notice at least annually.

A4. Retention and erasure

Record	Retention	Erasure
Safeguarding concern records and referrals	Until the child's 25th birthday, then reviewed	Secure deletion of digital records and secure destruction of any paper
Records of allegations about an adult	Until the person reaches normal pension age, or 10 years from the date of the allegation, whichever is longer	Secure deletion and destruction
Low-level concern records	For as long as the person works with children for us, then 6 years	Secure deletion and destruction

A5. Review

Item	Detail
Document owner	Jacob Miles
Date this document takes effect	1 September 2026
Review date	1 September 2027

We will keep this document under review, retain it for as long as we rely on the paragraph 18 condition and for six months afterwards, and make it available to the Information Commissioner on request.

Collaborative Computing Education Ltd. info@collaborativecomputing.co.uk. www.collaborativecomputing.co.uk.