



CalmBrain Privacy and Data Policy for Schools

Being an online organisation and with digital technology at the heart of everything we do, online safety for our customers and all users is paramount in its importance to us. CalmBrain complies with the General Data Protection Regulation.

In-Product Data Collection and Use

CalmBrain provides a personalised experience for its groups and users. Account information for CalmBrain users including CalmBrain co-ordinators (administration role), teachers, children and caregivers are password-protected so that only the user, account administrators and teachers / caregivers have access to this personal information. By requiring users to log in, individuals with access to use CalmBrain can access the relevant content and their progress can be monitored.

We insist that you do not disclose your password to anyone to keep your data secure. CalmBrain will never ask you for your password when contacting you by phone or email. CalmBrain automatically logs users out after 30 minutes of inactivity if they are logged in as an individual user. When you have finished using CalmBrain, we recommend that you log out. This is to ensure that others cannot access your account information if you share a computer with someone else or are using a computer in a public place such as a library.

CalmBrain collects the following data and stores it securely:

Teachers / CalmBrain Co-ordinators / Caregivers

CalmBrain enables teachers, Co-ordinators and administrators to create and set up their own account. This allows these roles to upload and manage their own groups / classes, complete

assessments for them and monitor progress with added security. We ask these user groups for their first name, last name, email address, username and password.

At all times, within the definition of the General Data Protection Regulation (GDPR), the school and its employees retain the status of Data Controller for the data stored on our cloud service. The data obtained from the school's systems always remains in the ownership of the school, or that of the individual (employed or caregiver) users. CalmBrain is the Data Processor for the purposes of the GDPR.

When creating a new individual account we require a first name, last name, and completion of assessment questions where the answers are stored. It is strongly recommended that this information is securely provided directly via your web portal.

We do not encourage any customer to email attachments containing personal data, and especially data about children, to CalmBrain, but if you do so, it is the responsibility of the individual concerned to follow their organisation's internal data protection protocol and ensure either whole email encryption or robust protection of any attachments.

Optional fields will also be made available to record useful and relevant data against a user for whom an individual account exists. Any movement played that is part of an individual programme or group programme is saved and stored against the group or individual profile as part of their history and can be reported on.

Marketing Data Collection and Use

On our website, we request personal information in the following areas:

Mailing List – Your email address in order to send you relevant news and important operational information.

Support – Your title, first name, last name, email address, and school name. We use this information to link your question to your school account so that we can contact you with a relevant and timely response.

When providing us with your information, you will also be given the option to opt in to a number of different communications from us, which fall into the following categories: product updates, events and training. However, your chosen action is not dependent on opting in to these communications.

Updating Your Information

You can update your account information by emailing the team at: calmbrainsupport@calmbrainapproach.com. This is available to the account co-ordinator, head teacher or caregiver only. The CalmBrain co-ordinator role has control of all users in a school setting; in a home / social care / healthcare setting this will be the lead individual (i.e. parent, foster carer, psychologist, for example) and can add/change/delete on request.

Data kept for marketing purposes can be changed at any time by clicking on the unsubscribe link on any email from us. From this link, you will be able to access the marketing preferences linked to your email address, meaning you can limit contact to free resources, product updates, events and training, free trials and/or special offers, or deselect yourself from all non-account based emails entirely. Alternatively, you can email calmbrainsupport@calmbrainapproach.com to update your information.

How long does CalmBrain keep data?

Why We Delete Data

CalmBrain stores data for its users. To ensure that CalmBrain does not hold user information in perpetuity, it has set criteria for the deletion of unused data.

Product Data

- **Users** CalmBrain holds data for Teacher, and Admin user accounts in a school setting; for care givers / medical professionals and the child / patient users in other settings. If these accounts are left inactive for two years they will be inactivated. The definition of inactive is if the user has not logged in (via any route) for two years.
- **Assessment Tracker** Any saved assessment data will be held for as long as is required.
- **Usage Statistics** Usage statistics of CalmBrain at school level will be stored in CalmBrain's management system and will be kept in perpetuity. No personal/user level information can be extracted from this data.

Sharing Data

CalmBrain has a strict policy of not sharing any information about users of the system with anyone outside the organisation at an individual level. CalmBrain will not share individual data with third parties unless explicit instruction is given by the school in question, and we will never sell user information or data collected from our website. There may be occasions where fully anonymised, aggregated data might be used in summary form for research or educative purposes.

Data Processors

CalmBrain uses data processors to facilitate communications and support of your subscription. We remain the data controller of your data and these processors only process your data in accordance with our strict instructions. We periodically audit our data processors to ensure they comply with the GDPR and our contract.

Security and Protection of Your Information

All remote access to the CalmBrain web application is conducted over HTTPS, an encrypted web link secured using Secure Sockets Layer (SSL). This is the same method used by banks and commercial entities to secure sensitive data from interception.

External Data Storage

CalmBrain stores data on secure database servers held within the Microsoft Azure cloud services ecosystem. Microsoft are an internationally recognised and leading provider of cloud services. They are trusted and used by many of the leading UK and Global organisations. Physical access to Microsoft servers is strictly controlled and limited to authorised personnel in order to maintain their servers.

Transfer of Data Outside of the European Economic Area

All data entered and saved on the CalmBrain product is stored and backed up on secure database servers owned by Microsoft. Any email communication with us will go through our email system (Microsoft Office 365) which is held on Privacy Shield compliant servers. We do not require users to send us any data, and if you do choose to send us data via email we undertake to delete such data once actioned.

Access to Information

The General Data Protection Regulation gives you the right to access information held about you. Your right of access can be exercised in accordance with the regulations.

CalmBrain Employees

To ensure that the user receives the best customer care, CalmBrain's staff have access to user data (dependent upon their role). User access is controlled via permissions managed by the CalmBrain co-ordinator role.

CalmBrain and Cookies

A cookie (also called a HTTP cookie, web cookie or browser cookie) is a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website, which is subsequently sent back to the same website by the browser.

To function, a cookie asks permission to be placed on your computer's hard drive. Once you agree, the file is added and will subsequently recognise you when you return to a particular site and/or help CalmBrain analyse its web traffic.

How CalmBrain Uses Cookies

CalmBrain uses cookies in a limited way to provide you with the best possible experience on our website and to identify critical details such as account and user information on our product.

How to Control and Delete Cookies

CalmBrain relies on cookies to authenticate its users and provide you with the correct content. Should you wish to control the cookies that are set, stop them being used or delete them altogether, you can do, but restricting or preventing any cookies may negatively affect your experience of the site.

All the latest browsers allow you to change your cookie settings. This is usually within the Settings section of the browser menu but accurate information for each browser can be found by clicking on the links below:

- [Cookie settings in Google Chrome](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Mozilla Firefox](#)
- [Cookie settings in Apple Safari](#)
- [Cookie Settings in Microsoft Edge](#)

Contact Us

You may contact us at any time via email (calmbrainsupport@calmbrainapproach.com).