



Privacy Policy

Last updated: January 2026

Waffle Education (“we”, “us”, “our”) provides software-as-a-service tools at waffleeducation.co.uk and related subdomains (the “Service”). This Privacy Policy explains how we collect, use, disclose, and protect personal data when you use our Service, and describes your privacy rights under UK law. We write this in plain English and keep it concise, transparent, and easy to access.

1. Who we are (the data controller)

- **Controller:** Waffle Software Ltd trading as Waffle Education
- **Contact (privacy):** privacy@waffleeducation.co.uk

2. What data we collect and why

We collect and process the following categories of personal data, for the purposes and lawful bases listed below.

Category	Examples	Purpose(s)	Lawful basis
Account data	Name, email, role, school/organisation	Create/manage accounts; provide the Service	Contract (to provide the Service)
Authentication	Passwords, SSO identifiers	Secure login and account integrity	Legitimate interests (security), Contract
Usage data	App interactions, feature use, logs	Operate, troubleshoot, and improve the Service	Legitimate interests (service improvement/quality)
Device/tech data	IP address, browser, OS	Security, fraud prevention, performance	Legitimate interests (security)
Support data	Tickets, chat transcripts	Resolve issues and provide support	Contract / Legitimate interests
Billing	Contact, billing address, transaction info	Invoice and account administration	Contract / Legal obligation (tax)
Communications	Product updates, notices	Send essential service communications	Contract / Legitimate interests

3. Where we get data from

- Directly from you (account sign-up, in-app forms, support requests).
- From your organisation (e.g., a school or trust admin creating user accounts).
- From UK Government databases (e.g. www.get-information-schools.service.gov.uk/).
- From your device and browser as you use the Service (security, logs, performance).

4. Cookies & similar technologies

We use cookies and similar technologies (e.g., local storage) for the following:

- **Strictly necessary** cookies to run the site and keep you logged in.
- **Preference** and **performance** cookies to remember settings and improve the Service.
- **Analytics/measurement** cookies (We do not use cookies to track users and their preferences. We do not use google analytics.)

5. How we share data

We share personal data only with:

- **Processors** who provide our infrastructure and support services (e.g., hosting, email delivery, analytics) under written data processing agreements.
- **Your organisation** (e.g., a school/trust admin viewing usage, managing users).
- **Professional advisers** (legal/accounting) where necessary.
- **Authorities or regulators** where required by law or to protect rights and safety.

6. International data transfers

If we transfer personal data outside the UK, we use one of the following safeguards:

- **Adequacy** regulations (where the recipient country is approved by the UK) - preferred.
- The **International Data Transfer Agreement (IDTA)** or the **UK Addendum** to the EU SCCs, plus a **Transfer Risk Assessment (TRA)**, as required.

7. Data retention

We keep personal data only as long as necessary for the purposes described above, including to meet legal, accounting, or reporting requirements. After the applicable period, we securely delete or anonymise data. This occurs 24 months after account closure.

8. Security

We implement appropriate technical and organisational measures to protect personal data, including encryption in transit, access controls, least-privilege administration, and regular monitoring.

9. Your rights

Under UK data protection law, you have the right to:

- **Be informed** about how your data is used;
- **Access** your data;
- **Rectify** inaccurate data;
- **Erase** your data (in certain cases);
- **Restrict** or **object** to processing;
- **Data portability** (for certain processing);
- **Not be subject to** automated decisions with legal or similarly significant effects without appropriate safeguards.

You can exercise these rights by contacting us at privacy@waffleeducation.co.uk. You also have the right to complain to the **ICO** (see Section 12).

10. Direct marketing

We will only send you **electronic direct marketing** (e.g., email newsletters) with your **consent** or as otherwise permitted by law. You can opt out at any time by clicking “unsubscribe” or changing your preferences.

11. How to contact us or the ICO

- **Contact us:** privacy@waffleeducation.co.uk
- **Information Commissioner’s Office (ICO):**
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 0303 123 1113
ico.org.uk

Individuals may contact the ICO for advice or to make a complaint.

12. Changes to this policy

We will update this Policy from time to time, for example to reflect changes in law (including updates to PECR/cookie guidance under the Data (Use and Access) Act) or our services. We will post the updated version and change the “Last updated” date.