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# Pearson Privacy Notice

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This privacy notice explains how the Pearson family (Pearson Education, Inc, Pearson Education Limited and their group companies use personal data. We have a consistent approach across our business where possible, but personal data collection and processing is sometimes different depending on the products and services that you use (our "Services"). That is why we have included privacy information in the user journeys of our Services (e.g. “just in time notices” at the point of personal data collection) which should be read together with this policy so that you have a clear understanding of how we collect and use your ‘personal data’ and 'personally identifiable information' – which is information that can be used on its own or with other data to identify, contact, or locate a person (for example your name, nickname or an online identifier) (for the purposes of this notice 'personal data').

## 1. Who are we?

We are a multinational provider of education, training and assessment/verification services. We work with students who come to us directly, and with corporations, schools and other academic institutions who may instruct us to process personal data on their behalf. Our Services include:

- **Assessments, Qualifications and Certification Programs:** we make available assessments, including clinical assessments, and award qualifications. We do this through other organizations (for example academic institutions, professional bodies) and directly to students.
- **Language Learning:** we provide courses, tools, and assessments for example English Language Learning which enable students to gain and evidence new skills and qualifications.
- **Workforce Skills:** we work with employers to help them to better understand and upskill their employees. We also work with employees to help them keep track of their learning pathways, and progress towards accreditations and achievements.
- **Virtual Schools:** we host virtual schools for students who cannot access school in person, for example if they are overseas.
- **Higher Education:** we provide textbooks and course materials directly to higher and further education institutions. In addition to providing traditional hard copy textbooks, we run a subscription Pearson+ service through which students can access digital texts on a subscription basis – depending on your configuration this may include sharing of reading progress with your academic institution.

of our services (e.g., just in time notices at the point of data collection) which should be read together with this policy so that you have a clear understanding of how we process your personal data.

For any questions regarding how we use your personal data, you can contact us at:

Data Protection Officer for the EU and UK: Pearson, 80 Strand, London, WC2R 0RL

EU Representative: Pearson Benelux B.V. (PIB), Kabelweg 37, Amsterdam, 1014 BA, Netherlands

You may also email us at [dataprivacy@pearson.com](mailto:dataprivacy@pearson.com)

## 2. What personal data do we use?

This will depend on the product or service, or type of user "you" are (i.e. student, parent, teacher, instructor, employee, or employer) so please refer to the 'just in time' notices and any FAQs accessible within the product or service.

There are some activities that we would like to make you aware of. We will inform you when these processing activities are relevant. The personal data that we use broadly falls into the following categories:

### Information you provide / information collected during your use of the Service(s)

- Registration and profile information that we use to set up an account or provide you with access to our Services (e.g., your name (and preferred name), country, city, date of birth, email address, username and password, marketing preferences, your group or grade, institution, course, or class identifier). There is additional (optional) registration data that can be provided, including gender or native language. We might also capture the reason you have signed up for a product or service, – which we aggregate for survey purposes. You can also upload a profile picture which may be used on certificates issued and within the user experience where relevant to the product or service.
- Examinations and certifications. Personal data that forms part of your work that is examined or assessed, when you ask for special arrangements and reasonable adjustments for you to perform an examination We will also record your unique candidate number; the results of the examinations that you take; certificates of examination awarded to you; the outcome of any investigation conducted by Pearson into any examination taken by you; the outcome of any appeal by you that is determined by Pearson; and correspondence that is issued to your learning center or other third parties by Pearson.
- Educational Courses and Tutoring. If you register for or purchase educational courses, or online tutoring offered through or by Pearson, personal data will be collected and processed for the purpose of delivering such educational courses to you. This personal data may include assignments, student coursework, responses to interactive exercises, assessments, scores, grades, and teacher/instructor comments. Personal data collected by an educational institution or education provider in connection with their courses and programs are subject to the privacy policies of such educational institution or education provider.
- Purchase information for individuals over 18, personal data associated with the purchase of a product or service (e.g. postal address, phone number and payment information) must be shared. The sharing of this personal data is mandatory and necessary for us to fulfill the contract.
- Proof of identity where permitted by law, we require proof of identity, such as government issued ID that you upload (e.g. passport / driver's license) to extract your name, photograph and expiration date and compare this to a selfie you will be asked to take for the purpose of verifying the authenticity of your ID and matching it to the name and profile picture you give us when you create your profile. This relies on face matching technology using artificial intelligence to ensure that your photographs match but will be shared with Pearson's team of human reviewers if a mismatch is identified (so you will not be, automatically denied access to our Services).
- Customer services information which we collect when you contact us about our Services or otherwise interact with us. For example, if you complete a questionnaire or contact form on a webpage or otherwise request help or information from us, or if you complain about the performance of our Services and send us screenshots of errors that you received when using our Services. We will also collect information as to how you contacted customer services, including the channel of communication that you use.
- User generated data for example personal data contained in documents you upload to our Services, or personal data you share when you support or participate in our forums or customer communities (which may be public or restricted to particular groups or individuals, depending on the circumstances and any preferences you may set).
- Data generated by AI some of the data we process about you will be created or processed using automated technologies. For example, we frequently use algorithms as part of our scoring processes to drive consistency and eliminate bias, we also use the artificial intelligence (AI) tools as part of our language learning applications. This will generally depend on the product or service

- We utilize anonymized and pseudonymized data to enhance the training of our Pearson AI models. This approach ensures that while your data contributes to the development of smarter, more efficient AI, your identity remains strictly protected. We strictly adhere to data protection regulations, ensuring that direct identifiers are never employed in our training processes. Our sophisticated algorithms process this data to support the continuous improvement of our AI systems, all while upholding the highest standards of privacy and security.
- Video, image, and audio recordings which we collect in connection with your participation in a virtual classroom, or during an online assessment or examination. This may involve including images of you, and the audio recordings of your spoken responses and background noise taken during your practice tests so that you can complete the test and receive a score and so that we can fully simulate the test environment for you during practice tests. Note that during these practice tests, we will not be using the face and voice matching technology described in Use of video and recordings) to verify your identity or to identify cheating flags. Please see Use of video and recordings for more information.

### Data that we collect automatically

- Location information (including IP address) which we use to provide you with relevant content based on the country you are logging in from. Also, other device and cookie information (where we have your permission if required by law), login data and device information to provide more personalized content better suited to your needs as a user. Certain services may also offer you the opportunity to share your specific location (via a mobile or other device) in order to access location specific benefits and participate in community events, however such options will always require express consent from an adult and can be withdrawn at any time. Please see the cookie policy accessible when you access the product or service for more information.
- Activity and usage information generated in the course of your using our Services, such as the content you view and post, preferences, responses to interactive exercises, assessment activity and results, teacher or instructor comments, books you have read, assignments that have been taken or assigned and teacher/instructor comments, grades or scores.
- Account linking personal data you provide if you link your Pearson account to our other products and platforms or to third party channels (such as social networks).
- Application and systems log data which could include, in addition to your IP address, internet service provider and browser type, type of device and details of the website, application or email communication you came from before accessing the Services.

### Data we obtain from third party sources

- **Accounts created on your behalf** – we may receive registration and profile data about you for example when another person such as your parent/guardian, teacher, school, or academic institution arranges for your access to our Services on your behalf.
- **Educational Program Support** – if you enroll in an eligible educational program, we may receive personal data from the educational institution for the purpose of providing educational program support services to you. These support services may include course selection and registration assistance, degree audits and assistance to help you be successful and stay on track to complete an educational program and assist you in obtaining financial aid. The personal data may include information about your coursework, grades and other educational records, together with any other personal data that you may choose to share or that may be requested to enable us to provide appropriate support.
- **Enrolment Support.** If you contact or work with an enrolment advisor, we may collect personal data so that we can help you explore eligible educational options, apply for enrolment in eligible educational programs and seek financial aid. The personal data may include information about your employment history and educational background, such as employers, work experience, schools, areas of study, grades, transcripts and other educational records, together with personal financial data and any other data that you may choose to share or that may be requested in the application and enrolment process for an eligible educational program and financial aid.
- **Assessments and feedback** – collected from your teachers/instructors/assessors, for example your assessment results, grades, scores and instructors' comments.
- **Third party product links.** For example if you use a Service to obtain a personalized learning pathway that includes courses from third party providers, those third party providers may provide Pearson with limited data relating to your activity on that course including whether course checkout/onboarding is completed, start and end dates, what was charged for the course, whether or not it was completed and if a certificate was provided upon completion. If this data sharing takes place that will be made clear as part of the Services and before any data sharing takes place.
- **From your assessment center.** Pearson is likely to be informed of any personal data that you provide to your center which is relevant to the Pearson qualification you are taking.

### Special Category Data



data about you from any of the above sources about the following, where applicable.

- your racial or ethnic origin, political opinions, religious or philosophical beliefs and sexual orientation, for purposes such as equality monitoring or providing access arrangements;
- your health, for purposes such as providing access arrangements and/or special consideration;
- your biometric information, for purposes such as the use of face and voice matching technology (please see section *(Use of video and recordings)* for more information);
- alleged or actual crimes relating to examinations that you take, such as alleged fraud.

Please note that where we use our third-party services to Support our own Service (which may include ID verification and facial recognition), those third parties may use the data captured about you for the purposes of improving their technology. Where this activity takes place, it will be signposted, is subject to their own privacy notices and we will link to that privacy notice.

## 3. How do we collect your personal data?

**We collect your personal data in the following ways:**

- Directly when you or someone acting on your behalf (normally a parent or guardian but potentially a teacher or institution if they seek to register you for the Services) provide personal data. When you interact with a product or service or when you engage with our emails. Other examples include when you register to use a product or service, contact us (online or offline) or purchase a subscription for one of our Services.
- Indirectly from specified third parties. This will depend on the product or service so please see the specific statements in the user journeys. This includes personal data from schools / similar institutions (if you have a school access code to access one of our Services). It also includes data from Google where you sign-up using a Google account for authentication purposes. We may also obtain your data from third parties so we can update, confirm or add to the data we collect, such as the validation of postal addresses or credit card information.
- We may also collect publicly available information, including the use of web scraping technologies in accordance with applicable local laws, ensuring that such collection respects your rights and freedoms.

*Note: Some of our Services are available for children (which we define as individuals under 18). If that is the case, we will present information on our data processing in a child friendly way or ask the parent / guardian to explain the relevant points of our privacy notice or share the privacy notice with them where they sign-up on their child's behalf.*

## 4. What about children's personal data?

Pearson recognizes its responsibility to keep children safe online and the need to put additional privacy protections in place to keep younger users safe when they access our Services. As a result, we only collect the minimum data about children that is needed to deliver the service and some features have age-gates to prevent children from inadvertently accessing them or turning them on.

### **When we work on behalf of Schools**

Some of our Services are delivered directly to and on behalf of schools or other academic institutions. In these scenarios, whilst information related to students is shared with us so that students may access our Services, the schools will maintain control over and responsibility for children's personal data. It is the responsibility of the schools to supervise the students and notify parents (if appropriate) in these cases. Please consult your school's (or academic institution's) privacy notice for more information.

### **When our services are delivered directly to children (and their parent/guardian)**

Generally, when our Services are aimed at children or are likely to be accessed by children, we:

- take steps to ensure that parents are informed of our collection and use of their children's personal data and are able to control that use. This can include notifying parents and guardians of our practices with regard to their children's data and provide them with context specific emails and push notifications to alert them to changes in settings relevant to their children's personal data;
- require a responsible adult's name and email address and participation in the registration process (parents and guardians may be required to register and control accounts on behalf of very young children on the understanding that control of the account will

- default all ancillary data processing activities (e.g. profiling, marketing, data sharing and geo-location) to off and only activate them upon the instruction of a parent (which will usually be done by the parent from within the child’s account) and further to the application of the relevant measures / alerts to the users;
- give parents and guardians access to their children’s personal data, or the ability to request it, and to ask us to update or delete their child’s personal data.

Please note that we may require parents or guardians to verify their identity for the purposes of providing consent. This may include credit card verification, the use of government ID or other technology such as facial recognition software. Where such verification is required, we will not retain the data gathered in the course of verification but will instead keep a record of the check that was made after which parents or guardians may be able to confirm their identity via a PIN code, password or similar security feature.

A Privacy Notice for Children is also available [here \(PDF | 212.62 KB\)](#).

## 5. What is the purpose and lawful basis for collecting personal data?

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it.

Ultimately, we collect personal data for the purpose of bringing you the best possible experience when using our Services helping you track your lifetime of learning – whether that be to facilitate account registration, communicate with you, market research and service improvement, personalizing your experience, managing integrations with third party technologies and to comply with laws and regulations and defend and exercise our legal rights. Our basis for doing this is:

- to **perform a contract** (e.g. to provide the Services purchased or accessed);
- with your **consent** (e.g., for marketing activities), which can be withdrawn at any time; and/or
- to comply with our **legal obligations** (e.g. we might have regulatory obligations to report or share information); and/or
- for a variety of business purposes which are in our **legitimate interests** as a commercial provider of educational products and services (as described in further detail on a service-by-service basis via the just in time notices).

If we process sensitive / special categories of personal data (for example biometrics or health data) this requires an additional lawful basis which will either be when it is necessary for reasons of **substantial public interest** (to prevent fraud or cheating) on the **basis of law** which is appropriate to the aim pursued or your **consent**.

We have set out a description of all the ways we will use your personal data and which of the legal bases we rely on to do so, in the table below. In certain situations, we require your data to pursue our legitimate interests in a way which is reasonable for you to expect as part of the running our business and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are.

### Processing where Pearson acts as a controller

Purpose/activity	Type of data	Legal Basis (Including basis of legitimate interest)
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manage and administer your account (where applicable), to facilitate purchases you make and manage payments.

- Educational courses and tutoring information
- Certification programs information
- Examinations and certifications information
- Data generated by AI Educational program support information
- Enrolment support information
- Purchase information
- Proof of identity information
- Customer services information
- User generated information
- Location information
- Activity and usage information
- Account linking information
- Application and systems log information
- Assessments, grades and feedback information
- Other information from third parties
- Special category information

- Necessary for our legitimate interests (to provide services requested by your employer, parent/guardian, school, or other academic institution on your behalf).
- For special category data used in relation to the provision of access arrangements, we will collect explicit consent from you.
- For special category data relating to race, ethnicity, politics, beliefs, or sexual orientation (for example, for equality monitoring or providing access arrangements) we rely on a substantial public interest on the basis of applicable law on the equality of opportunity or treatment.

Communicate with you about your use of the Services, including sending you updates about or request feedback on the Services, new features and changes to our policies.

- Registration and profile information
- Purchase information
- Customer services information

- Performance of a contract with you.
- Necessary for our legitimate interests (to keep our records updated and to study how individuals use our Services).

Verify your identity including for the purposes of virtual examinations and assessments, and proctoring.

- Registration and profile information
- Examinations and certifications information
- Proof of identity information
- Video, image and audio recordings
- Data generated by AI
- Customer services information
- Location information
- Activity and usage information
- Application and systems log information
- Assessments, grades and feedback information
- Other information from third parties
- Special category information

- Performance of a contract with you.
- Necessary for our legitimate interests (to ensure the integrity of assessments/ examinations, to preserve our world-class reputation and ensuring trust in the market).
- For special category personal data, including biometric information:
- explicit consent; or
- processing on the basis of the discharge of a statutory basis where necessary for reasons of substantial public interest (prevention of fraud) on the basis of law which is appropriate to the aim pursued.

some of our Services allow users (e.g. learners) to connect to their Google Drive so they can upload/download documents directly from or into it.

Safeguarding and Well-being. Oversight: To monitor and investigate conduct within the service environment, share pertinent information with relevant stakeholders, and maintain comprehensive records to ensure the safety, security, and well-being of all learners, particularly minors and vulnerable adults. This includes implementing measures and interventions necessary to protect learners from harm, abuse, or neglect.

Personalize the Services and content we provide.

- User generated information

  - Account linking information
  - Application and systems log information
- Necessary for our legitimate interests (to enable you to upload/download information from our Services for example in connection with your online learning experience).
- Registration and profile information
  - Educational courses and tutoring information
  - Certification programs information
  - Examinations and certifications information
  - Video, image and audio recordings
  - Data generated by AI
  - Educational program support information
  - Customer services information
  - User generated information
  - Location informationActivity and usage information
  - Application and systems log information
  - Assessments, grades and feedback information
  - Special category information
  - Incident reports and safeguarding records
  - Communications with learners and guardians
  - Necessary for our legitimate interests (to ensure the safety and well-being of learners, to prevent harm, and to maintain a safe and conducive educational environment).
  - Compliance with a legal obligation (to meet safeguarding responsibilities as required by law).
  - For special category data relating to health, well-being, and incidents of safeguarding concerns, we rely on:
    - Protection of the vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent;
    - Processing is necessary for reasons of substantial public interest, on the basis of applicable law (including safeguarding of children and individuals at risk, and prevention or detection of unlawful acts).
- Registration and profile information
  - Examinations and certifications information
  - Purchase information
  - Location information
  - Activity and usage information
  - Account linking information
  - Application and systems log information
  - Assessments, grades and feedback information
  - Other information from third parties
  - Necessary for our legitimate interests (to study how individuals use our Services, to develop them, to grow our business and to inform our marketing strategy).
  - Consent. For example, where tailored content or advertisements are sent using non-essential cookies or similar technologies via which personal data is obtained.

services (both directly and via social media and other third-party channels).

- Examinations and certifications information
- Purchase information
- Location information
- Activity and usage information
- Account linking information
- Application and systems log information
- Assessments, grades and feedback information
- Other information from third parties

- use our Services, to develop them, to grow our business and to inform our marketing strategy).
- Consent. For example, where tailored content or advertisements are sent using non-essential cookies or similar technologies via which personal data is obtained.

Provide you with targeted advertising based upon your activity on our sites and applications and those of third parties as described in more detail in our Cookie Policies, which can be found on our website, and within our digital services.

- Registration and profile information
- Examinations and certifications information
- Purchase information
- Location information
- Activity and usage information
- Account linking information
- Application and systems log information
- Assessments, grades and feedback information
- Other information from third parties

- Necessary for our legitimate interests (to study how individuals use our Services, to develop them, to grow our business and to inform our marketing strategy).
- Consent. For example, where tailored content or advertisements are sent using non-essential cookies or similar technologies via which personal data is obtained.

Operate, understand, develop and improve our sites, Services, applications and platforms;

- Location information
- Activity and usage information
- Application and systems log information

- Necessary for our legitimate interests (to define types of customers for our Services, to keep our website and Services updated and relevant, to develop our business and to inform our marketing strategy).
- Consent. For example, for processing personal data derived from non-essential analytics cookies.
- When we process your information based on your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on such consent before it is withdrawn. To exercise your rights, see the 'What Rights Do I Have?' section of this policy.

Anonymize personal data, ensuring individual privacy while enabling data utilization. This allows us to derive value from data without compromising individuals' identities.

- Registration and profile information

- Necessary for our legitimate interests (to study how individuals use our Services, to develop them, to grow our business and train our artificial intelligence models).



unlawful activity, violations of our terms of service or community guidelines, and any harmful behavior (including virtual misconduct) by users. This includes actions that compromise the safety, security, and dignity of our educational environment.	<div>- Customer services information</div> <ul style="list-style-type: none"><li>• Location information</li><li>• Activity and usage information</li><li>• Application and systems log information</li><li>• Video, image, and audio recordings</li><li>• Data generated by AI</li><li>• Special category information</li></ul>	provision of digital services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise, and to ensure a safe and respectful environment for all users) <ul style="list-style-type: none"><li>• Necessary to comply with a legal obligation</li><li>• For special category data used in relation to detecting and taking action against cheating, fraud or other irregularities, and misconduct: For reasons of substantial public interest on the basis of applicable law on preventing or detecting unlawful acts, protecting the public against dishonesty and similar, and preventing fraud and ensuring the safety and integrity of the educational environment.</li></ul>
To share information with law enforcement and others, in circumstances where someone’s vital interests require protection, such as in the case of emergencies. These vital interests include protection of your (or in exceptional circumstances someone else’s) life, physical or mental health or integrity or that of others.	<ul style="list-style-type: none"><li>• Registration and profile information</li><li>• Special category information</li></ul>	<ul style="list-style-type: none"><li>• Necessary in order to protect the vital interests of the data subject or of another natural person.</li><li>• Necessary for compliance with a legal obligation</li><li>• For special category data processing necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.</li></ul>
To ensure the safety and security of our staff and visitors and the security of our property.To prevent and detect crime.To assist in the investigation of incidents or accidents.	<ul style="list-style-type: none"><li>• Your name and contact details</li><li>• Your image</li><li>• CCTV recording</li><li>• Purpose, date, and time of your visit</li><li>• Your actions and movements within the monitored areas</li></ul>	<ul style="list-style-type: none"><li>• Necessary to ensuring the safety and security of our staff, visitors, and property.</li><li>• Necessary for preventing and detecting crime.</li><li>• Necessary to assist in the investigation of incidents or accidents.</li></ul>

To obtain further information about how we balance our legitimate interests against your rights and freedoms where applicable, please contact us using the contact details provided under the “Who we are” heading above.

Processing on behalf of institutional customers

Some of our Services are provided on behalf of third parties, for example on behalf of an educational institution or partner (for example your employer) with whom you are affiliated. Where that is the case, the institution in question will be the controller of your personal data it is their responsibility to inform you of the purpose and lawful basis of their processing activities. This will commonly be the case where an institutional customer has purchased access to our Services on your behalf.

- processing your personal data to provide the Services. For instance, processing email addresses for learners in order to issue passwords securely and to send out service messages where necessary;
- to communicate with users regarding service updates and in accordance with this privacy policy;
- for a variety of services, including digital learning services:
  - providing schools (or other academic institutions) with access to the information we hold about their students;
  - analysis of users' use and progress across the service so that we can help learners make progress with their learning. For instance, to evaluate the educational efficacy and effectiveness of the services and to make appropriate recommendations to users and institutional customers based on this evaluation;

For more information, please visit the privacy notice on the website of your educational institution, employer or such other third party who provided you with access to our Services.

Notwithstanding the above, depending on the Service in question there may be instances when our customer (your employer or academic institution) accepts that we have [limited] rights to process your data as a controller in accordance with this Notice, for example to administer your account/relationship with us, to anonymize your personal data ensuring individual privacy while enabling data utilization and to use analytics to improve our Services. We will let you know when this is relevant using just-in-time notices.

## 6. Use of video and recordings

Some of our Services, for example online assessments and examinations take images, and audio or video recordings of you. This can include your spoken responses and background noise taken during tests. We do this:

- to collect your responses so that you can receive a score;
- to simulate the test environment for you during practice tests;
- to verify that the correct person is taking the test;
- to proctor the test to check that you are not cheating.

This includes use of special category face and voice personal data, and matching technology provided by our service providers, using artificial intelligence to ensure that the test responses match the reference voice and photograph we have on file for you and that there are not any cheating “flags” raised during your test.

This technology does not involve real-time surveillance and flags do not track emotional behaviors like your facial movements during the test, but will track whether the recording matches against the data we hold on file for you based on objective pre-defined criteria.

Where a flag is raised, automated or otherwise Pearson’s human reviewers will review any mismatch in IDs and/or where potential cheating has been identified and, in those cases, we will not release a test completion certificate and will either (i) issue a free retest; or (ii) where cheating has clearly taken place and this has been confirmed through human review, we may suspend your account. You have the right to appeal any account suspensions, see our websites for our security requirements and policies.

Note that during these practice tests, we will not be using the technology mentioned above to verify your identity or to identify cheating flags.

We will also process still or video images from your device during some of our online learning services, for example to allow you to participate in virtual classrooms.

Please note in some instances we will use third parties to support facial recognition and ID services for matching during tests and assessments. Those third parties may use the data captured about you for the purpose of improving their technology. Where this activity takes place, it will be signposted, is subject to their own privacy notice and we will link to that privacy notice

### Visitor Data and CCTV Monitoring in our offices

At Pearson, we are committed to ensuring the safety and security of our employees, visitors, and assets. As part of this commitment, we collect and process certain data when individuals visit our offices. We believe in transparency regarding our data processing practices including the use of Closed-Circuit Television (CCTV) systems.

and is retained in accordance with our retention schedule.

We are committed to transparency regarding our use of CCTV. Clear signage is placed in areas where CCTV cameras are operating, informing individuals that they are being recorded and the purposes of the surveillance.

## 7. Account linking

Some of our Services provide you with the ability to connect your account to other platforms and services. For example, some digital learning services allow learners to connect their accounts to Google Drive (and similar platforms) so they upload/download documents directly from or into it.

Before you connect to a third-party platform, you will receive a prompt asking you to click "Allow" to enable the Services to connect to the third-party service (e.g. Google Drive). In Google Drive, you may remove this connection in the My Account settings for your Google account at any time.

Pearson will use this connection to access the linked service only for the purpose of uploading or downloading documents that you specifically select with limited metadata to allow identification and retrieval, so that you can access and use the documents within the Services or download them to the third-party service. Pearson will use, process and store these documents and associated personal data in accordance with this privacy policy.

## 8. Automated decision making

In some instances, our use of your personal data will result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically based on a computer determination (using software algorithms), without our human review. For example, we use automated decisions as part of our scoring processes and as part of our language learning applications. This helps us to drive consistency and mitigate human bias. We have implemented measures to safeguard the rights and interests of individuals whose personal data is subject to automated decision-making, for example When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contacting us at [dataprivacy@pearson.com](mailto:dataprivacy@pearson.com).

## 9. Marketing communications and opting out

Depending on our relationship with you, and the service you use, we will send you marketing communications where you have not told us that you wish to unsubscribe from marketing, or where you signed up to receive such updates. Contact details for teachers, learners who are 18 or over, and adult subscribers to the Services may be used for these purposes:

- to contact the user with more information about our Services and those of our group companies, except where the user has told us not to;
- to invite the user to participate in surveys, discussions and prize draws and ask for the user's views on our Services via online surveys and discussion forums.
- participation in surveys and discussion forums is entirely voluntary. Users may unsubscribe from being contacted for these purposes at any time. Survey information will be used for market research with the aim of improving our Services.

Marketing will only be sent to any user aged under 18 registered to use the Services where permitted by law and subject to having obtained prior consent, which may include verified parental consent where appropriate. Such consent may be withdrawn at any time.

We will not send marketing emails to a user who has opted out of receiving them. Any marketing communications we send will include an unsubscribe link at the end of the email.

## 10. How long will we store your personal data or personally identifiable information?

We will keep your personal data only for as long as necessary to fulfil the purposes for which we are processing your personal data unless the law permits or requires longer. For example:

- **Pearson services.** When you use our Services directly, or another creates a profile on your behalf. We will generally keep your personal data for the entire duration you use our Services and a reasonable period after. In general, after a year or so of inactivity Pearson reserves the right to email users that their account will be deleted after six months if there is no further activity.
- **Information kept for longer periods.** The nature of some of our Services for example Virtual Schools, Qualifications mean it is appropriate for us to keep your data for longer periods. We will always retain it for longer if the law requires this. For example:
  - It is necessary to keep **qualifications information** (including candidate name, gender, address, examination result, qualification(s) awarded, grade information) for a minimum of forty years and sometimes indefinitely.
  - In relation to Safeguarding Records regarding children and records of concern about adult behavior towards children, certain safeguarding information is retained for a longer period.
  - Where a longer period is required by law for example, we keep invoices and certain payment information for 6 years plus the relevant financial year in which the invoice was issued.
- **Information kept for shorter periods.** We store certain videos, images, and audios for up to six months after a test or virtual lesson is complete.

The specific periods we keep your personal data differ depending on the nature of the Services or products you receive from the different parts of our business, so please see the FAQs that can be accessed within that product and service.

## 11. Disclosures and transfers

### Disclosures to Group Companies

- We may disclose personal data or personally identifiable information to other companies within the Pearson family, so that we can analyze, test and develop new exciting features for our Services.
- With your consent (where required by law), we would share your personal data with the Pearson family so that they can inform you about the relevant Services that our group companies offer – these would only be products and services which we think you would be interested in. Please note information on individuals aged under 18 will not be shared with group companies for marketing purposes.

### Disclosures to Businesses, Partners and Trusted Organizations

For certain Services, we work closely with employers and educational institutions who are making the service available to staff and learners. This can involve the sharing of personal data with those parties for purposes such as safeguarding, monitoring application usage/progress, and data relating to misconduct, cheating or misuse of systems. They may have their own privacy notices for their processing of your personal data as a controller, so please make sure you request this and read them.

### Other Disclosures

We may disclose personal data in the following circumstances:

- when we share it with external providers and data processors such as data centers, web hosts, cloud storage and cloud software providers, customer support providers, payment processors, debt collectors, accountants, insurers and other providers which assist us with the delivery of our Services;
- when we share it with prospective sellers or buyers of our business or assets (and their professional advisors) to investors and our professional advisors, including in the event that we experience financial difficulties;
- for learners under 18, with the parent / guardian, where they have purchased access to the product or service on behalf of the learner;



revoked by users at any time), and

- when we are required or requested to share it with regulators, law enforcement, courts and other relevant parties for the purpose of enforcement action, legal or contractual compliance and reporting purposes. Also, to enforce our terms of use, to ensure your safety and that of other learners and to protect our rights and property or those of others.

## Data transfers

We are part of a global organisation and use global service providers. Accordingly, data may be processed and shared outside of the country in which you live, however, we will only do this in compliance with local laws and where we have appropriate measures to ensure that the recipient of your data provides the same standard of protection as required by applicable data protection laws.

Where you are a resident of the European Union or the United Kingdom, we will only transfer your personal data: (i) to countries that have been deemed to provide an adequate level of protection by the European Commission for personal data listed here (or equivalent in the United Kingdom); and/or (ii) where we have specific contracts approved by the European Commission and information Commissioner's Office which give personal data the same protection. The safeguards we use include:

- the European Commission's Standard Contractual Clauses as issued on 4 June 2021;
- the European Commission's Standard Contractual Clauses together with the UK Addendum.

This is how transfers of personal data between our group companies will be safeguarded. All group companies are required to protect personal data that they process from Europe (and the UK) in accordance with European Union (and UK) data protection law.

Our Standard Contractual Clauses can be provided on request. Please note that some sensitive commercial information may be redacted from the Standard Contractual Clauses. We have also implemented Standard Contractual Clauses with our third-party service providers and partners and further details can be provided upon request.

# 12. What rights do I have?

Depending on the country you are in, you may have different rights in relation to your personal data.

Where you are a resident of the European Union or the United Kingdom:

- **Right of access.** You can ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process. These exemptions include situations where the information requested also includes personal data about somebody else.
- **Right to rectification.** You can 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 can ask us to erase your personal data in certain circumstances.
- **Right to object to processing.** You can object to the processing of your personal data, including profiling, where we are processing it on the basis of a legitimate interest.
- **Rights related to automated decision making.** In relation to decisions based solely on automated processing which produce legal or similarly significant effects, you have the right to obtain human intervention in the decision-making process, and to express your views about or contest such a decision. Please see [section \(Automated Decision Making\)](#) for more information.
- **Right to opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us (using the contact details indicated above).
- **Right to restriction of processing.** You can ask us to restrict the processing of your information in certain circumstances.
- **Right to withdraw consent.** Where we are relying on consent to process your personal data, you can withdraw it at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right to data portability.** This only applies to the information you have given us. You can ask that we transfer the information you gave us from one organization to another or give it to you. The right only applies if we are processing information based on performance of a contract and/or your consent.



in which case we may take up to an extra two months to respond but we will inform you where this is the case). Where we ask you for proof of identification, the one-month time limit does not begin until we have received this. If we require any clarification on the scope of the request, the one-month deadline is paused until we receive that information.

You also have the right to make a complaint at any time to a supervisory authority, including your local authority. Of course, we would appreciate the chance to deal with your concerns before you approach a supervisory authority.

California residents should read our Supplemental Privacy Statement for California Residents in conjunction with this privacy policy which explains our commitment to comply with California law for personal information of California residents.

Under UK and EU data protection laws it is the data controller's responsibility to respond to your data protection rights requests.

Please note the data controller for your personal data may not be a Pearson entity in all cases, as depending on the service you are accessing our role may be limited to handling data on behalf of another organization (for example your employer or academic institution). Our role in relation to the personal data will be confirmed to you in the "just in time notices" and in the terms and conditions.

For Services in the United Kingdom and Europe, Pearson Education Limited or Pearson UK Limited are normally to be the controlling Pearson entity, but further specific details are available in the terms and conditions applicable to your Service.

# 13. Changes to this privacy policy

We may update this policy or our specific statements from time to time. We will always include the date of a new version so that you know when there has been a change. Where required by law, we will notify you of any material changes.

This policy was last updated on 6 August 2024.

[CALIFORNIA SUPPLEMENT](#)

[PRIVACY NOTICE SUMMARY](#)

[PRIVACY CENTER](#)

[CHILDREN’S NOTICE \(PDF | 212.62 KB\)](#)

	<b>Explore</b>	<b>Support</b>	<b>Insights</b>	<b>Major Businesses</b>	<b>About Pearson</b>
	School	School Support	PreK–12 Blog & Events	Assessments	Our Company
	College	College Support	Teaching & Learning Blog	Higher Education	Investor Relations
	Work	Work Support	College Student Blog	International Schools	Careers
United States		Global Permissions	College Events	Languages	Our Employee Experience
		Global Rights Licensing	Work Blog & Events	Pearson VUE	Efficacy & Research
		Report Piracy	Product Evidence	Virtual Schools	Power of Learning
				Workforce & Career Development	