



Data Protection Policy

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Introduction

Quest Assessments is dedicated to its obligations under data protection. This document details how we comply with the General Data Protection Regulations (GDPR) as well as other data protection laws.

Quest Assessments, and its products Quest Progress and Quest Admissions, are brand names of Atom Learning Ltd. The legal entity that customers are forming an agreement with is Atom Learning Ltd.

Scope

This policy applies to all personal data and special categories of personal data processed by Quest and as defined under the UK General Data Protection Regulation (UK GDPR).

The GDPR is a regulation under EU law on data protection, which sets out a comprehensive framework relating to the processing (i.e. collection, use storage and disclosure) of personal data within the European Union.

Despite the fact that the UK has left the European Union, the rules and regulations set out in the GDPR are also applied in UK law under the Data Protection Act 2018.

The [Information Commissioner's Office](#) is a good source of information on GDPR and the UK law surrounding it.

Any references to "GDPR Compliance" in our documentation specifically refer to compliance with the Data Protection Act 2018 in the UK, although this is compatible with the wider GDPR across the EU.

Our Commitment

At Quest, we are committed to ensuring that data is processed in accordance with UK GDPR regulations:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Definitions

Data Subject	Any living individual who is the subject of Personal Data held by an organisation.
Data Controller	A data controller determines the purposes and means of processing personal data.
Data Processor	A processor acts under the instructions of the controller only, by processing personal data on behalf of the controller.
Personal Data	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly.
Data Processing	This refers to any operation or set of operations performed on personal data.
Individual Rights	In data protection law, people have rights over their data. These allow individuals to understand what data you have collected, how they are being used, and make changes.
Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Special Categories of Personal Data	This is personal data that needs more protection because it is sensitive or private.
School customer	The school, institution, or company that has purchased the Quest Progress product.
School end-user	A student who uses Quest Progress to complete assessments.

Contact Details

Quest does not meet the criteria for the mandatory appointment of a Data Protection Officer. We are not a public body and our activities do not require large-scale, regular and systematic monitoring of individuals, nor do they involve large-scale processing of special category data.

However, as a company, we take the protection of the data entrusted to us by our customers very seriously. Our data protection governance is led by our Chief Technology Officer (CTO).

Quest can be contacted regarding any GDPR queries at:

- gdpr@questassessments.com

Data Collected

In the process of providing the Quest platform, we collect, process and store personal data.

Types of Data

This section lists each piece of personal data that we collect from our users.

Quest Progress

Data	Justification and Use
Student's full name	So we can address them correctly in the app.
Student's date of birth	Required for age-based scoring.
Students with ESOL	Enables teachers to view/analyse data based on those characteristics
Students with SEN markers <i>See below for more information</i>	Enables teachers to view/analyse data based on those characteristics
Teacher's name	So we can address them correctly in the app.
Teacher's work email address	Used for login and communication

Special Category Data

Since data about students' SEN classifications is technically health data, this data falls under the definition of Special Category Data. In order to provide the best protection to this data, the Quest platform is designed to only require the minimum amount of information with regard to this. We only collect a single letter code and nothing else about the SEN provision or history for the student:

Code	Pupil SEN Provision
N	No SEN

S	Statement
E	Education, Health and Care (EHC) plan
K	SEN support

Quest Admissions

Data	Justification and Use
Student's full name	So we can address them correctly in the app.
Student's date of birth	Required for age-based scoring.
Teacher's name	So we can address them correctly in the app.
Teacher's work email address	Used for login and communication

Processing Data

In our relationship with schools, schools are the Data Controllers of staff parent and pupil-related data (the "data subjects"). The Data Controller is the person or organisation that determines what data is extracted and how; what purpose it is used for, and who is allowed to process the data. UK GDPR increases the responsibility schools have to inform parents about how their data and their children's data are being used and by whom. When schools provide us with staff and pupil data, Quest becomes the Data Processor. We are trusted with the data provided to us and must process it in a UK GDPR-compliant manner, but we do not control the data.

Sub-processors

Quest uses several sub-processors to store and process data. From time to time, our business changes, adds, or removes sub-processors as our platform and product evolve. Whenever we engage a new sub-processor, we take steps to ensure they are UK GDPR compliant and review their Data Processing Agreement.

Where we are the Data Processor, we do not make changes to sub-processors without seeking prior permission from the Data Controller, except for sub-processors that provide data storage and transmission services to Quest. This exception is for practical reasons, as due to the number of customers we have and the sometimes rapid nature of the deployment of such services, it is not possible to seek individual permission from every Data Controller.

We maintain a list of our current sub-processors: <https://questassessments.com/docs>

Lawful Basis for Processing

As the Data Processor it is generally not within our remit to determine the lawful basis for processing the personal data you upload to the Quest platform. It is the Data Controller's (the School) responsibility to ensure that they have established a lawful basis before processing any data on the Quest platform.

Where we are the Data Controller, we rely on Contract fulfilment (Article 6 1 (b)) in the first instance and, where that is not applicable, on legitimate interest as the lawful basis on which we collect and use your personal data.

Marketing

Quest send may send marketing material to prospective customers via email, post or other channels. As Quest is a Business-to-Business (B2B) product and we are making contact with individuals or organisations in their professional capacity, these interactions are not governed by UK GDPR. Instead they are carried out in accordance with Privacy and Electronic Communications Regulations (PECR).

Atom Learning Ltd, which Quest is part of, does have other products (for use at home) which some Quest end-users may also use, and therefore these people may receive marketing material through their membership in our other products.

Cookies and Advertising

We use cookies for essential functionality on the Quest Progress platform (e.g. registering authenticated sessions). The platform also implements some 3rd party cookies.

Quest may use digital advertising platforms to serve adverts to potential customers. Some of these services use cookies to track successful conversions. There is more information on this in our [Cookie Policy](#).

The platform also collects some data on user behaviour within the app which is used to assess the effectiveness of features as well as gradual rollouts of updates. No personal data is used in this tracking.

Children under 16

As Quest is a product providing learning materials for children, we are required to store and process data from children under 16.

We also have robust safeguarding procedures and policies in place to ensure all of our students experience Quest Progress in a safe way.

Data Retention

User-Inputted Data

We ensure data inputted into the system is only retained for as long as is necessary. Quest retains data as long as the school is using the platform or deletes data after 6 years if no longer in use. The school can request a permanent deletion of any data at any time by emailing gdpr@questassessments.com.

Log Data

We retain log data (e.g. access logs to the servers) which contain some personal data (e.g. IP address) for a minimum of 1 year. These logs are then periodically deleted by the infrastructure team.

Individual Rights

As we are the Data Processor in the vast majority of use cases, we will generally direct any data subject wishing to exercise their rights under Articles 12-23 to contact the Data Controller (the school customer).

Any representatives of Data Controllers that need assistance with complying with an individual request should contact gdpr@questassessments.com.

Data Breaches

We have internal policies for dealing with any breaches that are identified and, where necessary, contacting the affected Data Controllers to let them know and assisting with reporting to the ICO if appropriate. Any breach, regardless of severity, is logged internally and analysed for impact and future mitigation purposes.

Training

All employees and contractors who come into regular contact with personal data receive data protection training and refresher courses as required. Data protection will also form part of continuing professional development, where changes to legislation or regulation occur.

Policy monitoring

The CTO is responsible for monitoring and reviewing this policy. This policy shall be reviewed annually, or more frequently if appropriate, to reflect relevant legislative, regulatory, or organisational developments.