Data privacy FAQs

Answers to commonly asked questions about the important topic of student data privacy, when using Persona Life Skills.

Q: Is Persona GDPR compliant?

A: Yes. Persona is registered with the UK Information Commissioner's Office (ICO) and is fully compliant with the EU General Data Protection Regulation (GDPR). We are also fully compliant with the UK Data Protection Act 2018.

Q: Where can I find Persona's Privacy Policy?

A: Our full privacy policy: https://www.persona-life.com/privacy-policy/

Q: Do you have an easy-to-understand version for students?

A: Yes, a one-page student privacy summary: https://www.persona-life.com/privacy-summary/.

Q: Is Persona a Data Controller or Data Processor under GDPR?

A: Based on the ICO definitions, while there is some overlap, the best fit definition for Persona is Data Controller (58%). The school also remains a Data Controller. Persona also conducts some Joint Data Controller (40%) and some Data Processor (20%) activities, therefore we make sure we comply with GDPR requirements on all three types of activity.

Q: What student personal information do we need to provide?

A:

- First name (or initial, or other identifier)
- Last name (or initial, or other identifier)
- Gender (female, male or other)
- School email address
- Date of birth
- School/college name
- School/college year or grade

Q: Where is students' personal information stored?

A: Students' and Teachers' personal information is stored in the UK, on the Google Cloud Platform (GCP). GCP is compliant with information security international standards ISO/IEC27001, ISO/IEC27017 and ISO/IEC27018, among others.

Q: Is the students' personal information you store encrypted?

A: Yes. Data stored on GCP are 'encrypted at rest' meaning your information is always encrypted by default, even when not being accessed. We encrypt your information using Transport Layer Security (TLS) – the more secure successor to SSL – when it is being transferred to/from your computer, tablet or phone and the GCP cloud server.

Q: What is your student persona data retention policy?

A: We retain student personal data (always encrypted) as long as the student remains at the school and the school is a Persona Life Skills subscriber. If either or both of these conditions change, and the student is inactive for six months, we will then ask them if they want to retain their account or have their data archived for two years and then deleted.

Q: Why do you need personal information such as names and email addresses?

A: The student's email address is used as their username for Persona Life Skills, allowing us to provide a personalised experience for each student and save their progress. It is also used to contact them when needed, eg. to reset their password. Names are used to make the platform personal to the student, for the teacher to monitor their individual progress, and for other students in their group (eg. class or tutor group) to see them on the Persona Community screen (first name and last initial only).

Q: Do you require or encourage students to upload a photo?

A: No. Students may upload a photo or other avatar image if they wish to, but we do not ask or encourage them to do so.

Q: We do not want to use students' full names in Persona Life Skills. Is this possible?

A: Yes, you can use initials, or full first-name and last-name initial, or any words you like for students' names. Remember, students will be able to see the name you use for them in the platform. It's also best if their teacher can recognise whose record they are looking at when they review students' progress and input.

Q: How much of the information students input can their teacher see?

A: Everything the students type into the platform, and their choices in activities such as drag & drop and rankings, can be seen by their Teacher and the school Admin. The only information in the app that Teachers/Admins cannot see are the individual answers to the personality insights questions. These are all multi-choice on a scale of 1-8, with no written input.

Q: How often do you conduct student surveys and for what purpose?

A: We conduct student surveys with specific schools, who have agreed in advance, to gather improvement feedback on Persona Life Skills from their students who have used the platform. In future we may conduct other surveys to understand more about students' interests and opinions on various topics, eg. media, music.

Q: If you provide data to your marketing partners, do you notify the school in advance?

A: No. The data shared will only ever be anonymised and aggregated information from several schools, with no possibility of individuals or schools being identified.

Q: Do you promote your products or send company news to student emails?

No. Emails about our products and company news are only ever sent to Admins and Teachers, unless a student has signed up for our newsletter via our public website.