

PRIVACY POLICY

likelyeducation.com

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This website and platform (the “Services”) are operated by LIKELY Srl. We take your privacy very seriously and ask that you read this privacy policy carefully, as it explains what personal information we collect, what we do with it, and who it might be shared with.

This policy should be read together with our Terms and Conditions and our Cookie Policy.

We may change this privacy policy from time to time. Please check it occasionally to stay aware of the version that applies each time you use our Services.

1. WHO WE ARE

We are LIKELY Srl, a company registered in Romania under company registration number (CUI) **55120624**, registered with the Trade Registry under number J2026042779003, with its registered office at București Sectorul 1, Strada Nicolae Coculescu, Nr. 1C, ASTRONOM, Etaj 2, Ap. 14 (“LIKELY”, “we”, “us”, or “our”).

For the personal data described in this policy where we act as controller (see Clause 3), we are responsible for, and control the processing of, that personal information under the EU General Data Protection Regulation, the UK General Data Protection Regulation, the Data Protection Act 2018, and Romania's implementing data protection legislation.

Because we serve Users across the EU, the UK, and elsewhere, our lead supervisory authority is Romania's data protection authority, ANSPDCP (www.dataprotection.ro). UK-based Users may also complain to the UK Information Commissioner's Office (ICO) — see Clause 14.

2. REPRESENTATIVE

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions:

- United Kingdom (UK)

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter, or make use of your data subject rights, please visit the following website: <https://app.prighter.com/portal/14737229519>

3. WHO THIS POLICY APPLIES TO, AND WHEN WE ARE CONTROLLER OR PROCESSOR

This policy applies to personal information we process about:

- Educators — teachers and other School staff who register for and use the Services;
- Schools — the educational institution an Educator represents, including billing and administrative contacts;
- Students — individuals given access to the Services by an Educator, or who register directly for Independent Practice;
- prospective customers and recipients of our marketing communications; and

- visitors to our website.

3.1 Educator and School account data

In respect of an Educator's own account data (their name, email address, and School billing/administrative details), we act as the controller.

3.2 Student Personal Data provided by a School

Where a School or Educator provides us with a Student's name and email address in order to create a Class and assign Tasks, we process that Student Personal Data as a processor, acting only on the School's instructions. The School is the controller of that data. If a Student (or their parent or guardian) wishes to exercise a data protection right in relation to data provided in this way, this should be directed to the School in the first instance, who will instruct us accordingly. We remain happy to assist directly where needed — see Clause 13.

3.3 Independent Practice purchased directly by a Student

Where a Student (or their parent or guardian) purchases an Independent Practice subscription directly, rather than through their School (see Terms and Conditions, Clause 6.3), we act as controller in respect of the additional personal data generated by that direct relationship — for example, billing details and the Student's or parent's contact information used to manage that subscription. We remain a processor, on the School's instructions, for the underlying Student Personal Data (name, email, Class, and Task history) originally provided by the School..

4. WHAT INFORMATION WE COLLECT

4.1 Information provided by Educators and Schools

When an Educator registers, we collect their name, email address, password, and School name. When a School subscribes, we collect billing and administrative contact details and payment information.

4.2 Information provided about Students

When an Educator creates a Class, we collect the name and email address of each Student added. As Students use the Services, we process their Task selections (Standard, Stretch, or Support), their responses, scores, and personalised feedback.

Where a Student purchases Independent Practice directly, we also collect the payment details and contact information needed to manage that subscription (Clause 3.3).

4.3 Payment information

Payment card details are processed by our payment processor, **Stripe**, and are not stored on our own systems. Please refer to their privacy notice for further information on how they process this data.

4.4 Information we collect automatically

Our Services may automatically collect certain technical information, such as IP address, browser type and version, device and operating system information, and general usage data (for example, pages visited and features used). This is used to operate, secure, and improve the Services.

4.5 Information from third parties

We may occasionally receive information about you from other sources, such as a School's administrative staff acting on behalf of an Educator or Student.

5. HOW WE USE YOUR INFORMATION AND OUR LEGAL BASIS

We process personal information for the following purposes:

- **To provide the Services** — creating and managing accounts and Classes, assigning and completing Tasks, and generating scores and feedback. Legal basis: performance of a contract (with the School, Educator, or directly with a Student for Independent Practice).
- **To process payments and manage subscriptions** — legal basis: performance of a contract, and compliance with our legal obligations (for example, tax and accounting records).
- **To provide customer support** — legal basis: performance of a contract and our legitimate interest in resolving issues efficiently.
- **To protect the Services and prevent misuse** — for example, automatically flagging an account after 10 reattempts of a single Task as a possible sign of account sharing. Legal basis: legitimate interests, in keeping the Services secure and fair to all Users.
- **To communicate with prospective and existing customers about our products** — legal basis: legitimate interests (for Schools and Educators, as business contacts) or consent, where required by applicable law.
- **To comply with our legal obligations** — for example, responding to a lawful request from a regulator or law enforcement body.

Where a specific processing activity requires the School's or a User's explicit consent under applicable law, we (or the School, where it is the controller) will obtain that consent before the processing takes place.

6. WHO WE SHARE YOUR INFORMATION WITH

We use a limited number of third-party service providers to help us run the Services, currently: Supabase (database and backend infrastructure), Stripe (payment processing), and GitHub (website hosting). Each provider only processes personal data on our documented instructions, under a written contract that requires them to protect it in line with applicable data protection law. Each provider only processes personal data on our documented instructions, under a written contract that requires them to protect it in line with applicable data protection law.

We may also disclose personal information to:

- law enforcement or regulatory authorities, where required by law or to prevent unlawful activity;
- professional advisers (for example, our accountants or lawyers), where necessary; and
- a third-party purchaser, if we sell all or part of our business, in which case relevant account information would be a transferred business asset.

We do not sell personal information to third parties.

7. INTERNATIONAL TRANSFERS

We store personal data on servers located in the European Union (specifically, EU data centres utilized by our hosting and backend providers). Where we or our service providers transfer personal data outside the UK or the European Economic Area, we will ensure appropriate safeguards are in place beforehand — for example, an adequacy decision, or Standard Contractual Clauses (and, for transfers involving UK personal data, the UK's International Data Transfer Addendum).

8. HOW WE KEEP YOUR INFORMATION SAFE

We use technical and organisational measures designed to protect personal information, including:

- access to user accounts is controlled by a unique password;
- encryption of data in transit (TLS/HTTPS), and at rest;
- restricting administrative access to personal data to authorized administrators using multi-factor authentication (2FA);
- enforcing database-level Row Level Security (RLS) policies to ensure users can only access their own data;
- utilizing automated cloud database backups;
- storing all application API keys and secrets securely in protected environment variables; and
- processing payments entirely through PCI-DSS compliant third-party providers (Stripe) so full payment card numbers are never received or stored on our servers.

No method of transmission over the internet or electronic storage is completely secure, so while we work hard to protect your personal information, we cannot guarantee its absolute security.

9. HOW LONG WE KEEP YOUR INFORMATION

We keep personal information for as long as necessary to provide the Services and for a limited period afterwards, currently **6 months after subscription ends, then deletion or anonymisation**. Where a School instructs us to delete a Student's data sooner, or asks us to delete it at the end of the relationship, we will do so, subject to any legal obligation to retain certain records (for example, billing records for tax purposes).

10. CHILDREN'S PRIVACY

The Services are primarily designed for learners aged approximately 14–16, though they may also be used by other age groups. Where a Student accesses the Services through their School (Clause 3.2), the School is responsible for ensuring it has the appropriate authority and, where required, parental or guardian consent, to provide us with that Student's personal data, in line with the School's own safeguarding and data protection policies.

Where a Student purchases Independent Practice directly and is under 18, we rely on the Student (or their parent or guardian, where applicable) confirming they have the necessary permission to do so, as set out in our Terms and Conditions.

Note: Given the significant number of under-18 UK Users you're expecting, it's worth having a lawyer confirm your approach against the ICO's Age Appropriate Design Code (Children's Code), which sets specific expectations for services likely to be accessed by children — for example around default privacy settings, profiling, and nudge techniques — separately from the general UK GDPR obligations already covered in this policy.

11. MARKETING

We may contact prospective and existing School and Educator customers about our products and services. You can opt out of marketing communications at any time by using the unsubscribe link in any marketing email, or by contacting us using the details in Clause 14. This will not affect service-related communications that are necessary for the operation of your account.

12. COOKIES

For information on the cookies we use and how to manage your cookie settings, please see our Cookie Policy at likelyeducation.com/cookies.

13. YOUR RIGHTS

Subject to applicable law, you have the right to:

- find out how we process your personal data;
- request access to, and a copy of, the personal data we hold about you;
- request that inaccurate personal data be corrected;
- request erasure of your personal data in certain circumstances;
- restrict, or object to, our processing of your personal data;
- request portability of personal data you have provided to us; and
- where we rely on consent, withdraw that consent at any time.

If You are an Educator or School, please contact us directly using the details in Clause 14 to exercise these rights.

If You are a Student (or a parent or guardian) whose data was provided to us by a School (Clause 3.2), please contact Your School in the first instance, as they are the controller of that data and will instruct us accordingly. We are happy to assist Your School with such requests, and you may also contact us directly if you are unsure who to approach.

If You purchased Independent Practice directly (Clause 3.3), you may contact us directly in relation to that data.

You also have the right to lodge a complaint with a supervisory authority. In Romania, this is ANSPDCP (www.dataprotection.ro). UK residents may also complain to the Information Commissioner's Office (ICO) at ico.org.uk. We would appreciate the chance to address your concerns directly before you approach a supervisory authority, though this is entirely your choice.

14. HOW TO CONTACT US

If you have any questions about this policy, or wish to exercise any of your rights, please contact:

LIKELY Srl

București Sectorul 1, Strada Nicolae Coculescu, Nr. 1C, ASTRONOM, Etaj 2, Ap. 14

Email: office@likelyeducation.com

Data protection contact: **Anne-Marie Levins** privacy@likelyeducation.com

UK representative (Article 27 UK GDPR): **Prighter Ltd, 20 Mortlake Mortlake High Street, London, SW14 8JN, United Kingdom**

15. CHANGES TO THIS POLICY

We may update this privacy policy from time to time. The “Last updated” date at the top of this page shows when it was last revised. Where we make material changes, we will take reasonable steps to notify Schools and Educators, such as by email or a notice on the Website.