



Product Privacy Policy

MyProgress, MyShowcase.me, and OpenBadges.me

Version 2.0

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MyKnowledgeMap Limited

Contents

1. Data Controller and Data Processor Roles
2. Information We Collect
3. How We Use Your Information
4. Sharing Your Information
5. Sub-Processors
6. Data Location and International Transfers
7. Data Security
8. Data Retention
9. Your Privacy Rights
10. Cookies
11. Children's Privacy
12. Changes to This Policy
13. Contact Us

Introduction

MyKnowledgeMap Limited ("we", "our", "us") is committed to protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our MyProgress, MyShowcase.me and OpenBadges.me software-as-a-service (SaaS) platforms ("Service").

By accessing or using the Service, you agree to this Privacy Policy.

Effective Date: [TO BE CONFIRMED]

Previous Version: 1st September 2024

1. Data Controller and Data Processor Roles

Understanding who is responsible for your data is important. Depending on the type of data, different organisations have different responsibilities:

1.1 Your University or Employer as Data Controller

For the following data, **your university or employer is the data controller** and determines why and how this data is processed. MyKnowledgeMap acts as a **data processor**, processing this data only on their instructions:

- Your name and learner/employee identifier
- Your email address
- Your work or placement location
- Your study programme or course information
- Content you upload to the platform (evidence, documents, reflections)
- Academic assessments, feedback, and grades
- Your progress and completion records

Tip: For questions about how your university or employer uses this data, please refer to their privacy notice.

1.2 MyKnowledgeMap as Data Controller

For the following data, **MyKnowledgeMap is the data controller** and determines why and how this data is processed:

- Platform analytics and usage patterns (how users interact with features, pages viewed, time spent)
- used to improve and develop our Service
- Technical performance data (error logs, system diagnostics) - used to maintain service reliability
- Device and browser information collected for security monitoring
- Data collected through third-party integrations we have chosen to implement (such as ShareThis for social sharing)

1.3 Authentication Data

Authentication cookies and tokens (used to keep you logged in) are processed by MyKnowledgeMap as a **data processor** on behalf of your university or employer, who requires users to be authenticated to access the Service.

2. Information We Collect

2.1 Personal Information

We collect personal data that you, your university, or employer provides to us, including:

Data Type	Source	Controller
Name	University/Employer	University/Employer
Email address	University/Employer	University/Employer
Username	University/Employer	University/Employer
Online identifiers	University/Employer	University/Employer
Educational/work content	You (via uploads)	University/Employer
IP address	Automatic collection	MyKnowledgeMap

2.2 Automatically Collected Information

When you access our platform, we automatically collect:

Usage Data

Information on how you use the Service, such as the features you interact with, pages you view, and time spent on the platform.

Device Information

Information about the devices used to access our Service, including IP address, browser type, operating system, and device identifiers.

Cookies and Tracking Technologies

We use cookies, web beacons, and similar technologies to track your use of the platform. See [Section 10: Cookies](#) for details. You can control cookie settings in your browser.

2.3 Third-Party Information

We may receive personal information from your university or employer via automated system integration (such as single sign-on or student record systems).

3. How We Use Your Information

We process personal data for the following purposes:

Purpose	Description	Lawful Basis	Controller
Service Delivery	Creating and managing your account, delivering features, processing your submissions	Performance of contract	University/Employer
Communication	Sending transactional emails such as account notifications, password resets, or support responses	Legitimate interests	MyKnowledgeMap
Platform Analytics	Analysing aggregated user behaviour, trends, and preferences to improve our platform	Legitimate interests	MyKnowledgeMap
Security Monitoring	Detecting, investigating, and preventing fraudulent activities, unauthorised access, or security breaches	Legitimate interests	MyKnowledgeMap
Legal Compliance	Complying with legal obligations and responding to lawful requests by public authorities	Legal obligation	Both (as applicable)

3.1 Legitimate Interests

Where we rely on legitimate interests as our lawful basis, we have conducted a balancing assessment to ensure our interests do not override your rights and freedoms. You have the right to object to processing based on legitimate interests - see [Section 9: Your Privacy Rights](#).

4. Sharing Your Information

We do not sell or rent your personal information to third parties. We may share your information in the following circumstances:

With Your University or Employer

As your university or employer is the data controller for your educational/work data, they have access to your data within the Service.

Service Providers

We use trusted third-party service providers to help us operate our Service (such as cloud hosting providers). These providers process data only on our instructions and are contractually bound to protect your data.

Legal Obligations

We may disclose your data if required by law, such as to comply with a legal or regulatory request, or to protect the rights, property, or safety of MyKnowledgeMap or others.

With Your Consent

We will share your information for other purposes only if you provide explicit consent.

5. Sub-Processors

We use trusted third-party service providers (sub-processors) to help us deliver the Service. These providers process data only on our instructions and are contractually bound to protect your data.

Sub-Processor	Purpose	Data Processed	Location
Microsoft Azure	Cloud hosting and infrastructure	All platform data	Regional (customer choice)
Microsoft Entra ID (B2C)	Authentication and identity management	Login credentials, identifiers	Regional (customer choice)
Microsoft Email Services	System notification emails	Email addresses, notification content	Regional
SendGrid	Transactional email delivery	Email addresses, message content	EU/US (with safeguards)
MailGun	Transactional email delivery	Email addresses, message content	UK

We maintain contracts with all sub-processors that include data protection obligations equivalent to those in our agreements with customers.

Note: For a complete list of sub-processors and their security certifications, please contact us or request our Technical Overview Document.

6. Data Location and International Transfers

6.1 Regional Data Residency

We operate a regional data residency model. Your data is stored and processed entirely within the geographic region where your university or employer's instance is hosted. **Data does not transfer between regions.**

We operate data centres in the following locations:

Region	Data Centre Location	Applicable Customers
United Kingdom	UK South (London)	UK institutions
United States	East US	US institutions
Australia	Australia Southeast (Melbourne)	Australian institutions
Asia	Southeast Asia (Singapore)	Asian institutions
Middle East	UAE North (Dubai)	Middle Eastern institutions

All platform components - including application servers, databases, file storage, authentication services, logging, and backups - remain within your designated region.

6.2 For UK and EU Users

If your institution is hosted in our UK South data centre, your personal data remains within the United Kingdom and is not transferred internationally. The UK has adequate data protection laws, and no additional safeguards are required.

6.3 Microsoft as Sub-Processor

Our infrastructure is hosted on Microsoft Azure. Microsoft acts as a sub-processor and is contractually bound to process data only within the designated region. Microsoft's data protection commitments are documented in their [Data Protection Addendum](#) and compliance with UK GDPR is detailed in their [Trust Center](#).

6.4 Staff Access

MyKnowledgeMap staff may access data for support and maintenance purposes. Our team is structured to align with regional data residency:

- **UK-based staff** provide support for UK, US, Asian, and Middle Eastern customers
- **Australia-based staff** provide support primarily for Australian customers

Staff access data only within the regions they support. In exceptional circumstances (such as escalations or out-of-hours support), staff may access data in other regions. All staff are bound by strict confidentiality obligations, data protection training, and contractual terms that ensure equivalent protection regardless of location.

Both the United Kingdom and Australia have adequate data protection frameworks recognised for the protection of personal data.

7. Data Security

We implement industry-standard security measures to protect your personal data from unauthorised access, disclosure, alteration, or destruction.

7.1 Security Certifications

- **MyKnowledgeMap:** Cyber Essentials Plus certified
- **Microsoft Azure** (our hosting provider): ISO 27001 and SOC 2 Type 2 compliant

7.2 Technical Measures

- **Encryption in transit:** TLS 1.2 with RSA 2048-bit certificates
- **Encryption at rest:** Azure Transparent Data Encryption (TDE) for databases; AES-256 for backups
- **Access controls:** Role-based access control (RBAC) and multi-factor authentication (MFA)
- **Monitoring:** 24/7 security monitoring via Azure Security Center
- **Vulnerability management:** Regular security audits, penetration testing, and vulnerability assessments

7.3 Organisational Measures

- All staff complete mandatory security and data protection training
- Staff are bound by confidentiality obligations
- Access to customer data is limited to personnel with an operational need
- Clean desk and clean screen policies enforced

7.4 Breach Notification

Breach Response: In the event of a personal data breach affecting your data, we will notify your university or employer (as the data controller) **within one hour** of confirming the breach. We will provide updates as the investigation progresses and support any required regulatory reporting.

For further technical details on our security practices, please refer to our Technical Overview Document, available on request to customers.

8. Data Retention

We retain personal information only for as long as necessary to fulfil the purposes outlined in this Privacy Policy:

Data Type	Retention Period	Determined By
Educational/work data	As defined by your university or employer's retention policies	University/Employer (as data controller)
User account records	Until deletion is instructed by your university or employer	University/Employer (as data controller)
Application monitoring logs	90 days	MyKnowledgeMap
Google Analytics data (MyShowcase.me only)	14 months	MyKnowledgeMap
Security logs	90 days	MyKnowledgeMap

8.1 Educational and Account Data

Your university or employer is the data controller for your educational data and account information. They determine how long this data is retained based on their own policies, legal obligations, and regulatory requirements (such as education sector record-keeping rules).

Note: If you wish to request deletion of this data, please contact your university or employer directly. They will instruct us to delete your data if appropriate. We cannot delete data controlled by your university or employer without their authorisation.

8.2 Data Controlled by MyKnowledgeMap

For analytics and security data that we control, we retain this only for the periods specified above. Once no longer needed, we securely delete or anonymise it. You may request deletion of this data by contacting us directly.

For further technical details on our data retention and security practices, please refer to our Technical Overview Document, available on request to customers.

9. Your Privacy Rights

Depending on your location, you may have certain rights regarding your personal information under the UK GDPR or EU GDPR:

Right	Description
Access	Request access to the personal information we hold about you
Correction	Request correction of inaccurate or incomplete data
Deletion	Request deletion of your personal information under certain conditions
Data Portability	Request a copy of your data in a machine-readable format
Restriction	Request that we restrict processing of your data in certain circumstances
Object	Object to processing based on legitimate interests
Withdraw Consent	Where processing is based on consent, withdraw that consent at any time

9.1 How to Exercise Your Rights

For data controlled by your university or employer (educational/work data):

Please contact your university or employer directly, as they are the data controller.

For data controlled by MyKnowledgeMap (analytics, security data):

Contact us at info@myknowledgemap.com. Please state your university or employer so we can locate your records.

We will respond to valid requests within one month.

9.2 Right to Complain

If you are unsatisfied with how we handle your data, you have the right to lodge a complaint with the UK Information Commissioner's Office:

- Website: ico.org.uk
- Telephone: 0303 123 1113

- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Cookies

10.1 What Are Cookies?

Cookies are small text files stored on your computer or mobile device by a website's server. Each cookie is unique to your web browser and contains information such as a unique identifier and the website's domain name.

10.2 Types of Cookies We Use

Essential Cookies

These are necessary for our Service to function properly. Without these cookies, you would not be able to log in or use core features.

Cookie	Purpose	Duration
ASPX_AUTH_RMA	Authentication - keeps you logged in	Session
ARRAffinity	Load balancing - ensures consistent server connection	Session

Analytics Cookies

These cookies help us understand how users interact with our Service so we can improve it. **MyKnowledgeMap is the data controller for data collected by these cookies.**

Cookie	Purpose	Duration	Applicable Products	Provider
_ga	Google Analytics - tracks page views and user journeys	14 months	MyShowcase.me only	Google
ai*	Application Insights - monitors performance and errors	Session	All products	Microsoft

Note: Google Analytics is only used on MyShowcase.me. MyProgress does not use Google Analytics.

You can opt out of Google Analytics by installing the [Google Analytics Opt-out Browser Add-on](#).

Third-Party Cookies

These cookies are set by third-party services we have integrated into our platform. **MyKnowledgeMap is responsible for the decision to integrate these services**, but the third parties have their own privacy policies governing the data they collect.

Cookie	Purpose	Applicable Products	Provider	Privacy Policy
ShareThis	Allows students to share their content to social media and other services	MyShowcase.me only	ShareThis	sharethis.com/privacy
Microsoft B2C	Authentication service	All products	Microsoft	Azure AD B2C Cookie Definitions

Note: ShareThis cookies are only present when using MyShowcase.me. MyProgress does not include social sharing functionality.

10.3 Managing Cookies

You can control cookies through your browser settings. Note that disabling essential cookies will prevent you from using the Service.

- [Chrome cookie settings](#)
- [Firefox cookie settings](#)
- [Safari cookie settings](#)
- [Edge cookie settings](#)

11. Children's Privacy

Our Service is not intended for use by individuals under the age of 16. We do not knowingly collect personal data from children. If we learn that we have collected such data, we will take steps to delete it promptly.

If you believe a child under 16 has provided us with personal data, please contact us at info@myknowledgemap.com.

12. Changes to This Policy

We may update this Privacy Policy from time to time. Any changes will be posted on this page with an updated "Effective Date."

For significant changes, we will notify users via email or a prominent notice within the Service.

We encourage you to review this policy periodically.

13. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at:

MyKnowledgeMap Limited

Email: info@myknowledgemap.com

Address: Kings House, 12 King Street, York, YO1 9WP, United Kingdom

Company Registration: 03954387 ([Companies House](#))

Data Protection Officer

Craig Willis, Chief Technology Officer

Email: Craig.Willis@myknowledgemap.com

Security Incident Reporting

To report a security concern or suspected data breach:

Email: Craig.Willis@myknowledgemap.com

Telephone: 01904 659 465

Summary of Data Roles

Data Category	Data Controller	MyKnowledgeMap's Role
Learner/employee identity data	University/Employer	Processor
Educational content and assessments	University/Employer	Processor
Progress and completion records	University/Employer	Processor
Authentication (login sessions)	University/Employer	Processor
Platform analytics	MyKnowledgeMap	Controller
Security monitoring	MyKnowledgeMap	Controller
Third-party integrations (ShareThis)	MyKnowledgeMap	Controller

By using MyProgress, MyShowcase.me, or OpenBadges.me, you acknowledge that you have read and understood this Privacy Policy.