



The Institute of Ismaili Studies

IIS Digital Curriculum (IISDC) Privacy Policy (Updated on 12 Apr 2022)

By subscribing to and using the IIS Digital Curriculum (IISDC) Platform, you are accepting the policies described in this Privacy Policy. This privacy policy constitutes an integral part of the Terms of Use of the IISDC Platform.

1. Introduction

- 1.1 The IISDC Platform (also referred here as “the Platform”) is a subscription-based digital service that provides in digital form curriculum materials developed by the Institute of Ismaili Studies for the Ismaili community and published by Islamic Publications Limited. These materials consist of textbooks, teachers and parents guides, activity books, posters, picture cards, and other resources (also referred here as “contents”) for use by subscribers to the platform.
- 1.1 Any reference to the term “the IISDC Platform” in the Terms of Use and the Privacy Policy includes the use of the authorised Online (Kitaboo) Reader and offline Windows, MacOS, Android and iOS apps used for accessing the IIS Digital Curriculum.
- 1.2 The IISDC Privacy Policy also applies to the IISDC Registration Systems, consisting of the IISDC Registration Web App (RWA) and IISDC Access Code Cards (ACC), used for registration and subscription purposes.
- 1.3 The IIS Digital Curriculum (IISDC) Platform is owned and operated by Islamic Publications Limited, the publishing arm of the Institute of Ismaili Studies (also referred to here as “IPL”, “IIS”, “The Institute”, “we”, or “us”). We are a company registered in England and Wales under company number 01516365 and have our registered office at 10 Handyside Street, London, United Kingdom, N1C 4DN.
- 1.4 This Privacy Policy relates to information which is obtained by Islamic Publications Limited (IPL) and for which IPL is the Data Controller.
- 1.5 We take your privacy very seriously and promise to take great care of your personal data. We commit to protecting any personal information we obtain about you. This notice describes the IPL Privacy Policy as it relates to the IISDC Platform (also referred here as “the Platform”) and the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
- 1.6 Any personal data that we collect from you, or that you provide to us, will be processed by us in compliance with the UK Data Protection Act 2018, also referred to as “UK General Data Protection Regulation” (“GDPR”).
- 1.7 This policy provides you with the necessary information regarding your rights and our obligations.
- 1.8 By subscribing to and using the IISDC Platform, using any of the services linked to the platform, or providing us with any of your personal data, you are accepting the policies described in this Privacy Policy. If you do not agree with this Privacy Policy, you should not use the IISDC Platform.
- 1.9 We may revise this privacy policy from time to time. We will post any changes here, so please check back periodically. This policy is effective from 15 November 2021.

2. Registration for subscription

- 2.1 To set up your IISDC subscription, IPL will collect and process your personal information (i.e. your first and last names, and email ID) through authorised IISDC Registration Administrators. In addition, the country in which you are registering and the validity of your subscription period will be automatically linked to your subscription.
- 2.2 The above personal information is essential for us to collect from you to provide you access to the IISDC Platform. IPL will not collect any unnecessary personal data from you.
- 2.3 IPL may use the services of third parties or organisations to enable you to register and subscribe to the platform.

3. Collection of other data

- 3.1 The following additional data will also be collected when you use the IISDC Platform:
 - 3.1.1 *Log Data*: our servers automatically collect information when you access or use the Platform. This data is recorded in log files. Examples of such data include IP Address, and date and time of access.
 - 3.1.2 *Contact Us Data*: when you contact us regarding matters related to your subscription, we collect and store this data to communicate with you and respond to your enquiry.
 - 3.1.3 *Google Analytics Data*: this includes data related to your downloads of e-books on the Platform, user location, device type, and what features of the e-book *Reader* you are using.
 - 3.1.4 *Device-specific Data*: such as your hardware model, operating system version, unique device identifiers, and mobile network information.
 - 3.1.5 *User Feedback and Survey Data*: occasionally we may ask users to complete feedback forms and surveys with the aim of improving the IISDC Platform. If you choose to respond, we will collect, save and process your responses. The collated data and reports will maintain the anonymity of individual users.
- 3.2 We will not seek to link the above information to your name and other identifying details.

4. Using your information and justification of its use

- 4.1 Use of personal information under the UK GDPR must be justified under one of a number of legal “grounds”, and we are required to set out the grounds in respect of each use in this policy. These are the principal grounds that justify our use of your information:
 - *Consent*: where you have consented to our use of your information (you are providing explicit, informed, freely given consent, in relation to any such use and may withdraw your consent in the circumstance detailed below by notifying us);
 - *Contract performance*: where your information is necessary to enter into or perform our contract with you;
 - *Legal obligation*: where we need to use your information to comply with our legal obligations;
 - *Vital interests*: where we need to use your information to protect your vital interests;
 - *Legitimate interests*: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights; and
 - *Legal claims*: where your information is necessary for us to defend, prosecute or make a claim against you or a third party.
- 4.2 You have consented for us to use and hold your personal data and we do so in the following ways:
 - to provide you with access to our services and any other information which you request from us (consent);
 - to ensure you receive information relevant to you (consent);
 - to ensure the content on the IISDC Platform is presented in the most effective manner for you and your computer or mobile device (legitimate interests);
 - to administer the Platform for internal operations, including research, data analysis and data statistics (legitimate interest);

- to notify you about changes to our services (legitimate interest);
- We do not sell your personal data (or any other data you provide to us) to third parties. We will not disclose or share your personal data without your consent. (See exceptions below.)

5. Disclosure of your information

- 5.1 We may disclose your personal information to organisations that work with us in registering you for accessing the Platform, and for providing and improving the IISDC Platform and associated services.
- 5.2 We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of IPL, the IIS, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.
- 5.3 We may disclose your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with proceedings or investigations anywhere in the world where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime (use justification: legal obligation, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)).

6. Where we store your personal information

- 6.1 Personal information provided through the IISDC Platform is stored in the United Kingdom on a cloud-based database. Access to the database is limited to designated IIS and IISDC Registration Administrators and our contracted third-party development company and service provider.
- 6.2 The data can only be accessed through a secure firewall by designated administrators with a username and password, and who have been given access to the database.
- 6.3 No data transmission over the internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

7. How long we retain your personal data

- 7.1 We will hold your information for as long as is necessary in order to provide you with the IISDC Platform services, deal with any specific issues that may arise, or otherwise as is required by law or any relevant regulatory body.
- 7.2 Some personal data may need to be retained for longer than this to ensure that IPL can comply with applicable laws and internal compliance procedures, including retaining your email address for communication purposes.
- 7.3 If information is used for two purposes, we will retain it until the purpose with the latest period expires but we will stop using it for the purpose with a shorter period when that period expires.
- 7.4 We restrict access to your personal information to those persons or parties who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.

8. Your rights

- 8.1 Under the UK GDPR, you have various rights in relation to your personal data.
- 8.2 All of these rights can be exercised by contacting us at IISDCSupport@iis.ac.uk
- 8.3 You have the following rights in relation to your personal data:
 - We will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information

that you have provided to us by sending us a request to rectify your personal data where you believe the personal data we have is inaccurate or incomplete;

- To ask us to delete all of your personal data. Doing so will result in IPL deleting your personal data without undue delay (unless there is a legitimate and legal reason why IPL is unable to delete certain of your personal data, in which case we will inform you of this in writing);
- To ask us to stop processing your personal data at any time;
- To request that IPL provides you with a copy of all of your personal data and to transmit your personal data to another data controller in a structured, commonly used and machine-readable format, where it is technically feasible for us to do so; and
- To lodge a complaint to a supervisory authority such as the Information Commissioner's Office in the UK (see www.ico.org.uk), although we encourage you to engage with us in the event you have any concerns or complaints.

8.4 IPL will not ordinarily charge you in respect of any requests we receive to exercise any of your rights detailed above; however, if you make excessive, repetitive or manifestly unfounded requests, we may charge you an administration fee in order to process such requests or refuse to act on such requests. Where we are required to provide a copy of the personal data undergoing processing, this will be free of charge; however, any further copies requested may be subject to reasonable fees based on administrative costs.

8.5 Asking us to stop processing your personal data or deleting your personal data will likely mean that you are no longer able to use the IISDC Platform.

8.6 Where you request IPL to rectify or erase your personal data or restrict any processing of such personal data, IPL may notify third parties to whom such personal data has been disclosed of such request. However, such third parties may have the right to retain and continue to process such personal data in its own right or on other lawful grounds without your consent.

9. Changes to this policy

Any changes we make to our Privacy Policy in the future will be posted on this document and where appropriate, notified to you by email.

10. Contact

Questions, comments and requests regarding this Privacy Policy are welcome. Please call our office on 44 (0) 20 7756 2700, email us at IISDCSupport@iis.ac.uk, or write to us at:

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