Data Privacy and Security FAQs

1 September 2025

At 3P Learning we build better ways to learn. We understand the trust placed by our customers in how we administer personal information. Our learning resources and programs collect, process and operate with personal information in accordance with our Privacy Policy and these Data Privacy and Security FAQs.

Our learning programs for Home customers

Our learning programs for Schools

All our programs are owned and operated by 3P Learning companies.

1. Who are the 3P Learning companies that process personal information?

All the following companies are part of the 3P Learning group of companies:

Product Licensor / Owner

Mathletics, Writing Legends, Storyathon	3P Learning Limited	(Australia)
Reading Eggs, MathSeeds, Wordflyers	Blake eLearning Pty Ltd	(Australia)
LiteracyPlanet	Intrepica Pty Ltd	(Australia)
Brightpath Progress	Pairwise Pty Ltd	(Australia)
Distributor	3P Learning Australia Pty Ltd	(Australia)
	3P Learning UK Limited	(UK)
	3P Learning Inc	(US)
	3P Learning Canada Limited	(Canada)
	3P Learning NZ Limited	(New Zealand)

2. Is your head office in Australia?

Yes, our head office is in Australia.

3. Do you hold ICO Registration in the UK?

Yes, 3P Learning UK Limited holds ICO Registration Z2188515.

📞 1300 850 331 | 📠 1300 762 165
✉ customerservice@3plearning.com.au
🏠 **Registered Office:** 655 Parramatta Road, Leichhardt, NSW 2040
🌐 www.3plearning.com

3P Learning

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4. Does 3P Learning adhere to UK GDPR or EU GDPR Standard Contractual Clauses?

Yes, we do. Our programs and resources for School customers in the UK and EU are provided by 3P Learning UK Limited (located in the UK) and 3P Learning Limited (located in Australia). The services are provided under standard contractual clauses.

5. When providing support where are 3P support staff accessing personal data from?

We provide regional support from our locations in Australia, New Zealand, United Kingdom, Canada and United States. If needed, certain enquiries containing personal data may be referred to our team in Australia.

Brightpath Progress:

This assessment program is available for school subscriptions only. The processing of data in the program (including personal data) is also predominantly supported by staff located in Australia.

6. How do you collect personal information?

Account subscription holder	We collect the teacher or parent account holder personal information directly from the school or parent, as applicable.
Program Users (includes student data)	To create the user account we collect the student, parent and teacher personal information from the School or Parent. The account holder enter the user names (which can be pseudonyms). The program enables user grade levels and activities to be entered by the teacher/parent and students.

7. What is the purpose of collection and processing of personal information?

Purpose for collection	
Account administration (teacher and parent data)	**Deliver our Learning Programs (teacher and student data)**
The personal information is used to administer the subscription and program features or respond to questions and enquiries. We may also send newsletters and marketing if we are permitted to.	The personal information is used to administer learning program features. For students these include learning activities, certificates, and leaderboard rankings. For parents/teachers, features can include student results and progress, and class and school data, if enabled.

8. What types of personally identifiable information do you collect and process?

Types of personal information collected	
Account subscription holder (Parent and teacher)	**Program users**
Subscriptions (Account holder): From the school or parent we collect and process: - Name - School (if applicable) - Country - Student name/s - contact details (phone, address, email) For teaching and administration users, additional contact details including email and address is also used.	**Program Users (includes students):** We collect and process: - Name or initials, - School (if appliable) - Country - Grade, Year Level - Age [1] - Audio recording [2] **[1] (Assessment program) only** **Brightpath Progress:** Age Student's data may include data of birth for program data given to the teacher and school. **Program account features** **[2] Reading Eggs only:** Audio recording In a school subscription, a teacher may create a Read Aloud activity which agrees that a recording of student audio is created for the teacher to assess reading fluency. Audio files can be deleted at any time by the teacher and are automatically deleted after 24 months if not earlier. **Free-text student exercises:** Our learning activities do not require further personal information. However, certain learning activities allow a free-text response to be entered. For example: filling in letters or words, writing a book review, or other literacy exercises. We only process student activity for an educational purpose. **Class rosters:** Schools may provide personal information to us via third parties (like class rostering programs). If the School authorises and engages services of these intermediaries, we will process information on the School's instructions with these third parties.
Does 3P engage third party services or technologies that process personal information? Our program may share personal information with third parties to administer the subscription, support the delivery of the learning program and review data in our App and program performance.	

Account subscription holder (Parent and teacher)	Program users (teachers and student data)
Purpose of our sub-processes In order to respond to customer enquiries, for account administration and for customer communications, the parent or teacher contact and subscription details are supported by our subprocesses to deliver our customer experience. This may include sending newsletters and information with customers that we consider to be of legitimate interest to you and in connection with the educational purpose.	**Purpose of our sub-processors** Our learning programs are proudly developed by our 3P Learning team. When a teacher or student logs into our learning programs, their Student and Teacher personal information is processed by 3P Learning group companies for the educational purpose. Our program data is hosted in Microsoft Azure and Amazon Web Services, and maintained to meet security standards that are kept under review. Our team also review the performance of the learning program using third party technologies that do not store personal information.

We review the services and technologies for their data processing terms. This is to ensure we can minimize the collection of personal information in our processing, and enable personal information to be deleted on request or our data retention policies. Our subprocesses are listed here and updated form time to time.

Our sub-processors

Account subscription holder	Program Users
Customer management, CRM • 8x8　　　　(US/UK/Singapore/Global) • Freshworks　(US/Global) • Gong.io　　(US) • Mailchimp　(US/Global) • Salesforce　(AUS) • Zoho　　　(US/Global) • Zoom Voice　(US)(EU)(AU) • Ortto　　(AU) – *Literacy Planet only* **(Parent/Teacher) User Guidance** • Hotjar　　(EU) • Userpilot　(US) • VWO　　(US/Global) • Walkme　(US/Global) • Ortto　(AUS) – *Literacy Planet only* **Class Rosters (Schools)** On the request from schools: • Classlink　(US)(EU) • Clever　　(US) • Wonde　　(UK)	Personal information is used processed by 3P Learning to administer access, activities and program features for the users only **Class Rosters (Schools)** Schools may administer their subscriptions with and alongside services from third parties (like class rostering programs). Where these are requested or engaged by the school, we may enable our subscription to be administered with these services selected by the School. On the request from schools, we may receive student/class information from: • Classlink　(US)(EU) • Clever　　(US) • Wonde　　(UK)

General applications: Microsoft (US/Global), Netsuite (Aus)	
Website technologies We use web analytic tools on our website such as google analytics or LinkedIn, that may use cookies or process data (IP address or other identifier data) subject to user device settings. These are for our websites to review functionality, user experience and analysis if how our websites are engaged. Cookie consents can be withdrawn by users. Privacy choices can be administered in your web browser. **Parent Subscription (Home subscriptions)** Our programs may also be accessed on devices from Google Play and the App Store. Payments by credit card are administered by: • Chargebee (US, Global) • Eway (Australia)	**Website technologies (our programs)** We may use third party web analytic tools on our website from time to time to review the performance and operations of our programs. The processes applied are reviewed to process identify device activity rather that personally identifiable information, and are not used for any marketing or other purposes. Website technologies using limited processing of information can also apply (e.g. device identifiers for successful login) to assist program performance and function. These technologies that help us with this may include Google Analytics (US) and Posthog (US, EU).
Communities of practice We may participate or host events or communities of practice via third party platforms. These platforms may require teachers or parents to apply a user login or guest login and agree to the third party user terms, as applicable.	

9. Where is personal data in our learning programs hosted?

Our program is online and data is stored in the cloud. We have entered into agreements and use Microsoft Azure and Amazon Web Services (AWS) for data hosting and storage as follows:

Reading Eggs, Mathseeds, Wordflyers, Writing Legends Live data: USA (AWS) Back up: Australia (AWS)	**Mathletics** Live data: USA (Microsoft Azure) Back up: West Europe (Microsoft Azure)
Brightpath Progress Literacy Planet Live data: Australia (AWS) Back up: Australia (AWS)	**Writing Legends, Storyathon** Live data: Australia and USA (Microsoft Azure) Back up: West Europe (Microsoft Azure)

We periodically review updates and the nature of the compliance certifications held by Microsoft Azure and AWS.

10. What physical access controls are in place at the locations from which data may be stored?

Data is stored online via Microsoft Azure and Amazon AWS Data Centres are all subject to ISO27001 certification, and equivalent physical access control requirements.

Data is accessed by 3P Learning employees at any location are on devices or programs that a subject to security standards. Based on the location of the device, we are able to disable access to the device, or certain applications.

11. Is the data contained within your e-learning program encrypted in transit?

Yes	Mathletics	AES-256 or higher
Yes	Literacy Planet	SHA-256
Yes	Reading Eggs, Mathseeds and other programs	AES-256 or higher

12. Do you engage third party services to develop the learning program

No, we don't engage third parties to develop our learning programs. Our programs are developed and monitored by our team at 3P Learning.

13. Does 3P Learning share personal information with third parties?

No. We do not share personal information data with third parties unless we receive consent. At the time of subscription the consent is limited to the processes set out in our Privacy Policy or as required by law. The School or parent account administrator can administer how user information, including student information and their own information, is held by 3P Learning. This includes any requests for deletion.

3P Learning may retain and use anonymous and aggregated information for performance reporting, benchmarking and analytic purposes, and for product and service improvement.

14. Can parents access education records from 3P Learning?

Our learning programs can create limited 'education records' for a school that holds a school subscription. This data is used by 3P Learning to provide Schools and teachers with the features or our learning programs, resources or services and for an education purpose only. 3P Learning will respond to requests from any parent or guardian with the right to access education records subject to law.

3P Learning may require personal information from the parent or guardian to administer these requests. Parents or guardians can contact us at privacy@3plearning.com.

15. Does 3P Learning share or sell information to advertisers?

No. We do not sell data to advertisers (whether personal, anonymous or aggregated).
We collect and process personal information to administer our programs and for an educational purpose.

16. How long do you retain data for?

Data that contains personally identifiable information is retained for a reasonable time after the subscription, and after that we permanently anonymise records to remove personal information. Back up data policies may apply and that data is generally inaccessible. We promptly process the request for personal information to be removed, users can email us at privacy@3plearning.com.

17. Does the solution provide unique usernames and passwords for end users?

Yes

18. Does your solution include access controls to ensure only your authorised staff have access to the data? What access controls are in place?

Yes, via role-based access control (RBAC) at 3P Learning.

19. Do you regularly conduct reviews of user access levels?

Yes, user access is routinely checked.

20. How frequently do you conduct vulnerability & penetration testing?

Every 6-12 months

21. Do you regularly review audit logs?

Yes

22. Do you conduct regular training for all staff in relation to privacy and security requirements at 3P Learning?

Yes

23. Do you conduct investigations into security breaches and implement remediation strategies?

Yes. We review suspected or actual security incidents for data security improvements. We also apply data penetration tests to review potential security risks. Breaches or serious incidents (which are not breaches) are reviewed for remediation strategies and actions by our Incident Response Team.

24. Do you notify your customers of any security breaches?

Yes, we would seek to inform any impacted customers promptly or at the same time of notification to any authorities upon becoming aware of any security breaches.

25. What is the SLA for the availability of the Solution?

At least 99.9% uptime

26. How can you contact 3P Learning for support?

To contact us about our Data Privacy and Security FAQs please email privacy@3plearning.com.
For other enquiries, we can be contacted at:

Australia and Asia Pacific	Customerservice@3plearning.asia
Canada, US and across the Americas	Customerservice@3plearning.ca
	For US customers: Support.use@3plearning.com
UK, Europe, Africa and the Middle East	Registrations@3plearning.co.uk