PRIVACY NOTICE

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Thank you for choosing to be part of our community at **ICM Econominds Ltd**, trading as **OmniMinds**, **Econominds** and **Mathominds** ("**Company**", "**we**", "**us**", "**our**"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at hello@omniminds.co.uk.

When you visit our websites www.omniminds.co.uk and www.econominds.co.uk, use our learning platform at app.econominds.co.uk (together, the "**Website**"), or use any of our services, including our courses, our 1:1 tutoring and any related services, sales, marketing or events (the "**Services**"), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it — including how we use artificial intelligence ("**AI**") — and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.

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1. WHAT INFORMATION DO WE COLLECT?

In short: *We collect personal information that you provide to us, and information generated as you learn on our platform.*

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services, participate in activities on the Website, book a discovery call, take our fit quiz, or otherwise contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

Personal information provided by you. We collect names; email addresses; usernames; passwords; debit/credit card numbers; billing addresses; phone numbers; your age or year group; the exam board and qualification you are studying; and other similar information.

Learning and performance data. Because we provide an educational service, we also collect the work you submit and the data generated as you study, including: answers to practice and exam-style questions; essays and chains of analysis submitted for marking; homework submissions and the time they are submitted; scores, marks and feedback (including your Econominds Working Grade and course progress data); attendance and participation in live sessions (including whether your camera is on and the questions you ask and answer), absence notifications you send to your tutor, and whether you watch session recordings; timed practice paper, mock examination and predicted paper results; and how you use the platform (topics studied, time spent, activity levels). This information is used to run the Services described in Sections 2 and 3, including AI-assisted marking and personalised study plans.

Live session recordings. Our live group sessions are recorded so that students who are unavoidably absent can catch up. Students are asked to attend with their camera on, so a student's image, voice and contributions may appear in a recording. Recordings are made available only to students enrolled on the relevant course and are handled in line with this notice. We keep live session and 1:1 tutoring recordings for up to 2 years from the date of the session and then delete them, unless a safeguarding concern or legal claim requires us to keep a recording for longer.

A/A* Guarantee records. If you join a course covered by our A/A* Guarantee, we keep the A/A* Guarantee acknowledgement signed by the student and parent, your enrolment date, the records we use to track each guarantee commitment, the weekly progress reports we send, and any cancellation request or guarantee claim you make, including the official exam results you send us.

Payment data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Stripe. You may find their privacy notice here: https://stripe.com/gb/privacy.

Social media login data. We may provide you with the option to register with us using your existing social media account details, like your Facebook, X (Twitter) or other social media account. If you choose to register in this way, we will collect the information described in the section called "How do we handle your social logins" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

2. HOW DO WE USE YOUR INFORMATION?

In short: *We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To deliver and facilitate delivery of Services to you.** We may use your information to provide you with the requested Services, including marking your work, tracking your progress and building your personalised study plan (see Section 3). *(Performance of a contract)*
- **To run our A/A* Guarantee and 7-day money back guarantee.** We use your learning and performance data, live session records and A/A* Guarantee records to track each guarantee commitment, to produce the weekly progress report shared with the student and their linked parent, and to assess any cancellation request under the 7-day money back guarantee or any claim under the A/A* Guarantee. A member of

our team makes the final decision on any refund (see Section 3). Cancellations and claims should be sent to hello@omniminds.co.uk. *(Performance of a contract)*

- **To facilitate account creation and the logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and the logon process for the performance of the contract. *(Performance of a contract)*
- **To manage user accounts.** We may use your information for the purposes of managing your account and keeping it in working order. *(Performance of a contract)*
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions and policies. *(Performance of a contract / legitimate interests)*
- **To fulfil and manage your orders.** We may use your information to fulfil and manage your orders, payments, returns and exchanges made through the Website. *(Performance of a contract)*
- **To post testimonials.** We post testimonials on our Website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update or delete your testimonial, please contact us at hello@omniminds.co.uk and be sure to include your name, testimonial location and contact information. *(Consent)*
- **To request feedback.** We may use your information to request feedback and to contact you about your use of our Website. *(Legitimate interests)*
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user's consent. *(Consent)*
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention). *(Legitimate interests / legal obligations)*
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond. *(Legal obligations)*
- **Administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions. *(Performance of a contract / consent)*
- **To respond to user inquiries / offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services. *(Performance of a contract / legitimate interests)*
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our

marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time (see "What are your privacy rights" below). *(Consent / legitimate interests)*

- **Deliver targeted advertising to you.** We may use your information to develop and display personalised content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness. *(Consent / legitimate interests)*
- **To improve our Services.** We may use your information for data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, products, marketing and your experience. Wherever possible we use this information in aggregated and anonymised form so that it is not associated with individual users. *(Legitimate interests)*

3. HOW DO WE USE ARTIFICIAL INTELLIGENCE (AI) AND AUTOMATED DECISION-MAKING?

In short: *We use AI to mark your work, give you feedback and personalise your study plan. A human always reviews any decision that has a significant effect on you — such as guarantee eligibility, refunds or admission to tutoring — and you have the right to ask for a human review of any AI output.*

What our AI does

Our platform uses AI systems, including machine learning models provided by trusted third-party AI providers, to:

- mark and score your answers, essays and chains of analysis, and give you instant feedback;
- calculate progress metrics such as your Econominds Working Grade;
- identify the topics where you are losing marks and build and update your personalised study plan; and
- generate practice content and worked feedback tailored to your exam board.

To do this, we process the learning and performance data described in Section 1. Our lawful bases are performance of our contract with you (delivering the marking and personalisation you have signed up for) and our legitimate interests (improving the accuracy and quality of our Services).

Human oversight and automated decisions

AI-generated marks, scores and study plans are indicative learning tools. We do not make solely automated decisions that produce legal effects or similarly significant effects for you. In particular, a qualified member of our team always reviews and makes the final decision on: eligibility for our money-back guarantee; refunds; admission to our 1:1 tutoring programme; scholarship decisions; and any suspension or termination of an account.

Under UK data protection law (UK GDPR, as amended by the Data (Use and Access) Act 2025), where any decision about you is based on automated processing and has a significant effect on you, you have the right to: be told that the decision has been made; obtain human intervention; make representations about the decision; and contest it. To exercise any of these rights, or to ask for a human review of any AI-generated mark, score or plan at any time, contact us at hello@omniminds.co.uk. We will respond within 30 days.

Fairness, bias and impact assessments

We are committed to using AI fairly and lawfully, including under the Equality Act 2010. We test and monitor our AI systems for accuracy and for bias — including checking that marking and personalisation do not produce unjustified differences in outcomes for students based on protected characteristics — and we correct issues we find. We carry out and maintain Data Protection Impact Assessments (DPIAs) and AI impact assessments for our AI systems, in line with UK GDPR Article 35 and ICO guidance on AI and data protection, and we review them when our AI systems materially change.

What our AI does not do

- We do not use emotion-recognition or biometric categorisation systems.
- We do not sell your personal information, or your child's, to anyone.
- Our third-party AI providers act as our data processors: they are contractually restricted to processing your data only on our instructions and are not permitted to use your personal data to train their own models.

Students in the EU

We welcome students resident in the European Union (including Spain). If you use our Services from the EU/EEA, the EU GDPR applies to our processing of your personal data, and you keep all of your rights under it, including the Article 22 rights regarding automated decision-making. Your personal data is transferred to and processed in the United Kingdom in reliance on the European Commission's adequacy decision for the UK.

The EU Artificial Intelligence Act (Regulation (EU) 2024/1689) also applies to AI systems used in education. We tell you when you are interacting with an AI system and when content or feedback is AI-generated, in line with the transparency requirements of that Act, and we

are preparing our education AI features against the requirements for high-risk AI systems ahead of the applicable EU deadlines. EU/EEA residents may complain to their local supervisory authority — for Spain, the Agencia Española de Protección de Datos (AEPD), www.aepd.es.

4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In short: *We only share information with your consent, to comply with laws, to provide you with Services, to protect your rights, or to fulfil business obligations.*

We may process or share your data that we hold based on the following legal bases:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital interests:** We may disclose your information where we believe it is necessary to investigate, prevent or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Service providers.** We share data with third-party vendors, service providers and agents who perform services for us and need access to the data to do that work. This includes our payment processor (Stripe), our hosting providers, and the third-party AI providers described in Section 3, who process student work solely on our instructions under data processing agreements. Where any provider processes data outside the UK, we put in place appropriate safeguards (such as the UK International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses).
- **Business transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **Other users.** When you share personal information (for example, by posting comments, contributions or other content to the Website) or otherwise interact with public areas of the Website, such personal information may be viewed by all users and may be publicly made available outside the Website in perpetuity. If you interact with other users of our Website and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Website, and view your profile.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In short: *We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

6. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In short: *If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.*

Our Website offers you the ability to register and log in using your third-party social media account details (like your Facebook or X logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture, as well as other information you choose to make public on such social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

In short: *We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us, plus any period needed to administer the A/A* Guarantee and the 7-day money back guarantee (we keep A/A* Guarantee records for 2 years after the end of the course, except where tax or accounting law requires financial records to be kept longer), resolve disputes and comply with legal obligations.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

In short: *We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will notify the ICO (and, where required, the relevant EU supervisory authority) within 72 hours of becoming aware of it, and we will inform affected users without undue delay where the breach is likely to result in a high risk to them.

9. HOW DO WE PROTECT CHILDREN'S INFORMATION?

In short: *Most of our students are under 18. We design our Services with their best interests in mind, in line with the ICO's Age Appropriate Design Code.*

Our Services are designed for A-Level students, most of whom are under 18. We take additional care with children's personal information:

- We follow the ICO's Age Appropriate Design Code (Children's Code), including its standards on data minimisation, transparency, profiling and the best interests of the child.
- Users under 16 must tell us their age by email to hello@omniminds.co.uk before enrolling in a course, so that we can handle their data in the way most appropriate for their age group. Users under 13 may only use the Services with the consent and involvement of a parent or guardian.
- Parents linked to a Student account can view and manage the Student's personal and billing data as described in our Terms and Conditions, and receive the Student's weekly progress report.
- Profiling of students (such as personalised study plans and progress scores) is used only to support their learning, is subject to the human-oversight measures in Section 3, and is covered by our Data Protection Impact Assessments.
- We do not use children's data for targeted advertising, and we do not sell children's data.

10. WHAT ARE YOUR PRIVACY RIGHTS?

In short: *You may review, change or terminate your account at any time, and you have rights over how your data is used.*

Under UK data protection law (and, if you are in the European Economic Area, EU data protection law), you have rights that allow you greater access to and control over your personal information. These include the right (i) to request access and obtain a copy of your personal information; (ii) to request rectification or erasure; (iii) to restrict or object to the processing of your personal information; (iv) to data portability; and (v) the rights relating to automated decision-making described in Section 3. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you believe we are unlawfully processing your personal information, you have the right to complain to the UK Information Commissioner's Office (ICO) at https://ico.org.uk/make-a-complaint/. If you are a resident in the European Economic Area, you can find the contact details of your local data protection supervisory authority here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. If you are a resident in Switzerland, the contact details for the data protection authorities are available here: https://www.edoeb.admin.ch/edoeb/en/home.html.

If you have questions or comments about your privacy rights, you may email us at hello@omniminds.co.uk.

Account information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing

You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt out, you may:

- Access your account settings and update your preferences.
- Contact us using the contact information provided.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been

finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

12. DO WE MAKE UPDATES TO THIS NOTICE?

In short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Last updated" date and the updated version will be effective as soon as it is accessible. We will also update this notice as the law on AI develops, including as further requirements of the EU AI Act become applicable and as UK AI regulation and ICO codes of practice are finalised. If we make material changes to this privacy notice — including material changes to how we use AI — we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at hello@omniminds.co.uk or by post to:

ICM Econominds Ltd (trading as OmniMinds)
Icentrum
Holt Street
Birmingham
B7 4BP
United Kingdom

14. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update or delete your personal information, please email hello@omniminds.co.uk. We will respond to your request within 30 days.