

Privacy policy – Magma Maths

for the website and the Magma Maths learning platform

Last updated: October 2026

1. Who we are and our role

This policy explains how Magma Maths handles personal data in the United Kingdom. It covers our website and the Magma Maths learning platform.

Magma Maths is provided by Radish Education UK Ltd, 1 Chapel Street, Warwick CV34 4HL, a company registered in England and Wales (Companies House number 16137150). We are registered with the Information Commissioner's Office under registration number ZB925941. Our parent company is Radish AB, Stockholm, Sweden.

Our role depends on whose data it is:

Whose data	Our role
Pupils and school staff using the platform	We are a processor. The school, trust or local authority is the controller: it decides that the platform is used, which data goes into it and for how long. We process that data only on its documented instructions, under a data processing agreement.
Website visitors, people who contact us, and our business contacts	We are the controller, and this policy fully describes what we do.

Because the school is the controller for platform data, it also has its own privacy notice covering its use of Magma Maths. If you are a pupil or a parent and want to use your rights, please contact the school first. We will help it respond.

2. What Magma Maths does and why we process data

Magma Maths is a mathematics teaching and assessment platform for schools. Teachers set assignments. Pupils solve problems and show their working by typing or writing by hand on a touch screen, or by uploading a photo of written work. The platform records that work, gives feedback, and shows progress to the teacher. It runs in a web browser and on iPad.

We process personal data only to:

- run user accounts and sign-in
- deliver lessons, assignments and feedback, including AI feedback where the school uses it
- show pupils' progress to their teachers
- keep the platform secure and working, and find and fix faults
- understand how features are used, so we can improve the platform
- give support to school staff
- run our website and handle enquiries and business relationships

We do not use platform data for advertising or marketing. We send marketing emails to teachers and school staff, for example at the start of the school year, only using contact details we hold ourselves, such as from a newsletter sign-up, a demo request or a customer contact. You can unsubscribe at any time using the link in every email. We do not sell or rent personal data.

3. The personal data we process

Who	What	Where it comes from
Pupils	Username, class and year group, and name where the school chooses to enter one. Answers and written working, handwriting, photos of	The school, the school's management information system if the school

Who	What	Where it comes from
	written work the pupil uploads, voice recordings and their transcripts if the pupil records an explanation, results and progress.	connects it, or the pupil using the platform
School staff	Name, work email address, school and classes, and feedback written to pupils	The school, its management information system, or the staff member
Everyone using the platform	Sign-in details (passwords are stored only as hashes), sign-in times, technical logs including IP address, browser and device information, error reports, and usage data about which features are used	Created automatically when the platform is used
People who contact support	Name, email address and the content of the conversation. Pupils cannot use the support chat.	The person contacting us
Website visitors	IP address and technical data needed to show the site. With consent: analytics and marketing data (section 5).	Created automatically
Business contacts	Name, work contact details, organisation and our correspondence	The person, or their organisation

Parents and carers. Where the school uses the parent platform, a teacher adds a parent's email address and the parent creates their own account. Parents can see their own child's assignments, work and progress, but cannot change anything. We process this data for the school, like all other platform data.

The platform is not designed to hold special category data, such as health, special educational needs and disabilities (SEND), safeguarding, ethnicity or religion. Schools should not enter this kind of information in free-text fields.

Handwriting is converted into mathematical expressions inside Magma Maths. We do not use handwriting to identify anyone, to confirm who someone is, or to build handwriting profiles.

4. Artificial intelligence

Magma Maths uses AI to give pupils formative feedback on their mathematical reasoning: comments on how they approached a problem, not marks or grades. The AI features are switched on by default. A school or trust can switch them off for all its users at any time.

Always true, whether or not AI is switched on:

- No decision about a pupil is made automatically. Teachers set, review and act on all work. The platform does not set grades, decide attainment levels or place pupils in sets. There is no automated decision-making within the meaning of Article 22 of the UK GDPR.
- Pupil work is never used for advertising or marketing, and is never sold or rented.

When AI is switched on:

- We use one AI provider, Google (Gemini), with processing in the EU (Germany).
- Before anything is sent, we remove names and email addresses. Text a pupil types in an answer is sent as written, so pupils should not type personal details into answers.
- Handwriting is converted into mathematical expressions before anything is sent. Images of handwriting are not sent.
- If a pupil uploads a photo of written work, the photo is sent so the work can be read. Pupils should not write their name on work they photograph.
- If a pupil records a spoken explanation, the recording is sent to Google (Gemini) to be turned into text. The recording and the text are saved with the pupil's answer, so the

teacher can listen to it and read it, and the text is used for AI feedback. Voice recording is on by default, and teachers can switch it off for their class. We do not use voice recordings to identify anyone.

- Our agreement with Google prohibits using this data to train AI models.
- We keep records of AI requests and responses for up to 90 days, to find faults and improve the feedback. They are then deleted automatically.

5. Cookies and similar technologies

In the platform we store information on your device that the platform needs to work: keeping you signed in, keeping the session secure, and remembering settings such as language. We also use product analytics to see which features are used and where problems occur, so we can improve the platform. The platform has no advertising and does not track you across other websites.

On our website we use cookies needed to show the site. With your consent, we also use cookies for analytics and marketing, for example to measure visits and the results of our campaigns. You choose in the cookie banner when you first visit.

6. Lawful bases

Platform data. The school, as controller, decides its own lawful basis. Schools normally rely on public task (Article 6(1)(e) UK GDPR), because teaching and assessing pupils is part of providing education. Consent is not the right basis here: a pupil cannot freely refuse to take part in lessons. We process this data under Article 28 UK GDPR, on the school's documented instructions.

Where we are the controller, we rely on:

Purpose	Lawful basis
Agreements with schools, and support for the people who use the platform	Performance of a contract, Article 6(1)(b)
Running and securing our website and systems, keeping support records, answering enquiries, business contacts	Legitimate interests, Article 6(1)(f). Our interest is a secure, working service and good relationships with schools. We have weighed this against your rights.
Website analytics and marketing cookies	Consent, Article 6(1)(a) UK GDPR and regulation 6 of the Privacy and Electronic Communications Regulations (PECR)
Records we must keep or disclose by law	Legal obligation, Article 6(1)(c)

Marketing emails rely on legitimate interests (Article 6(1)(f)). We send them to work email addresses, and every email has an unsubscribe link. Where we have asked for your consent, we rely on that instead, and you can withdraw it at any time.

7. Children

Most platform users are children. They use Magma Maths through their school, as part of lessons and under the school's responsibility. Pupil accounts are created by the school or through a class set up by a teacher. We do not use children's data for profiling or marketing.

8. Who receives personal data

We use service providers to run the platform and our business. Each is bound by a written contract (Article 28 UK GDPR) and may use the data only for the service it provides to us.

These include cloud hosting, our AI provider, customer support tools, sign-in and class-list services chosen by the school, product analytics and error monitoring, website and marketing tools, and companies in our group within the EU. Each one, with its location and the data it receives, is named in our subprocessor list.

We share data with authorities or courts only where the law requires it, or to establish or defend legal claims.

Our current list of subprocessors, with names and locations, is available on request at legal@magamath.com. We tell schools in advance before we add or replace a subprocessor, so they can object.

9. Where data is stored, and transfers outside the UK

Platform data, meaning everything pupils and teachers create in Magma Maths, is stored with Amazon Web Services in Frankfurt, Germany. AI processing also takes place in the EU (Germany). UK law treats the European Economic Area as providing adequate protection, so these transfers rely on the UK's adequacy regulations for the EEA.

Some of our service providers are based in the United States. This currently applies to:

- **Customer support.** When school staff contact us through the support chat, their name, email address and message are processed there.
- **Our website, only with your consent.** Some of the analytics and marketing tools you can accept in the cookie banner are run from the United States.

These transfers are based on the UK Extension to the EU-US Data Privacy Framework, or on the UK International Data Transfer Addendum to the EU standard contractual clauses. Schools that do not want the support transfer can switch off the support chat and contact us by email instead.

10. How long we keep data

Data	How long
Pupil and staff data in the platform	Deleted within 30 days after the account is removed or the agreement with the school ends. The school can ask for earlier deletion at any time, and we confirm deletion on request.
Backups	Encrypted. Deleted within 30 days after the agreement with the school ends.
Technical logs, including IP addresses	Up to 90 days, for security, fault-finding and preventing misuse, then deleted automatically
AI requests and responses	Up to 90 days, then deleted automatically
Support conversations	24 months after the last activity. Pupil information in a conversation is removed when the case is closed. Deleted within 30 days after the agreement with the school ends, or earlier if the school asks.
Website enquiries and business contacts	As long as we are in contact, then for up to 6 years as required for business and tax records

Marketing emails: we use your contact details until you unsubscribe. After that we keep only your email address on a suppression list, so that we do not email you again.

We do not keep pupil work beyond what our agreement with the school allows. If we ever need to keep it longer, we agree that with the school in advance. When an agreement ends, we return the school's data on request in a common, structured format, and then delete it.

11. Security

- Data is encrypted in transit (TLS 1.2 and 1.3) and at rest (AES-256). Passwords are stored only as hashes.
- Access is given by role, on a least-privilege basis. Administrative access requires multi-factor authentication. We review access every quarter.

- Each school's data is kept logically separate from other schools' data.
- Development, test and production systems are separate.
- We test the platform for vulnerabilities regularly, run a penetration test every year, and fix critical and high-risk findings within 15 days.
- Radish AB holds a SOC 2 Type 1 report, which schools can receive under a confidentiality agreement.
- We have an incident response plan. If a personal data breach affects a school's data, we tell the school within 24 hours of becoming aware of it, and immediately where a safeguarding concern is involved, and give it what it needs to meet its own obligations.
- Our recovery target after a major incident is 4 hours, with no more than 15 minutes of data loss.

12. Your rights

Under the UK GDPR you have the right to access your personal data, to have it corrected or erased, to restrict how it is used, to object, and to receive it in a portable format. Where we rely on legitimate interests, you can object, and we will stop unless we have compelling grounds to continue. Where we rely on consent, you can withdraw it at any time, without affecting what was done before.

If your request is about data in the platform, please contact your school first. The school is the controller, and teachers and administrators can view, correct, export and delete pupil data themselves. We help the school answer within one month.

For anything where we are the controller, write to legal@magmamath.com. We answer within one month.

13. Complaints

If you are unhappy with how we have handled your personal data, please tell us first so we can put it right. You also have the right to complain to the Information Commissioner's Office at any time: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, helpline 0303 123 1113, ico.org.uk.

14. Contact

- Data protection officer, data protection questions and requests about your own data: legal@magmamath.com
- Post: Radish Education UK Ltd, 1 Chapel Street, Warwick CV34 4HL

15. Changes to this policy

We review this policy at least once a year, and update it when the way we handle personal data changes in a way that matters. The date at the top shows the latest version. When a change significantly affects schools, we tell them directly.