

Data Protection Summary

The Business School · TBS Education Ltd Oy · Effective 28 April 2026

CONTROLLER / PROCESSOR

School = **Data Controller**. TBS Education Ltd Oy = **Data Processor**.

LAWFUL BASIS

Legitimate interest of the school (curriculum-aligned education) under UK GDPR Art. 6(1)(f).

UK DATA PROTECTION REGISTRATION

ICO Registration: ZC133810

Verifiable on the ICO public register at ico.org.uk.

WHAT WE COLLECT

DATA TYPE	DETAIL
Teacher	Name, email, school name, session history
Student	Self-selected nickname only (no real name, no email, no DOB, no photos). PIN-code join — no account, no password.
Gameplay	In-session decisions (purchases, pricing, VAT filing, hiring) and team scores
Technical	IP address (server logs only, 30-day auto-purge); browser/device headers; session timestamps

WHERE IT IS STORED

SUB-PROCESSOR	PURPOSE	LOCATION	SAFEGUARD
Netlify	Frontend hosting + edge CDN	Global edge; primary EU edge	SCC (UK Addendum)
Neon	Postgres database	AWS US East 1 — EU migration planned May 2026	SCC (UK Addendum); AES-256 at rest; TLS 1.2+ in transit
Anthropic	AI inference for end-of-session reports (Claude API)	EU and US regions	SCC (UK Addendum); no student personal identifiers sent to model

RETENTION

Free tier sessions: ephemeral — auto-deleted within 24 hours of session end. **Paid tier saved sessions:** teacher-controlled deletion. **Teacher accounts:** retained during subscription, deleted within 30 days of termination.

Server logs (IP): 30 days, auto-purged.

SHARING

No sale, no rental, no advertising profiling. The three sub-processors above process data solely to deliver their infrastructure or inference services. No marketing tracking cookies. PIN-code join eliminates credential risks.

RIGHTS AND COMPLAINTS

Under UK GDPR / EU GDPR: rights of access, rectification, erasure, restriction, portability, and objection. Student data requests are routed via the school as Data Controller. Complaints to the UK ICO at ico.org.uk/concerns or to the Finnish Data Protection Ombudsman at tietosuoja.fi.

CONTACT

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TBS Education Ltd Oy · Business ID 3614159-3 · ICO Registration ZC133810 · www.thebusiness.school · Effective 28 April 2026