

Privacy Policy

The Business School · www.thebusiness.school · Effective 28 April 2026

1. WHO WE ARE

The Business School is operated by **TBS Education Ltd Oy** (Finnish business identifier 3614159-3), registered in Lahti, Finland. We provide a browser-based business simulation for secondary-school and sixth-form classrooms.

UK DATA PROTECTION REGISTRATION

ICO Registration: ZC133810

TBS Education Ltd Oy is registered with the UK Information Commissioner's Office (ICO) as a fee-paying data controller. The registration is publicly verifiable on the ICO register at ico.org.uk.

Contact: sakari.laajoki@gmail.com.

2. OUR ROLE

When a school uses The Business School with its students, the **school is the Data Controller** and **TBS Education Ltd Oy is the Data Processor**. We process personal data only on the school's behalf and in accordance with their documented instructions, as set out in our Data Processing Agreement (DPA).

3. WHAT DATA WE COLLECT

3.1 Teacher data

- Name and email address (for account creation and licence management)
- School name (for licence management and invoicing)
- Session history (which simulations were run, dates, durations)

3.2 Student data

The Business School is designed to collect **minimal student data**:

- Students join via a 6-digit PIN code — **no email, no account, no login required**
- Students choose a self-selected nickname (not their real name) and a role (CEO, CFO, CMO, CHRO, COO, Sales Director)
- We record gameplay decisions (purchases, pricing, VAT filing, hiring) during the live session
- We record team scores for the teacher's grading dashboard
- We do **NOT** collect: real names, email addresses, dates of birth, home addresses, photos, or any other identifying information about students

3.3 Technical data

- IP addresses (server logs only, auto-purged after 30 days)
- Browser type and device information (standard HTTP request headers)
- Session timestamps

4. HOW WE USE DATA

- To deliver the simulation experience to students and teachers
- To generate scores and AI-powered post-session feedback reports for teachers
- To manage teacher accounts and school licences
- To improve the product based on aggregate, anonymised usage patterns

We do **NOT** use personal data for advertising, marketing profiling, or sale to third parties. We do **NOT** use cookies for tracking. The simulation uses only essential session cookies required for gameplay.

5. LAWFUL BASIS FOR PROCESSING

- **Teacher data:** Contract performance (delivering the subscribed service)
- **Student data:** Legitimate interest of the school (delivering curriculum-aligned education), with the school's authorisation as Data Controller
- **Technical data:** Legitimate interest (security and service operation)

6. WHERE DATA IS STORED

The Business School's infrastructure uses three sub-processors. Each is documented below with current location and the safeguards in place for international transfers.

SUB-PROCESSOR	PURPOSE	LOCATION	TRANSFER SAFEGUARD
Netlify, Inc.	Frontend hosting, edge CDN, serverless functions	Global edge network; primary EU edge nodes	Standard Contractual Clauses (UK Addendum) under UK GDPR Art. 46
Neon, Inc.	Postgres database (session state, scores, teacher accounts)	AWS US East 1 (current) — EU region migration planned May 2026	Standard Contractual Clauses (UK Addendum) under UK GDPR Art. 46. Data encrypted at rest (AES-256) and in transit (TLS 1.2+).
Anthropic PBC	AI inference for end-of-session teacher feedback reports (Claude API)	EU and US regions	Standard Contractual Clauses (UK Addendum). No student personal identifiers are sent — input is restricted to aggregated session data already collected under sections 3.1 and 3.2.

All connections use HTTPS / TLS 1.2 or higher. No student passwords exist — PIN-code join eliminates credential risks. Each classroom session is sandboxed and isolated from every other session.

7. DATA RETENTION

- **Free-tier session data:** ephemeral — auto-deleted within 24 hours of session end
- **Paid-tier saved sessions:** retained for as long as the teacher requires; teacher controls deletion
- **Teacher account data:** retained during subscription, deleted within 30 days of subscription termination
- **Server logs (IP addresses):** 30 days, then auto-purged

8. DATA SHARING

We do not sell, rent, or share personal data with third parties. The three sub-processors listed in section 6 process data solely to provide their infrastructure or AI inference services. A current list of sub-processors is maintained in our Data Processing Agreement and on our Trust Centre at thebusiness.school/trust.

9. YOUR RIGHTS

Under UK GDPR and EU GDPR, data subjects have the right to:

- **Access** — request a copy of the data we hold about you
- **Rectification** — correct inaccurate data
- **Erasure** — request deletion of your data
- **Restriction** — limit how we process your data
- **Portability** — receive your data in a machine-readable format
- **Objection** — object to processing based on legitimate interest

For student data, requests should be made by the school (as Data Controller) on the student's behalf. Contact: sakari.laajoki@gmail.com.

10. CHILDREN'S DATA

The Business School is designed for classroom use under teacher supervision, typically with students aged 14–18. Because students join via a PIN code and do not provide personal information, we do not knowingly collect or store data that identifies children. Parental consent for the use of the simulation is managed by the school as part of its standard IT and educational tools consent processes.

11. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. Material changes will be communicated to subscribing schools at least 30 days in advance via email. The current version is always available at thebusiness.school/data-protection.

12. CONTACT AND COMPLAINTS

If you have questions about this Privacy Policy or wish to exercise your data rights, please contact: **Sakari Laajoki, TBS Education Ltd Oy, sakari.laajoki@gmail.com**.

If you are not satisfied with our response, you have the right to lodge a complaint with the UK Information Commissioner's Office at ico.org.uk/concerns or the Finnish Data Protection Ombudsman at tietosuoja.fi.