Pearson SEE Whitepaper

Privacy Practices

Contents

Introduction

At Pearson, we prioritize data protection and privacy as essential aspects of our operations, integrating trust and privacy into the very foundation of our product and service development. This whitepaper serves to elucidate the privacy and security measures Pearson has established for Pearson SEE MBO, our integrated language test designed to assess all language skills, both receptive and productive.

Recognizing the significance of preserving our customers' data, this document, along with the [Terms and Conditions](#), [Privacy Policy](#) outlines our dedication to safeguarding user information by employing stringent data collection, processing, storage, and security protocols. Our commitment extends to adhering to relevant data protection legislation and regulations, ensuring that your data is handled with the utmost care and in compliance with applicable privacy standards.

Pearson SEE MBO Overview

Pearson SEE MBO is our comprehensive integrated language test. Designed to assess language skills holistically, Pearson SEE MBO covers both receptive and productive abilities. As a result, our test components often evaluate multiple skills simultaneously, reflecting the integrated nature of natural language use.

Within Pearson SEE MBO, we assess a range of essential language skills, including reading, writing, listening, and speaking. Additionally, our evaluation encompasses conversational proficiency, grammar, and vocabulary. By considering these core competencies together, we provide a comprehensive overview of an individual's language proficiency.

Through Pearson SEE MBO, we aim to offer a robust assessment that aligns with real-world language requirements. Our integrated approach ensures a more accurate representation of individuals' language abilities, allowing for a more comprehensive understanding of their linguistic competence.

Please note that specific details and components of Pearson SEE MBO may vary. We recommend reviewing the provided test materials and guidelines for a complete understanding of the assessment structure and expectations.

Data Collection and Processing

Collected personal data

The following table offers a concise overview of the various types of personal data we collect, as well as the intended purposes for each category:

Data Subject Categories	Categories of Personal Data Collected	Purpose of Collection
Student	first name	Identification of student in the exam platform
Student	last name	Identification of student in the exam platform
Student number	Student number	unique school ID is used to create usernames and confirms a student's name
School name	School Details	Organisation of the exam students by school
Exam course name	Exam course name	Organisation of the exam courses per school
Teacher	First and Last Name	Organisation of the exam groups per teacher whose responsibility is to assign exams and process the exam results

Legal Basis and Role of Pearson with respect to Pearson SEE MBO's Personal Data:

Data from MBO Institutions: Pearson collects personal data of MBO Institution's students through our data collection forms, a template Pearson created to collect the students' data (name and student number) and to onboard students into the Pearson SEE platform, which will be used to provide the MBO Institution with a pdf for each student with name and login credentials. When handling data provided by an MBO Institution, Pearson assumes the role of a data processor. We process personal data solely based on the instructions provided by the MBO Institution, which acts as the data controller in relation to the personal data they share with Pearson. We ensure strict compliance with the directives issued by the MBO Institution regarding data processing.

For students or Pearson SEE MBO test takers seeking to exercise their data subject rights, such as accessing their personal data, obtaining an explanation of the test results of the Pearson SEE MBO, challenge the results or objecting to the handling of their data, it is essential to directly contact the MBO Institution. Pearson will address such requests in accordance with the instructions received from the MBO Institution, as required.

It is crucial to emphasize that any inquiries or actions regarding data subject rights should be directed to the MBO Institution, as they retain primary responsibility for the personal data they have shared with Pearson. Pearson will facilitate and support the MBO Institution in addressing these requests in compliance with applicable data protection regulations.

For more details about the categories of data processing, purpose and legal basis, please refer to [Verwerkersovereenkomst Convenant 4.0 English Language Teaching Pearson](#) with [Annex 1 on Privacy](#) and [Annex 2 on Security](#).

Automated Processing and Algorithm

Pearson acknowledges its role as a data processor and pledges to actively support MBO Institutions, the data controllers, in meeting their obligations related to automated data processing in compliance with applicable data privacy laws, such as the General Data Protection Regulation (GDPR). We recognize the importance of privacy compliance and will provide necessary support to ensure adherence to these obligations.

To gain a comprehensive understanding of the score calculation process, we recommend consulting the following documents:
- [How to prepare students for the exam presentation:](#) We created this document for teachers to explain Pearson SEE to students (what is it, how does it work, what does adaptive mean, what does automated scoring mean and how does it work, which exam questions to expect). Teachers can use this Powerpoint with script in class.
- [Pearson SEE richtlijnenbundel](#) booklet: specifically section 2.2, "How Are Scores for the institutional exam calculated," and section 2.3, "How is the final score calculated" within the teacher/exam officer manual.

For more in-depth information on the test development process and automated scoring methods, please refer to the Test Information Booklet and Technical Report in the Pearson SEE *richtlijnenbundel*.

Human Intervention

While Pearson SEE MBO primarily relies on automated processing for language assessment, we understand that in certain situations, customers and test takers may prefer or require human intervention to verify specific test results. To accommodate this, we have established well-defined processes that allow for human intervention when requested to address individual requirements and provide further assurance. These processes ensure that qualified human experts can review and provide additional insights, providing an extra layer of verification and addressing any exceptional circumstances.

At Pearson, we value transparency and strive to meet the unique needs of our customers and test contact your consultant or email elt.service@pearson.com who will guide you through the necessary steps. To learn more about the process of human intervention and its role within Pearson SEE MBO, please refer to our dedicated page

Secure Storage Controls and Technologies

Pearson and its subcontractors are committed to safeguarding personal data collected via Pearson SEE MBO by employing appropriate operational, administrative, technical, and physical security measures to prevent loss, misuse, or alteration of the information under our control. Our approach includes encrypting all sensitive data transmissions and securing all data repositories. Using HTTPS encryption, personal information is protected from a user's browser to Pearson servers.

To provide optimal security for your data, the Pearson database utilizes Advanced Encryption Standard (AES) 256-bit encryption, a widely recognized and trusted encryption method. This robust security measure effectively protects your information from unauthorized access and ensures the confidentiality and integrity of your data while stored within our system.

Data Transfers and Storage

Pearson SEE MBO data is stored in Ireland and is encrypted at rest and in transit to AES256 and HTTPS standards.

Where Pearson engages a data processor to provide specific elements of the service, we ensure they have appropriate technical and organisational measures to protect Pearson data and are subject to appropriate data protection terms, as required by the U.K. GDPR. Pearson relies on the adequacy status of European Union (EU) and European Economic Area (EEA) countries as the specific transfer mechanism and Canada has been recognised as providing adequate level of protection by the European Commission.

In addition to that, Pearson's sales team based in Benelux and internal support teams based in Poland process Pearson SEE MBO's personal data for the purpose of registering students into the platform and providing support through the Pearson SEE helpline.

Data Retention

Personal data collected by Pearson SEE are hosted and stored in AWS and is encrypted at rest and in transit to AES256 and HTTPS standards.

We retain customer data in accordance with our data retention policies, which vary based on the nature of the data and applicable legal and business requirements. We ensure the timely disposal of data that is no longer needed or required to be retained. In terms of retention of student data, Pearson SEE anonymises after 4 years after last activity on the platform (i.e. submitting the exam)

Data Subject Rights

In situations where an institution provides personal data of the test takers of Pearson SEE MBO and acts as a data controller, the test takers should direct their data subject rights requests to the respective institution. If a user rights request involves Pearson SEE MBO personal data within the scope, the institution should forward the request to Pearson by emailing elt.service@pearson.com, and we will fulfill our part of the request accordingly.

Data Processor Compliance

Pearson has also implemented an intra-group data transfer agreement to ensure that Pearson affiliates process data in line with data privacy principles and applicable data protection laws. Additionally, third – party service providers acting as data processors are engaged by Pearson through our vendor management process to provide specific service elements. We perform due diligence to ensure appropriate technical and organisational controls are in place. Processors are subject to applicable data protection terms, as required by the applicable privacy laws including but not limited to GDPR and U.K. GDPR. Additionally, where applicable, Pearson has entered into appropriate data processing agreement including Standard Contractual Clauses and International Data Transfer Agreement with respect to cross-border transfers of data originating from EEA and UK respectively.

Data deletion and disposal procedures

We have implemented procedures for securely deleting or disposing of data once its retention period has expired or when requested by a data subject, in accordance with applicable laws and regulations.