

# Privacy Policy

Date: 19 August 2025

Jurisdiction: United Kingdom (UK GDPR + Data Protection Act 2018)

**Effective Date:** 19 August 2025

**Important:** This Privacy Policy applies to all service delivery methods including online sessions, face-to-face instruction, home-based services, and company-based training. All tutoring services require advance payment with payment plans tailored to your educational level.

## Scope and Application

This Privacy Policy explains how we collect, use, and protect personal data of learners and parents/guardians across all our educational service delivery methods:

- **Online Services:** Virtual tutoring sessions, digital learning platforms, and remote educational support
- **Face-to-Face Services:** In-person instruction at educational institutions, community centers, and approved locations
- **Home-based Services:** Educational support delivered at the learner's residence with enhanced safety protocols
- **Company-based Services:** Corporate training and professional development at client business premises

## Personal Data We Collect

### Universal Data Collection (All Service Types):

- **Identity Data:** Full name, preferred name, date of birth, contact details
- **Academic Profile:** Educational level, subjects, learning objectives, academic history
- **Usage Data:** Session attendance, learning progress, platform interactions

- **Payment Data:** Payment method, billing information, payment plan selection, transaction history
- **Communication Data:** Messages, feedback, support inquiries
- **Safeguarding Data:** When necessary for safety and legal compliance

Service-Specific Data Collection:

Service Type	Additional Data Collected	Purpose
Online Services	IP address, device information, browser data, session recordings	Platform security, technical support, safeguarding
Home-based Services	Home address, emergency contacts, household safety information, travel logs	Safety protocols, risk assessment, emergency procedures
Face-to-Face External	Meeting location preferences, accessibility requirements	Venue booking, accessibility compliance
Company-based Services	Corporate contact details, workplace address, security clearance level	Corporate compliance, workplace safety, professional development tracking

Payment Plan Data by Educational Level:

- **GCSE Level (Ages 14-16):** Parental payment authorization, monthly/term-based plans
- **A-Level/BTEC (Ages 16-18):** Flexible payment options, university preparation packages
- **University Level (Ages 18+):** Student loan integration, semester-based plans, individual payment responsibility
- **Professional Development:** Corporate billing arrangements, professional certification tracking
- **Corporate Training:** Business invoicing, group enrollment data, compliance reporting

How We Use Personal Data

Primary Purposes:

- **Service Delivery:** Provide educational services across all delivery methods

- **Payment Processing:** Process advance payments, manage payment plans, billing administration
- **Personalized Learning:** Tailor educational content to individual needs and learning styles
- **Safety and Safeguarding:** Ensure learner safety across all service environments
- **Quality Assurance:** Monitor and improve service quality and educational outcomes
- **Legal Compliance:** Meet regulatory requirements and legal obligations

### Service-Specific Uses:

- **Online Services:** Platform optimization, technical support, session quality monitoring
- **Home-based Services:** Risk assessment, safety protocol implementation, emergency response
- **Company-based Services:** Corporate reporting, professional development tracking, compliance monitoring
- **Payment Management:** Advanced payment processing, payment plan administration, refund processing

### Legal Bases for Processing

- **Contract:** Performance of educational services contract and payment processing
- **Legitimate Interests:** Service improvement, platform security, fraud prevention
- **Consent:** Marketing communications, optional features, photography/recording (where applicable)
- **Legal Obligations:** Safeguarding requirements, tax obligations, regulatory compliance
- **Vital Interests:** Emergency situations and immediate safety concerns

### Data Sharing and Third-Party Processors

We work with carefully vetted service providers under comprehensive data protection agreements:

### Technology Partners:

- **Video Conferencing:** Secure platforms for online learning delivery
- **Payment Processors:** Secure handling of advance payments and payment plan management
- **Learning Management Systems:** Educational content delivery and progress tracking

- **Communication Platforms:** Secure messaging and notification systems

Service-Specific Sharing:

- **Home-based Services:** Local authorities (for safeguarding), emergency services (when required)
- **Corporate Services:** Client organizations (for professional development reporting)
- **Educational Institutions:** Progress reporting (with consent)
- **Payment Services:** Financial institutions for payment processing and plan management

International Data Transfers

When we transfer personal data outside the UK/EEA, we ensure appropriate safeguards through:

- International Data Transfer Agreements (IDTAs)
- Standard Contractual Clauses (SCCs)
- Adequacy decisions by the UK Government
- Appropriate security measures for all service delivery methods

Data Retention

Data Type	Retention Period	Reason
Educational Records	7 years after service completion	Academic progression, reference provision
Payment Data	7 years after final payment	Tax obligations, financial auditing
Safeguarding Records	As required by law (minimum 7 years)	Legal compliance, child protection
Session Recordings	12 months (unless safeguarding concerns)	Quality assurance, dispute resolution
Corporate Training Records	5 years after completion	Professional certification, compliance

Security Measures

## Universal Security:

- End-to-end encryption for all communications
- Multi-factor authentication for account access
- Regular security audits and penetration testing
- Staff training on data protection and security
- Incident response procedures and breach notification protocols

## Service-Specific Security:

- **Online Services:** Secure video conferencing, encrypted data transmission, secure cloud storage
- **Home-based Services:** Enhanced DBS checks, secure mobile devices, encrypted communications
- **Company-based Services:** Corporate network security compliance, confidentiality protocols
- **Payment Security:** PCI DSS compliance, tokenization of payment data, fraud monitoring

## Your Rights Under UK GDPR

- **Right of Access:** Request copies of your personal data
- **Right of Rectification:** Correct inaccurate or incomplete data
- **Right of Erasure:** Request deletion of personal data (subject to legal obligations)
- **Right to Restriction:** Limit how we process your data
- **Right to Data Portability:** Receive your data in a portable format
- **Right to Object:** Object to processing for marketing or legitimate interests
- **Rights Related to Automated Decision-making:** Challenge automated decisions
- **Right to Complain:** Lodge complaints with the Information Commissioner's Office (ICO)

## Children's Privacy (Under 18)

For learners under 18, we implement enhanced privacy protections:

- Verified parental/guardian consent required for all data processing
- Age-appropriate privacy notices and communications
- Enhanced safeguarding measures across all service delivery methods

- Parental access to their child's data and privacy controls
- Restricted data sharing and enhanced security measures
- Regular review of consent as children mature (transitional provisions for 16-17 year olds)

## Cookies and Tracking Technologies

- **Essential Cookies:** Required for platform functionality and security
- **Analytics Cookies:** Help us improve our services (can be disabled)
- **Preference Cookies:** Remember your settings and choices
- **No Tracking:** We do not use cookies for advertising or behavioral tracking

You can control non-essential cookies through your account settings or browser preferences.

## Payment Privacy and Advance Payment System

**Important Notice:** All tutoring services require advance payment. We offer flexible payment plans tailored to different educational levels:

### Payment Plan Options:

- **GCSE Students:** Monthly plans, term-based packages, parental payment controls
- **A-Level Students:** Flexible monthly or quarterly plans, university preparation packages
- **University Students:** Semester-based plans, student finance integration options
- **Professional Learners:** Corporate billing, professional development accounts
- **Corporate Clients:** Custom invoicing arrangements, group enrollment options

Payment data is processed securely and retained for tax and auditing purposes. We do not store full payment card details and use tokenization for secure payment processing.

## Updates to This Privacy Policy

We may update this Privacy Policy to reflect changes in our services, legal requirements, or privacy practices. We will:

- Post updated policies on our platform with clear effective dates
- Notify users of material changes via email or platform notifications
- Provide reasonable notice before changes take effect

- Obtain new consent where required by law

## Contact Information

**Data Protection Officer (DPO):** [dpo@yourdomain.example](mailto:dpo@yourdomain.example)

**Privacy Team:** [privacy@yourdomain.example](mailto:privacy@yourdomain.example)

**General Support:** [support@yourdomain.example](mailto:support@yourdomain.example)

**Business Address:** Your Company, Address Line, City, Postcode, UK

## Information Commissioner's Office (ICO):

If you are not satisfied with our response to your privacy concerns, you can contact the ICO:

Website: [ico.org.uk](https://ico.org.uk) | Phone: 0303 123 1113

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