

# **GDPR** statement

This is the privacy notice of Tuition Extra (Kent) Limited. In this document, "we", "our", or "us" refer to Tuition Extra (Kent) Limited.

We are company number 08861767 registered in England. Our registered office is at 7a Roper Yard, Roper Road, Canterbury, CT27EH.

#### Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protectsyou.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <a href="http://www.knowyourprivacyrights.org">http://www.knowyourprivacyrights.org</a>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

#### **Data Protection Officer**

We have appointed a data protection officer (DPO) who is responsible for ensuring that our policy is followed.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO, Ruth Minhall at <u>ruth@tuition-extra.co.uk</u>.

#### **Data We Process**

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Your financial data includes information such as your bank account and payment card details.

Transaction data includes details about payments or communications to and from you and information about products and services you have purchased from us.

Technical data includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Your profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. Marketing data includes your preferences in receiving marketing from us; communication preferences; responses and actions in relation to your use of our services.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile data to assess interest in a product or service. However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as

personal information and it will be used in accordance with this privacy notice.

### **Special Personal Information**

We may collect special personal information about you if there is a lawful basis on which to do so.

If you do not provide personal information we need

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

#### The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

Information we process because we have a contractual obligation with you When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- provide you with our services

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## Information We Process for the Purposes of Legitimate Interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of.

- record-keeping for the proper and necessary administration of our business
- protecting your interests where we believe we have a duty to do so

Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

# **Job Application and Employment**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for [six years] before destroying or deleting it.

## **Communicating with Us**

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

Wekeeppersonallyidentifiableinformation associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

# Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

### Your Duty to Inform us of Changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

#### **Access to Your Personal Information**

At any time you may review or update personally identifiable information that we hold about you. To obtain a copy of any information you should contact us to make

that request. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

#### **Removal of Your Information**

If you wish us to remove personally identifiable information from our systems, you should contact us to make your request. This may limit the service we can provide to you.

## Verification of your Information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

# **How You Can Complain**

If you are not happy with our privacy policy or if you have any complaints then you should tellus.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a> We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

#### **Retention Period for Personal Data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law;
- to support a claim or defence in court.

# **Compliance with the Law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business.

# **Review of Policy**

We may update this privacy notice from time to time as necessary. If you have any questions regarding our privacy policy, please contact us.