



Privacy Notice

Policy Owner: Directors, AdaptEd Tuition Ltd

Approved By: AdaptEd Tuition Ltd Directors

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1. Policy Statement

AdaptEd Tuition ("we", "our", "us") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, store, and protect your personal information when you use our website, tutoring services, and online learning platforms.

It also explains your privacy rights and how the law protects you.

Please read this Privacy Notice carefully alongside any other privacy notices we may provide when collecting or processing your personal data.

2. Who We Are

AdaptEd Tuition Ltd is the data controller for personal data where it determines the purposes and means of processing, including personal data used to administer and deliver its own tutoring services.

For some services commissioned by a school, Local Authority or other organisation, AdaptEd Tuition Ltd may act as a data processor for specified processing activities carried out on that organisation's behalf and under its documented instructions. This depends on the actual arrangements for the relevant processing; commissioning tuition does not, by itself, make AdaptEd Tuition Ltd a processor.

Where AdaptEd Tuition Ltd acts as a processor, a written data-processing agreement meeting the requirements of Article 28 UK GDPR must be in place before that processing begins. AdaptEd Tuition Ltd may remain a controller for other processing activities within the same engagement.

The relevant roles and responsibilities will be recorded in the commissioning documentation and explained in the privacy information provided to affected individuals, as applicable.

Contact Details

- **Data Protection Contacts:** Hayley Rollings and Gary Essex, who oversee data protection and privacy matters at AdaptEd Tuition.
- **Email:** info@adaptedtuition.org
- **Website:** www.adaptedtuition.org
- **Registered Business Address:** 71–75 Shelton Street
Covent Garden, London, WC2H 9JQ
- **Business Structure:** Limited Company
- **Company Registration Number:** 17108970

If you have any questions regarding this Privacy Notice or wish to exercise your legal rights, please contact us using the details above as we would appreciate the opportunity to address your concerns before you contact the ICO.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Website: <https://www.ico.org.uk>

3. Our Commitment to Confidentiality

At AdaptEd Tuition, we understand the importance of protecting the privacy of students, parents, guardians, tutors, and website users.

We will only use personal information for legitimate educational and business purposes and will not disclose confidential information unless required by law or where necessary to provide our services.

We maintain appropriate technical and organisational measures to safeguard all personal data.

4. Changes to this Privacy Notice

We review this Privacy Notice regularly and may update it from time to time to reflect changes in legislation, our services, or our business practices.

The latest version will always be available on our website.

5. Your Responsibilities

It is important that the personal data we hold about you remains accurate and up to date. Please inform us promptly of any changes to your contact details or other personal information.

6. Complaints and Queries

We aim to maintain the highest standards when collecting and using personal information. If you have concerns about how we handle your data, please contact us first so that we can investigate and resolve the matter.

We welcome feedback and suggestions to improve our privacy practices.

7. Access to your Information and Data Portability

You have the right to request access to the personal data we hold about you.

Upon request, we can provide:

- Details of the information we hold.
- The reasons we process it.
- Information about any third parties with whom it has been shared.
- A copy of your personal data in an accessible format where reasonably possible.

Requests may be made verbally or in writing using the contact details provided in this Privacy Notice.

8. How We Use Your Data

We use personal information to:

- Assess tuition requirements and educational needs.
- Match learners with suitable tutors.
- Deliver tutoring services.
- Manage bookings and lesson scheduling.
- Process payments and invoices.

- Communicate with learners, parents, guardians, schools, Local Authorities and tutors.
- Respond to enquiries and support requests.
- Meet legal and regulatory obligations.
- Maintain safeguarding standards.

We do not sell personal data and do not share personal information with third parties for their own marketing purposes.

Where testimonials or reviews are used in marketing materials, we will seek permission before publishing any identifying information.

9. Data Breaches

AdaptEd Tuition maintains procedures for identifying, managing, investigating, and responding to personal data breaches and cybersecurity incidents. This includes incidents involving unauthorised access, loss of personal data, phishing attacks, malware, compromised accounts, or accidental disclosure of information.

If a breach occurs that is likely to result in a risk to your rights and freedoms, we will take appropriate action, including notifying affected individuals and reporting the breach to the ICO where required by law.

10. The Personal Data we Collect

We may collect and process the following categories of personal data:

Identity Data

- Name
- Date of birth
- Title
- Gender (where provided)

Contact Data

- Home address
- Email address
- Telephone number
- Emergency contact details

Educational Data

- School year group
- Subject requirements
- Learning goals
- Educational assessments
- Exam results
- Academic progress information
- Photographs with consent
- Attendance and Absence information
- Health and Safety information

Special Category Data

- Safeguarding information
- Health and Welfare information

- SEND data

Financial Data

- Payment information
- Billing details

Transaction Data

- Payment history
- Booked lessons and services

Technical Data

- IP address
- Browser type and version
- Device information
- Website usage information

Profile Data

- Account information
- Feedback
- Preferences
- Survey responses

Marketing and Communications Data

- Marketing preferences
- Communication preferences

We process special category personal data where necessary for:

- safeguarding children
- providing appropriate educational support
- meeting legal obligations
- protecting the vital interests of learners

We rely on the relevant conditions under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018 where required.

11. Children's Data

As an educational provider, we process personal data relating to children.

Where appropriate, information is collected and managed through parents or legal guardians. We take additional care to ensure that children's personal information is handled responsibly and securely. We also provide privacy information to children in age-appropriate language so they understand how their information is used.

We only collect information necessary to provide educational services and maintain safeguarding standards.

12. Lesson Recording and Safeguarding

Lesson recordings are **not routinely made**. Recording will only occur where necessary for safeguarding, complaint investigation, tutor supervision or other legitimate reasons identified by AdaptEd Tuition.

Where recordings are made:

- Recordings are stored securely.
- Access is restricted to authorised personnel.
- Recordings are retained only for as long as necessary.
- Recordings are permanently deleted when no longer required.

Parents, guardians, learners, or tutors may request further information regarding lesson recording arrangements by contacting us.

Any recording practices will comply with safeguarding obligations and applicable data protection laws.

Online Teaching Platforms

We use one or more of the following platforms to deliver online tuition:

- Pencil Spaces via Tutorcruncher
- Google Meets
- Microsoft Teams
- Zoom

Lesson Recording Practices

Learners and tutors must not independently record lessons unless prior permission has been granted by the Designated Safeguarding Lead (DSL).

In certain circumstances, it may be necessary for a lesson to be recorded for safeguarding purposes. Where this applies, recording will only take place in accordance with the organisation's safeguarding procedures.

Parents, guardians, tutors, or learners who do not wish for online lessons to be recorded may submit a written request by emailing info@adaptedtuition.org. In such cases, alternative safeguarding measures will be implemented to ensure the safety and security of both the learner and the tutor.

Purpose of recordings:

- Safeguarding
- Quality assurance
- Tutor training and supervision
- Investigation of complaints or concerns

Storage of Recordings

Lesson recordings are password protected and stored securely on an encrypted or otherwise secure platform. Access is restricted through appropriate user permissions, authentication controls, and cybersecurity measures. Recordings must not be downloaded, copied, shared, or stored on personal devices unless expressly authorised by AdaptEd Tuition for safeguarding or operational purposes.

Retention Period

Recordings are retained for: no longer than 3 months. Following this period, recordings are securely and permanently deleted unless required for safeguarding or legal purposes.

Access to Recordings

Access is restricted to:

- Directors of AdaptEd Tuition
- Authorised safeguarding personnel
- Tutors if necessary for training or safeguarding purposes

Consent

Where required, parents, guardians, learners and tutors will be informed about lesson recordings and any necessary consent will be obtained in accordance with UK data protection

13. Failure to Provide Personal Data

Where we require personal information to provide our tutoring services or comply with legal obligations, failure to provide that information may prevent us from delivering services or entering into a contract with you.

14. How We Collect Personal Data

We collect personal data through:

Direct Interactions

Information you provide when you:

- Submit an enquiry.
- Register for tuition services.
- Complete assessment forms.
- Book lessons.
- Create an online account.
- Subscribe to communications.
- Contact us by email, phone, or through our website.
- Complete surveys or provide feedback.

Automated Technologies

When you use our website, we may automatically collect technical information such as IP address, browser type, and website usage data through cookies and similar technologies. Our website uses cookies and similar technologies. When you first visit our website, you will be given the option to accept or decline non-essential cookies

through our cookie banner. Essential cookies, which are necessary for the operation of the website, cannot be disabled.

15. Lawful Bases for Processing

The lawful basis that applies to each type of our processing is in the table below:

Purpose	Lawful Basis
Deliver tuition	Contract
Communicate with parents	Contract
SEND and safeguarding information	Legal obligation and/or safeguarding (public interest/vital interests where applicable)
Quality assurance	Legitimate interests
Lesson recordings	Legitimate interests or legal obligation (depending on why recorded)
Marketing emails	Consent
Payment Processing	Contract
Responding to Enquires	Legitimate interests

You may withdraw consent at any time.

16. Automated Decision Making and Profiling

AdaptEd Tuition does not make decisions about individuals based solely on automated processing, including profiling, where those decisions would produce legal effects or similarly significant effects.

All decisions relating to admissions, tutor matching, safeguarding, educational support, and the provision of our services involve human review and judgement.

17. Marketing Communications

We may occasionally send information about services, educational resources, updates, or events that may be relevant to you.

You may opt out of marketing communications at any time by contacting us or using the unsubscribe link in our emails.

We will not share your personal data with third parties for marketing purposes without your explicit consent.

18. Sharing Your Personal Data

We only share personal data where necessary, appropriate and lawful, including to deliver our services, meet legal and regulatory obligations, safeguard learners, investigate complaints or concerns, and obtain professional advice.

Tutors, approved substitutes and other authorised individuals handling personal data on our behalf must comply with applicable documented instructions, confidentiality obligations and security requirements. Access is limited to the information necessary for their role.

We assess service providers processing personal data on our behalf to ensure that appropriate security measures are in place. Where a provider acts as our processor, we put in place a written data-processing agreement meeting the requirements of Article 28 UK GDPR.

Some recipients, including schools, Local Authorities, professional advisers, regulators and safeguarding agencies, may act as independent controllers for the personal data they receive.

We may share personal data with trusted third parties who help us deliver our services, including:

Educational Services

- Tutors providing educational services on our behalf.

Online Teaching Platforms

We may use:

- Pencil Spaces via Tutorcruncher
- Google Meets
- Microsoft Teams
- Zoom

Payment Providers

We may use payment providers such as:

- Stripe
- Bank Transfer

Booking and Management Systems

We use Tutorcruncher as a booking and management system.

IT and Website Providers

We may share information with:

- Website hosting providers
- Email service providers
- Cloud storage providers
- IT support provider

Safeguarding Agencies

- Where necessary and lawful, we may share relevant personal data with safeguarding agencies, children's social care services, the police and other appropriate authorities to protect learners or others from harm.

Professional Advisers

Where necessary, we may share information with:

- Accountants
- Insurers
- Solicitors
- Regulatory authorities
- Schools
- Local Authorities
- Other professional advisers where legally required

Personal data shared with these recipients must be limited to what is necessary for the relevant purpose. Sharing must comply with applicable data protection requirements, including additional conditions and safeguards where special category or criminal offence data is involved.

AdaptEd Tuition Ltd will never sell personal data to third parties.

19. International Transfers

We aim to store and process personal data within the United Kingdom.

Where personal data is transferred outside the UK, we will ensure an appropriate safeguard is in place, such as an International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism recognised under UK GDPR.

20. Data Security and Cybersecurity

AdaptEd Tuition Ltd is committed to protecting personal data against accidental loss, unauthorised access, misuse, alteration, disclosure, or destruction. We recognise the importance of maintaining strong cybersecurity practices to protect the personal information of learners, parents, guardians, tutors, staff, and website users.

We maintain appropriate technical and organisational measures designed to ensure the confidentiality, integrity, and availability of personal data.

Our cybersecurity measures include, where appropriate:

Access Controls

- Access to personal data is limited to authorised individuals who require it to perform their role.
- User permissions are reviewed regularly to ensure individuals only have access to information necessary for their responsibilities.
- Accounts are removed or access rights amended promptly when no longer required.
- Confidential information is not shared through unauthorised channels.

Password Security

We operate secure password practices to reduce the risk of unauthorised access.

These include:

- All systems containing personal data must be protected by strong passwords.
- Passwords **must not** be shared with other individuals.
- Users must avoid using the same password across multiple systems where possible.
- Passwords should contain a combination of upper and lowercase letters, numbers, and special characters where supported.
- Default passwords must be changed before systems are used for business purposes.
- Passwords must be stored securely and must not be written down or stored in unsecured locations.
- Multi-factor authentication (MFA) is enabled where available, particularly for systems containing personal or sensitive information.
- Where appropriate, access may be suspended following repeated failed login attempts or suspected unauthorised activity.

Cybersecurity Protection

We use appropriate cybersecurity measures including:

- Secure, password-protected systems.
- Multi-factor authentication where available.
- Encrypted cloud storage and secure data transfer methods.
- Secure website hosting.
- Firewall protection.
- Anti-virus and anti-malware protection.
- Regular software updates and security patches.
- Secure configuration of devices and systems used for business purposes.
- Regular review of third-party platforms used to process personal data.
- Secure backup arrangements where appropriate.
- Monitoring for suspected security incidents.

Device Security

Where devices are used to access AdaptEd Tuition systems or personal data:

- Devices must be protected with passwords, PINs, or biometric security where available.
- Devices must have appropriate security updates installed.
- Devices must not be left unattended while logged into systems containing personal data.
- Lost or stolen devices must be reported promptly so appropriate action can be taken.
- Personal data should not be stored locally unless necessary and appropriately protected.

Staff and Tutor Responsibilities

All staff, directors, tutors, and authorised individuals accessing personal data must:

- Maintain confidentiality of personal information.
- Follow cybersecurity procedures and instructions.
- Report suspected phishing emails, malware, unauthorised access, or security concerns promptly.
- Complete any required data protection or cybersecurity training.
- Only access information necessary for delivering AdaptEd Tuition services.

Phishing and Cyber Threat Awareness

AdaptEd Tuition recognises that cyber threats, including phishing emails, fraudulent communications, malware, and unauthorised attempts to access accounts, may present risks to personal data.

Individuals working with AdaptEd Tuition should remain vigilant and must not:

- Click suspicious links or attachments from unknown sources.
- Provide passwords or login details in response to unexpected requests.
- Ignore suspected cybersecurity incidents.

Any suspected cybersecurity incident must be reported immediately to AdaptEd Tuition so that appropriate investigation and mitigation steps can be taken.

21. Data Retention and Records Management

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to meet our legal, safeguarding, regulatory and contractual obligations. Our typical retention periods include:

Record	Typical Retention Period
Learner, Parent and Guardian Records	Up to 7 years after tuition ends, unless a longer period is required by law or safeguarding obligations.

Tutor Records	Up to 7 years after tuition contract ends, unless a longer period is required by law or safeguarding obligations.
Financial Records	6 years in accordance with legal and accounting requirements.
Lesson Recordings	No longer than 3 months, unless required for an ongoing safeguarding, legal or complaint investigation.
Safeguarding Records	For as long as necessary in accordance with our safeguarding responsibilities, legal obligations and any applicable guidance.

Where required by law, we may retain certain records for longer periods.

When data is no longer needed, it is securely deleted or anonymised and a record is kept of when the data was deleted.

22. Your Rights

Under UK data protection law, you have the right to:

- Access your personal data.
- Correct inaccurate personal data.
- Request deletion of your personal data.
- Restrict processing of your personal data.
- Object to certain processing activities.
- Request transfer of your personal data.
- Withdraw consent where processing is based on consent.

To exercise any of these rights, please contact us using the details provided in this Privacy Notice.

23. Fees and Response Times

Electronic copies will normally be provided free of charge. Where a paper copy is specifically requested, we may charge a reasonable administrative fee to cover printing and postage.

We aim to respond to all legitimate requests within one month, although complex requests may take longer. If additional time is required, we will keep you informed. This is in line with the Data Protection Act 2018.

24. Verification of Identity

For security purposes, we may request information to verify your identity before processing requests relating to your personal data.

25. Contact Us

For any privacy-related questions, concerns or requests, please contact AdaptEd Tuition:

Contact Details

- **Data Protection Contact:** Hayley Rollings and Gary Essex, who oversee data protection and privacy matters at AdaptEd Tuition.
- **Email:** info@adaptedtuition.org
- **Registered Business Address:** 71–75 Shelton Street
Covent Garden, London, WC2H 9JQ
- **Business Structure:** Limited Company
- **Company Registration Number:** 17108970

We are committed to protecting your privacy and ensuring that your personal data is handled responsibly, securely and transparently.