



Privacy Notice

Policy Owner: Directors, AdaptEd Tuition

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1. Introduction

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 responsible for your personal data.

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

We have procedures in place to minimise the risk of data breaches.

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 with access restricted to authorised personnel.

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

All third parties are required to process personal data securely and only for authorised purposes.

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 providers

Professional Advisers

Where necessary, we may share information with:

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

We share personal data with these providers solely for the purpose of delivering tuition, managing bookings, processing payments and supporting our services.

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

Only authorised individuals are permitted access to personal data where necessary for their role.

We have implemented appropriate technical and organisational security measures including:

- Password-protected systems
- Multi-factor authentication (where available)
- Restricted access controls

- Encrypted cloud storage
- Secure website hosting
- Firewall protection
- Anti-virus and anti-malware software
- Staff confidentiality agreements
- Regular software updates
- Secure disposal of confidential information

21. Data Retention

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.