

Privacy Policy

The General Data Protection Regulation (GDPR)

On 25th May 2018, the current data protection law will change to become the General Data Protection Regulation (GDPR).

The GDPR will enforce several changes in the ways in which businesses collect, store, use, manage, retain and eventually destroy the personal data of pupils, parents and others. The Information Commissioner's Office (ICO) has made it clear that, whilst the law comes into force in May of this year, it sees compliance with the law as being an ongoing process. By this, it means that it expects organizations to be in a compliant state by May but that future event will undoubtedly influence the way businesses to work, and so their ways of complying with the law will need to evolve as time progresses.

Overview

The purpose of this document is to explain the privacy policy:

- What information we collect from you (and why we collect it),
- How we use and share that information,
- The choices you have, including how to access, update and delete your information.

This policy applies to all products and services offered by ACE 11+ Tuition

("ACE Tutorial LLP", "ACE Tuition & Publications Ltd.", "we," "us," "our," and our subsidiaries).

Our Privacy Policy is designed to provide transparency into our privacy practices and principles.

HOW WE COLLECT THE INFORMATION

We are a specialist tuition provider for 11+ entrance and private school examinations. We teach Maths and English i.e. subjects commonly taught in primary schools. Parents send us an enquiry on website/phone/email to get more information about the tuition. After the enquiry process, some parents may decide to not join the tuition while others join. Depending on the parent type (enquiry only/ tuition), we currently gather the information via the following channels:

- Through our website when you submit enquiry form (only name and email)
- Through our email when you send us details via email
- Through Terms and Conditions online form
- Through text messages/Whatsapp when you send us details on the phone

WHAT INFORMATION WE COLLECT

There are two categories of our clients -

- **Enquiry only:** Parents who only enquire but do not sign up for the tuition. The information submitted by the parents are:
 - Parent's name
 - Email
 - Phone (Primary)
 - Child's name (optional)
 - Child's school name and year
 - Catchment

- **Tuition parents:** Parents who have signed up for the tuition and their child takes one or more class.

At the time of admission, we are gathering the following information to help us provide the best possible study guidance, strategy for preparation, information on catchment and assign a suitable class to the students.

- Parent's name
- Email
- Phone (Primary)
- Phone (Secondary)
- Student's name
- Student's Date of birth
- Gender
- School
- Address

Our classes are specialised based on a variety of parameters such as – your target school(s), child's performance in assessment and at school, catchment etc. As a tuition provider, we provide tuition and customized guidance to parents. In order to achieve this, we are collecting, processing and storing certain information about you.

At the time of results, parents provide us scores and result in various exams for their child.

HOW DO WE STORE INFORMATION

We are fully committed to protecting the data we hold and is doing so by employing reasonable and appropriate security measures to protect against the loss, misuse, and alteration of the personal information it processes. The data is entered via

a) ACE 11+ Tuition website (<http://www.ace11plustuition.co.uk>): All data is secured on web-hosting servers.

b) Sent via email: All emails are secured on email servers.

c) Sign up Terms & Conditions: Parents sign T&C online that uses Secure Socket Layer (SSL) and paperless form.

The data is extracted to a computer which is protected by Windows authentication, i.e. individual username and password that must be entered to log on. These safeguards help protect against unauthorized access, maintain data accuracy, and provide for the appropriate use of personal information. In addition to this, we have the best of breed technology to secure our network and all of our devices including all mobile devices and laptops to ensure your data is secure we use. This software (operating system, anti-virus etc..) is regularly updated.

HOW WE USE YOUR INFORMATION

- **Accounting:** Your data is primarily used to produce invoices and accounting. We use parent's names, address and child's name on the invoices. These invoices are stored for a period of 6 years so that we are compliant with HMRC.
- **Communication & updates:** The contact details are stored on the business phone so that we can contact the parents for regular updates and in the event of any emergencies.
- **Unique Id:** All students are given a unique id to give anonymity. The results of any assessments are released internally but only id's are published (not names).
- **Success Stats:** We publish our success stats every year. Parents provide us with the 11+ results for their child. However, we compile the summary results no personal information is displayed in these statistics.

We are a very popular tuition provider and generally don't advertise our services. As per the current business model, we don't plan to advertise or print marketing material. In future, we may take photographs of your child (consent taken during the admission process) to put on our website or on marketing material. Every effort would be made to ensure that parents are informed in advance and necessary approvals are taken.

Basically, we don't sell or rent your personal information to any third-parties. We believe your information is yours, and you should own it - we think that's the right way to operate.

HOW LONG WE STORE THE INFORMATION FOR

We will hold the data for as long as it is accurate and relevant to the tuition service we are offering.

We don't intend to keep the data where it is not being used for its original purpose. Therefore personal data given at the time of enquiry will be deleted after reaching its retention period. The enquiry only data would be deleted within 3 years or earlier if it is not being used for its original purpose.

However, the personal data for tuition parents (i.e. who have enrolled for service) is kept for a longer period as we believe in good faith that the law or relevant regulators and HMRC require us to preserve accounting data for 6 years+ 1. (<https://www.gov.uk/government/publications/hmrc-records-management-and-retention-and-disposal-policy/records-management-and-retention-and-disposal-policy>)

After this period, it is likely your data will no longer be relevant for the purposes for which it was collected. When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services.

WHY WE PROCESS THE INFORMATION

We process your data primarily for accounting purposes as it is impossible to conduct our business otherwise. We do not sell your data or share with any third party provider. By using legitimate interest, we commit to protecting your interest, being transparent, fair and ensuring your data is protected, and the processing of data will not cause you harm in any way.

In some circumstances, we rely on consent for processing your data for marketing purposes. The consent is given on the signed Terms & Conditions.

INTERNATIONAL TRANSFER OF DATA

We do not do any international transfer of data or store your information within the European Economic Area (EEA) or countries.

In future, where we share your information with companies based outside (i) the EEA or (ii) countries with an adequate level of data protection, we contractually require these companies to handle your information on a similar basis to us. In those cases, we will ensure that the transferred information is protected. Further details of any transfer including copies of any data transfer agreements we use would be available from us on request.

YOU ARE IN CONTROL

You have a number of rights in relation to your personal data. You have the right to access your data, correct any mistakes in our files, the right to have your personal data erased (enquiry only) and to restrict or object to processing. You also have the right to withdraw your consent, opt-out of receiving future marketing, and in some circumstances, you have the right to have your information transferred to you or a third party, and the right to object to profiling and automated decision making.

CONTACTING US

The primary point of contact for all issues from this notice, including a request to exercise data subject rights, is our Data Protection Officer. The Data Protection Officer can be contacted by email at **contact@ace11plustuition.co.uk**.

Filing a complaint - If you feel your data is processed in an unlawful way and your interests have been harmed, you can file a complaint with the Office of the Data Protection Commissioner.

If you are not happy with our policy or believe your data is processed for reasons outside of this policy, please contact us using the contact details below, and we will deal with your request without undue delay, within a maximum of 30 days.

You can also lodge a complaint about our processing of your personal data with your Supervisory Authority: <https://ico.org.uk>

Update: We regularly reviews its ways of working to comply with the current data protection regulations and has reviewed its practice with a view to being compliant with the GDPR by May 2018. The Privacy Notice was updated in May 2018. We reserve the right to amend it from time to time.