



Data Protection Policy

Overview

The purpose of this policy is to explain our Data Protection:

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

This policy applies to all products and services offered by Study Right.

How we collect Information

We are an After School tuition provider that teaches Maths, English, Science, I1+ and an Education 360 programme (i.e. subjects commonly taught from Primary school through to College). Parents send us an enquiry on our website, phone and email to get more information about our tuition services. After the enquiry process, some parents may decide to not join whilst others may choose to.

There are two categories of our clients:

- 1) Enquiry only: *Parents who only enquire but do not sign up. The information submitted by parents/carers are:*
 - Child's name and surname
 - Parent's name, email address and phone number
 - Child's age and academic year
- 2) Parents who have signed up: *Parents who have signed up and their child takes one or more class.*

At the time of admission, we gather the following information in an application form to help us provide the best possible study guidance, strategy for preparation and to help assign a suitable class:

- Child's name, surname, DOB, gender and address
- Parent/guardian's name, email address and phone number
- Emergency contact number's name, email address and phone number
- If the child is special needs or has any medical conditions
- Child's academic year and school
- Provisional timetable at Study Right

Our classes are specialised based on a variety of parameters such as school, child's performance in assessments and at school. We are continuously collecting, processing and storing certain information about our students. This information is collected and stored as a hardcopy in a locked file. Student's assessment results will be kept with the application form which contains their name and results. 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 do 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:

- Study Right website (<http://www.studyright.co.uk>): *All data is secured on web-hosting servers.*
- Email: *All emails are secured on email servers.*
- Study Right internal databases and portals: *All data is accessed through username and password secured computers.*

These safeguards help protect against unauthorised access, maintain data accuracy, and provide for the appropriate use of personal information.

How we use the Information

Accounting: 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 and updates: The contact details are stored on an internal database so that we can contact the parents for regular updates and in the event of any emergencies.

Unique ID reference number: All students are given a unique reference to provide anonymity.

Success statistics: We publish our success stats every year. Parents provide us with the results for their child. However, we compile the summary results no personal information is displayed in these statistics.

Some marketing campaigns include photographs of children from the inside the centre. We take parental consent before any marketing material is published. Every effort is made to ensure that parents are informed in advance and necessary approvals are taken. Where possible we use animated graphics rather than photographs of children.

We don't sell or rent any 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 Information for?

We hold data for as long as it is accurate and relevant to the tuition service we are offering. Where it serves no purpose, it is disposed of via shredding and deletion online or on internal databases.

We don't intend to keep 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, personal data for parents who have signed up (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.

How long we store Information for?

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.

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.

Being 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 ali@studyright.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.