

Privacy Policy

Introduction

Your privacy is important to us. This privacy policy explains how we maintain the privacy of your personal data and explains your legal rights and our legal obligations in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2018 (collectively, the “**GDPR Regulations**”).

It explains what information we collect about you and why. What we do with the information and under what circumstances we share it. This policy also provides further information on your rights under GDPR and the actions you can take to address any concerns you may have. Please read it carefully. If we update this policy, we will post any changes on our website.

Who are we?

In this policy, “we”, “us” or “our” refers to Brighter Minds Tutoring. The legal information for which is: Brighter Minds Tutoring. 219 Goldfinch Road, Poole Dorset. We provide tuition services (i.e., using self-employed tutors) to clients through our tuition services.

For the purposes of the GDPR Regulations, we are the data controller.

Your acceptance of this policy

By giving your details to us through our social media pages or providing your information via email or via the telephone, you consent to us using the information you provide in the ways set out in this policy.

If you do not agree to this policy, please do not contact us through our social media pages or sign up to our services.

If you sign up to one of our services or events, you consent to receiving emails while you are using our service. These emails are important for current customers to stay up to date with our latest information and events. Please notify us if you would prefer not to receive such emails/updates.

What is personal data?

Personal data is information that can be used to identify an individual, such as name, address, phone number or email address. This information will stay confidential unless in an emergency where it is vital that emergency services staff needs to know more about your child.

What information do we collect about you?

We will only collect the personal data we need about students, their parents, legal guardians or other persons that arrange tuition on their behalf (i.e., clients), employees of Brighter Minds Tutoring, sub-contracting tutors and volunteer tutors that wish to provide tuition on our behalf. The information collected may include:

| Information typically collected: | Client | Students | Tutors | Staff |
|----------------------------------------------------------------------------|---------------|-----------------|---------------|--------------|
| Relevant personal details | Yes | Yes | Yes | Yes |
| Contact details – address and telephone number | Yes | Yes | Yes | Yes |
| Bank account information | Yes | | Yes | Yes |
| School information, incl. subjects, year group | | Yes | | |
| Medical information (whilst under our supervision/taking part in an event) | | Yes | | |
| Special requirements, e.g., SEN / EHCP | | Yes | | |
| 11+ Mock reports | | Yes | | |
| CVs, cover letters and interview notes | | | Yes | Yes |
| References and academic certificates | | | Yes | Yes |
| Criminal records background checks | | | Yes | Yes |

Note that the GPDR Regulations have additional requirements in place that must be met in order to store personal data relating to criminal records background checks (specifically in our case, an Enhanced Disclosure & Barring Service (DBS) Certificate). We are entitled to request and store this personal data as we are supplying tuition services to children and, in certain cases, to vulnerable adults with special educational needs (SEN). We also require our tutors to register for the DBS update service and provide us with permission to use the update service to check that their Enhanced DBS Certificates remain valid.

How do we collect this information?

We may collect and process information you give us, for instance by filling in online forms, by contacting us by phone, providing information via email or interacting with us via Facebook.

In the event that you apply for a job with us or to represent us as a tutor, we will require detailed information about you in order to make sure that you are suitable for the role and to comply with our Safeguarding and Child Protection Policy – information will be gathered by way of face-to-face or virtual interview, provided by you, and, with your permission, provided by third parties.

In addition, when you visit our website, we use Google Analytics to analyse traffic, see what content is popular and where readers come from. Google utilises data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <https://www.google.com/analytics/terms/us.html>.

On what basis do we use your information?

Our lawful basis for processing your data is contractual. We will use the information you provide to:

Where we store your personal data

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Information is stored by us using Microsoft Office 365's OneDrive for Business secure cloud-based server, with two-step verification required to access our server and protection provided by Microsoft's stringent security measures, which includes advanced encryption of the data in transit and data at rest.

We may also store information in paper files and have security measures in place to attempt to protect against loss, misuse, and alteration of personal data.

Your personal data i.e., name and email address are stored using our secure cloud-based accounting and booking software system (Appointed and XERO).the data centres meet the strictest security standards, including ISO 27001, 27017 and 27018 certifications, and comply with the EU General Data Protection Regulation (GDPR) and are located in Ireland.

Unfortunately, the transmission of information via the internet is not completely secure. Whilst we'll do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

Sharing of your information

We share certain personal data about the student with the tutor(s) and / or staff that we think would be suitable for your assignment. The tutors will only process your personal data on our instructions, and they must keep it confidential.

Where information is considered sensitive, for example, information shared with us from a student's Education, Health and Care Plan (EHCP), we will specifically seek your permission before sharing it with a tutor. In all other cases, we will share information that we feel is relevant to helping the tutor provide the tuition services, unless you request otherwise.

Each tutor signs Terms & Conditions with us which requires them to maintain the confidentiality and security of any information shared with them about the client and / or student and any information gathered by them in the course of providing tuition. Tutors agree not to disclose such information to a third party, other than as required by law, court order or any governmental or regulatory authority, or in terms of our Safeguarding and Child Protection Policy.

We will never sell, trade, or disclose any personal information to any third party (other than to any of our service providers, and only to the extent necessary to provide such service and in cases where we are satisfied with their privacy policies and procedures), other than as required by law, court order or any governmental or regulatory authority, or in terms of our Safeguarding and Child Protection Policy.

Third party service providers also have in place their own privacy policies, which prevents them from selling, trading or renting your personal information to others.

We confirm that we do not transfer personal data outside of the European Union.

Our retention of your information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

For tax purposes the law requires us to keep basic information about our customers (including communications and customer data) for six years after they stop being customers.

Your legal rights

Under GDPR you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data (where the lawful ground of processing is consent) and to withdraw consent.

You can make a request expressing your rights by contacting us via email at brightermindsbroadstone@gmail.com or you may write to us at our registered office address: Brighter Minds Tutoring, 219 Goldfinch Road, Poole, BH177TB.

Please note that while we will endeavour to make the updates as promptly as possible, communications may be sent using the original details until the changes have been processed.

Further information about your data rights is provided at <https://ico.org.uk/your-data-matters/>.

If you are not happy with any aspect of how we collect and use your data you have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/concerns/>) the UK's supervisory authority for data protection issues. We would be grateful if you contact us first if you do have a complaint, so that we can try and resolve it for you.

This privacy policy was last updated on 12 April 2024.