

Kevin Dadswell Tutoring Services Privacy Policy for Parents/Guardians

Introduction

This Policy explains when and why I collect personal information, how I use it, the conditions under which I may disclose it to others and what choices you have. It relates to all my business activities associated with Kevin Dadswell Tutoring Services that are relevant to Parents and Guardians and their children.

Note: This Policy includes information on the personal information about tutees that I collect as this is very relevant to you as a parent/guardian but if you were to exercise the rights set out in section 4 on their behalf you might need the consent of the tutee.¹

I may change this Policy from time to time so please feel free to request an updated copy occasionally to ensure that you're happy with any changes. When appropriate I will notify you of significant changes. By using my services, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and my privacy practices should be sent by email to tutoring@kevindadswell.com or feel free to speak to me in person if you are a current client

1. Who am I?

I am a self employed tutor providing tuition to students studying KS3, GCSE and A-Level Maths

2. How do I collect information about you?

I collect information about you when:

1. You contact me to enquire about my services
2. You provide additional information during the duration of my tutoring services via email or hard copy e.g. if you email through a school report for a tutee
3. If another parent/guardian provides your contact details to facilitate communications about tuition
4. If you pay online and provide reference information

¹ Apologies that this is vague but the guidance from ICO refers to "competent" children without a specified age limit. 13 years of age is an important threshold in the relevant legislation, though. [See here](#)

I also:

- a) Collate relevant information as tuition progresses e.g. number and dates of lessons, results of tests set for tutees etc.
- b) Occasionally supplement address information from publicly available information if the address information you have provided is incomplete.

3. What information do we collect and how is it used?

I collect data to help me provide a good service to you and help me keep sufficient records to fulfil any relevant legal obligations. The different data I collect and how it is used is set out in the table 3.4.

3.0 Sensitive data

I do not gather sensitive personal data (e.g. health, genetic, biometric data; racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, and criminal convictions). I expressly request that you do not provide any such sensitive data to me in electronic or hardcopy form.

3.1 Children's Information

I collect personal information for the children I tutor to help ensure I provide a relevant and helpful tutoring services. However, I will only collect and store information directly provided by a parent or guardian for children under the age of 16. If I am provided with information directly by children under the age of 16 and I am not sure if consent has been given by the parent/guardian I will notify the relevant parent/guardian.

3.2. Third Parties

I do not sell or rent your information to third parties.

I will not share your information with third parties for marketing purposes.

I use a number of 3rd party services to help me fulfil my contractual obligations - for example, I back up important files on Google Drive and use Gmail for my business email. These 3rd party services are listed in full below.

Should the need to arise to share your personal data with an additional 3rd Party I will inform you, where possible, before this takes place. An example would be if I had to share records with HMRC.

3.2.1 Personal Tutors

For tutees sourced via Personal Tutors I provide Personal Tutors with information on amount of tuition carried out on a monthly basis. This includes siblings not

initially sourced through Personal Tutors. This is achieved via an online form provided by Personal Tutors.

If you found me through Personal Tutors they will have also provided me initially with your contact details and also some details about the tutee (e.g. Name, age and subjects/level required for tuition).

3.2.2 Tutorhunt

If you found me through the Tutorhunt website some of the personal information I have about you and the tutee might initially have come via Tutorhunt depending on what we discussed via the Tutorhunt website before agreeing tuition.

3.3 Data Retention for leads that do not materialise.

If you decide to not commence tuition or I am unable to provide it, I will delete all your personal information and that of the tutee immediately this becomes clear.

3.4 Details of the data I collect

Data Category	Purpose of collection/processing	Legal ground	3 rd Parties shared with	Data Retention
<p>1. Contact information (email/ address/ telephone and mobile numbers)</p> <p>Includes information on relation to tutee (e.g. mother)</p>	<p>To allow initial and ongoing contact with prospects and clients</p> <p>To locate where you live and where I will provide tuition</p>	<p>For Parent/Guardian information:</p> <p>Contract</p> <p>For Tutee information:</p> <p>Legitimate Interest (of parent/guardian in the success of tuition)</p>	<p>Google (use of G Suite for back up and business email)</p> <p>Telephone/mobile providers</p>	<p>For a year after cessation of tuition except where required for accounting/record keeping purposes (see 2) or prospect of further tuition with siblings</p>
<p>2. Contact information (email/telephone/ address/mobile)</p> <p>Includes information on relation to tutee (e.g. mother)</p>	<p>For purchasing/invoicing and record keeping</p>	<p>Legal Obligation</p>	<p>Google (use of G Suite for back up and business email)</p> <p>Telephone/mobile providers</p>	<p>As long as required for accounting purposes (5-7 years)</p>
<p>3. Record of tuition provided and payment</p>	<p>For purchasing/invoicing and record keeping</p>	<p>Legal Obligation</p>	<p>Google (use of G Suite for back up and business email)</p> <p>Personal Tutors (if relevant)</p>	<p>As long as required for accounting purposes (5-7 years)</p>

Data Category	Purpose of collection/processing	Legal ground	3 rd Parties shared with	Data Retention
4. Any additional information supplied before or during tuition to help me provide my tuition services which I have stored electronically.	To enable provision of tuition	For Parent/Guardian information: Contract For Tutee information: Legitimate Interest (of parent/guardian in the success of tuition)	Google (use of G Suite for back up and business email) mobile phone providers (voice mail)	For 6 months after cessation of tuition, longer if recommencement of tuition is anticipated. Outdated/irrelevant information deleted sooner e.g. texts usually deleted same day
5. Tuition details - examples include: questions set, communications with parents/guardians/tutees, recording of tutee performance and activities	To enable provision of tuition/ inform parents	For Parent/Guardian information: Contract For Tutee information: Legitimate Interest (of parent/guardian in the success of tuition)	Google (use of G Suite for back up and business email) mobile phone providers (voice mail)	For 6 months after cessation of tuition, longer if recommencement of tuition is anticipated. Outdated/irrelevant information deleted sooner e.g. texts usually deleted same day
6. Bank details, and any other information provided as part of payment (including email correspondence)	Receipt of payment	Contract	Google (use of G Suite for back up and business email)	For a year after cessation of tuition, longer if recommencement of tuition is anticipated.

Data Category	Purpose of collection/processing	Legal ground	3 rd Parties shared with	Data Retention
7. Personal information on cheques	Receipt of payment	Contract	Santander	Temporary (less than a month)
6. Exam results	For monitoring of my performance and my personal interest in how students perform	For tutee: Legitimate Interest (my interest in how well I am doing as a tutor)	Google (use of G Suite for back up and business email) mobile phone providers (voice mail)	Only for a limited period while I assess how my pupils have done - no longer than 6 months

3.4.1 Extra information on record of tuition and payment (3 in table)

My record of tuition for legal obligation purposes includes the following information:

Pupil Name, date of tuition, subject, level, duration of tuition, fee, method of payment, whether paid and when paid, source of tutee

4 Controlling Your Information

You have certain rights concerning the information I hold about you, as defined under the General Data Protection Regulation. If you wish to exercise these rights, please contact me. A summary of your rights is set out below. For more detailed information you can visit the ICO website [here](#).

4.1. Right to be informed about the collection and use of your personal data

This privacy policy sets out the information I have/will collect about you and how I use it. You can contact me at tutoring@kevindadswell.com should you want more information.

4.2. Right of Access to the personal data that I hold about you

You may request a copy of any data I hold about you. Upon request, I will provide all the personal data I hold on record about you unless there are valid reasons for not doing so.

4.3. Right to rectification

You have a right to ensure that the data I hold about you is accurate and complete. If you change email address, or you believe any of the other information I hold is inaccurate or out of date, please contact me so that I can correct my records.

4.4. Right to erasure

You have the right to request erasure of your personal information. Unless there is a compelling reason for the data not to be erased (for example, if I need to use that data to fulfil my contractual or legal obligations), your personal data will be deleted on request.

4.5. Right to restrict processing

In certain limited circumstances you can request that your data, whilst stored by me, is not used for particular purposes.

4.6 Right to Object

You can object to my use of your personal data and I will respond within a month to state whether I agree with your objection or if I believe I have a compelling reason to continue processing your data.

4.7 Data Portability

You have the right to request that your data is transferred to a third party or yourself in a structured, commonly used and machine readable format. This only applies for data you have provided directly to me.

4.8 Automated decision making

I do not use any personal information for automated decision making or profiling; your data is not subject to automated decision making or profiling. This means that the rights related to this type of activity are not relevant for this Privacy Policy.

5. Security

I take security seriously. In order to protect your information from loss, misuse or unauthorised access or disclosure, I have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information I collect.

These steps include the following:

- Data minimisation
- Encryption of all personal information stored electronically by myself for longer than a week.

6. Complaints

If you wish to raise a complaint on how I have handled your personal information, you can contact me directly and I will investigate the matter.

If you are not satisfied with my response or believe I am not processing your personal information in accordance with the law you can complain to the Information Commissioner's Office (See: <https://ico.org.uk/>).