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Managing Director	Vanessa Leach		01/08/2024
Finance Director	Phil Davies	<i>Phil Davies</i>	01/08/2024

DETAILS OF POLICY UPDATES

DATE	DETAILS
01/06/2024	First draft issued by Evalian Ltd.
01/08/2024	Final version agreed with Evalian Ltd.

Document Release:

This document remains the property of Tute Education Limited. Release to regulatory authorities is permitted as required. Release to other organisations or individuals may only be authorised by Company Directors.

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Introduction

Tute Education Limited (“Tute”, “we”, “us”, “our”), of Halladale House Lakeside, Chester Business Park, Chester, England, CH4 9QT, a company registered in England and Wales, registration number 08176584, is committed to protecting the privacy and security of the Personal Data we collect about website visitors and end customers (“you”, “your”).

The purpose of this privacy notice is to explain what Personal Data we collect about you when you visit our website or use our services. When we do this, we are the Controller of the Personal Data we process, registered in the UK with the Information Commissioner’s Office (“ICO”), registration number ZA097670.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice, you can contact us using the information provided below in the ‘Contact us’ section.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

Personal Data we collect

Tute Education is the business-to-business provider of online tuition services. We may collect the following categories of Personal Data:

- For the provision of our products and services:
 - Title;
 - First name and surname;
 - Job title;
 - Business name;
 - Business email address;

- Business or personal phone numbers;
- Banking information;
- Student name;
- Student UPN;
- Attendance record;
- Audio recordings of lessons; and
- Content of our online chat.

Where we collect it from

We receive information about you directly and from third-party sources including:

- Local Education Authorities;
- Schools or other education establishments

Information about our use of Cookies

We use cookies on our website and web beacons in some emails. Cookies are small text files and web beacons are small graphic images. They are downloaded to your device when you visit a website or receive certain emails, unless you have set your browser to reject them.

To learn more about cookies, please visit <https://www.allaboutcookies.org/>.

Purposes for which we use Personal Data and the legal bases

When providing services to you, we may use your Personal Data for the following purposes and on the following lawful bases:

<u>Purpose</u>	<u>Lawful Basis for Processing</u>

<p>Responding to correspondence from you</p>	<p>It is in our legitimate interest to respond to enquiries made via our website, by email, through our social channels or any other means</p>
<p>Sending you information which may be of interest</p>	<p>If you are an existing customer or have expressed an interest in our products or services, we will rely on legitimate interests to contact you for marketing purposes. You may object to the processing for this purpose by emailing DPO@tute.com</p> <p>If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any time by emailing DPO@tute.com</p>
<p>Provision of our services</p>	<p>Processing is necessary for performance of the contract between us</p>
<p>Business management, forecasting and statistical purposes</p>	<p>It is our legitimate interest to identify areas for managing current business relationships, develop new products and services, and for managing our business</p>
<p>Improving our website and the overall website visitor and user experience</p>	<p>It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our websites</p>
<p>Improving our websites and the overall website visitor and user experience</p>	<p>We use cookies on our websites with your consent, unless they are strictly necessary cookies, in which case your consent is not required</p>

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Sharing your data

It is unlikely we will ever share your Personal Data outside the UK or European Economic Area (the 27 EU member states plus Norway, Iceland and Liechtenstein – “EEA”). If a business need arises and it becomes necessary for us to share your data outside the UK or EEA for the purposes of providing our services to you, we will only share it with organisations in countries which benefit from a UK Adequacy Regulation or similar arrangement, or if not, by using the UK International Data Transfer Agreement, which contractually obliges the recipient to process and protect your Personal Data to the standard expected within the UK.

How long we keep your data

We will retain your Personal Data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your Personal Data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning. Retention periods are detailed within our Personal Data Retention Policy. This information is available upon request.

How we protect your data

We implement appropriate technical and organisational measures to protect data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to in order to further protect your personal information, such as:

- never share One Time Passcodes (OTPs);
- never enter your details after clicking on a link in an email or text message;
- always send confidential information by encrypted email to reduce risk of interception;
- if you are logged into any online service do not leave your computer unattended;
- close down your internet browser once you have logged off;
- never download software or let anyone log on to your computer or devices remotely, during or after a cold call; and
- you can easily identify secure websites by looking at the address in the top of your browser which will begin https:// rather than http://.

Your data protection rights

There are certain fundamental rights that you have in respect of your Personal Data:

<u>Rights</u>	<u>Description</u>
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete
Right to erasure	Individuals have the right to request their personal information to be erased, in certain circumstances

<p>Right to restrict processing</p>	<p>Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular:</p> <ul style="list-style-type: none"> • if your data is not accurate; • if your data has been used unlawfully but you do not want us to delete it; • if your data is no longer needed, but you want us to keep it for use in legal claims; or • if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request
<p>Right to data portability</p>	<p>Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances</p>
<p>Right to object</p>	<p>Individuals have the right to object to the processing of their Personal Data, in certain circumstances</p> <p>Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way</p> <p>Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so</p>

Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
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In addition to the above, an individual also has the following rights:

<u>Rights</u>	<u>Description</u>
Right to withdraw consent	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your personal information with a relevant supervisory authority.

Exercising your data protection rights

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances

Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the details below:

Tute Education Limited

Halladale House Lakeside

Chester Business Park

Chester

CH4 9QT

Alternatively, you can email us at DPO@tute.com.

Raising a complaint with the UK data protection supervisory authority

If you believe that you have exhausted all possible avenues of resolving your data protection concerns with us, you may lodge a complaint with the ICO by calling their Helpline on 0303 123 1113.

You can also send your postal correspondence to:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Alternatively, you can contact them at <https://ico.org.uk/make-a-complaint/>.

Data Protection Officer

We do not have a statutory requirement to appoint a Data Protection Officer ("DPO") under the UK GDPR. However, for accountability and compliance purposes, we have voluntarily appointed [Evalian Limited](#), a company specialising in data protection, cyber security and information security, as our DPO. Evalian Limited can be reached at dpo@evalian.co.uk.