

PRIVACY POLICY

The Privacy Policy For Edinburgh Tutors Ltd

Trading as

Edinburgh Tutors

Glasgow Tutors

Tutors in Aberdeen

Registered Office Maisondieu, Kelso, Scotland TD58JW

SC339201

PRIVACY POLICY

This Privacy Policy applies to Sub-Contractors (Tutors) and Clients and where we collect your data in any form.

Edinburgh Tutors Ltd is committed to protecting privacy of Clients and Sub-Contractors (Tutors) and takes its responsibilities regarding the security information very seriously. This privacy policy explains what personal data we collect about you, how and why we use it, who we disclose it to, and how we protect your privacy.

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PRIVACY POLICY

1. WHO IS RESPONSIBLE FOR YOUR DATA

Our Privacy Policy applies to the personal data that Edinburgh Tutors Ltd collects and uses, trading as Tutoring Brands in the UK such as, but not limited to, the trading brands, Edinburgh Tutors, Glasgow Tutors, Tutors in Aberdeen.

References in this Privacy Policy to Edinburgh Tutors Ltd. Including, Edinburgh Tutors, Glasgow Tutors and Tutors in Aberdeen “we”, “us” or “our” mean Edinburgh Tutors Ltd (a company registered in Scotland, registration no SC339201 and registered office at Maisondieu Kelso TD58JW) the purposes for which your personal data are used by Edinburgh Tutors Ltd and are the “data controller” for the purposes of the UK Data Protection Act 1998, EU General Data Protection Regulation (GDPR), PCI-DSS, and European data protection legislation.

We also comply with the principles of the US Electronic Communications Privacy Act (18 USC §2510) and the Canadian Privacy Act and Personal Information Protection and Electronic Documents Act (PIPEDA).

2. PURPOSE AND LAWFUL BASIS FOR PROCESSING YOUR DATA

We have two purposes for processing your personal data:

- **To sell our products to you and carry out any logistics for delivery or refund of goods or services**

This purpose allows Edinburgh Tutors Ltd to lawfully process your data for legitimate interests.

- **To inform, engage with you about you, products and services**

This purpose allows Edinburgh Tutors Ltd to seek your consent to process your data for communication, education and marketing purposes (GDPR 1). Without your explicit consent, Edinburgh Tutors Ltd will not process your data for this purpose.

The purpose and lawful basis for processing your data may change from time to time, where this policy will be updated.

3. CONSENT

Your consent will be an explicit action from 25th May 2018. Because of the need for consent we will not use defaulted opt-in checkboxes or include your personal data for communication and marketing purposes where you have asked only for a transactional email (receipts, proof of delivery etc...).

We will keep your given consent on file for a period of up to 5 years from the last change before checking if your consent is still valid. This is in line with our average customer tutoring cycle. We will not contact you if you have withdrawn consent, but you can grant or withdraw your consent at any time by email, or phone call admin@realtimetutors.co.uk or phone 0131 581 8668

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We will also include the opportunity to unsubscribe or withdraw consent on all marketing emails.

4. PERSONAL DATA WE COLLECT ABOUT YOU

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name, your contact details, information relating to your purchase (e.g. your order references) or information on how you use our website, how you interact with us.

We collect some personal data from you, for example when you purchase from us, use our website or other electronic communication means such as an app or social media, use our services or contact us. We may also receive your personal data from our suppliers or whom we act as agents for who provide services to you or our partners when you show interest in our products through them.

Categories of data we collect

We may collect and process the following categories of information about you:

CATEGORY OF DATA COLLECTED / HELD	WHEN WE PROCESS SUCH DATA
name and surname and your contact details (email address, telephone number and postal address)	When you create an account on our website When you purchase our products or services When you engage one of our tutors for whom we act as agents When you take part in our competitions. When you complete any of our questionnaires When you choose an offer we make available on our website When we undertake market research when you have consented to be included in phone, email or workshop surveys
Information about your transaction, including your payment card details. This through our service provider PayPal UK Ltd	When you purchase our products or services
Information about your purchases of our partners’ products and services	When you purchase such products or services
The communications you exchange with us (for example, your emails, letters, calls.	When you contact Edinburgh Tutors Ltd or you are contacted by us
Your social media account ID	When you interact with us on social media When we target social media posts

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Your posts and messages on social media directed to Edinburgh Tutors Ltd	When you interact with us on social media
Your feedback	When you reply to our requests for feedback or participate in our customer surveys
Your preferred services with us e.g. History Tuition Nat 5	When you choose to provide this information while completing an enquiry form, creating an account or through managing your preferences
Information about how you use our website or our Social Media , such as your searches for products	When you navigate on our website or when you use our mobile app

Sensitive personal data - We do not collect this data

Information that could reveal your racial or ethnic origin, physical or mental health, religious beliefs or alleged commission or conviction of criminal offences is considered “sensitive personal data” under the UK Data Protection Act 1998 and other data protection laws.

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5. HOW AND WHY WE USE YOUR PERSONAL DATA

We use your personal data for the following purposes:

- **To manage your orders and provide our services to you**
When you purchase from us, or seek advice, we use your information to perform our services in relation to your purchase or enquiry, for example to provide you with tutors, tailor specific advice to your needs or change bookings for appointments.
- **To communicate with you and manage our relationship with you**
Occasionally we may need to contact you by email and/or telephone for administrative or operational reasons, for example in order to send you confirmation of your purchases and your payments, to inform you about your tutor appointments, to notify you when back ordered products are available or to advise you of disruption and changes to your appointments and deliveries.

Please be aware that these communications are not made for marketing purposes and as such, you will continue to receive them even if you opt-out from receiving marketing communications.

We will also use your personal data if we contact you after you have sent us a request, filled in a web-form through our website or contacted us on social media.

Your opinion is very important to us, so we may send you an email or SMS to seek your feedback.

We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you as our customer and to improve our services and experiences for customers.

- **To personalise and improve your customer experience**
We may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience. For example, if you inform us about your preferred subjects, or level we will be able to send you tips and ideas relevant to your areas of interest/study.

We may also collect information on how you use our website, which pages of our website you visit most, which subjects you search for and what services you buy, in order to understand what you like. We may use this information to tailor the content and offers that you see on our website and, if you have agreed to receiving marketing communications, to send you relevant messages that we think you like.

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If you are in the process of making a purchase under your account and you leave our website before your order has been placed, we may contact you in order to help you easily complete your purchase.

- **To inform you about our news and offers that you may like** We may send you marketing communications, if you have indicated that you are happy to receive these, for example when you create an account on our website or purchase from us and you explicitly agree to receive such communications. You can also request us to send you marketing communications through managing your preferences in your account.

If you are happy to receive marketing communications, we will provide you with news from us such as new products that you may be interested in or services that you may like.

In addition, if you are happy to receive marketing communications, we may send you communications promoting our partners' products and services that may be related with your purchase history.

Please note that we do not share your contact details and other personal data with other companies for marketing purposes, unless we have obtained your consent to do so.

If you do not want to receive marketing communications from us, you can simply tell us so by clicking the relevant box before confirming your booking. You can also choose to opt out from receiving marketing communications at any time, by clicking on the relevant unsubscribe link at the bottom of any marketing related email you may receive from us.

If you have a Edinburgh Tutors Ltd online account, you can easily manage your marketing preferences through your account and you can at any time opt out from receiving marketing communications.

If you prefer, you can also call our Customer Service team and express your preference to not receive marketing communications (Tel. +44 131 581 8668) or send an email to admin@realtimetutors.co.uk with the header "Unsubscribe". We ask that you allow 28 working days to complete any unsubscribe request.

- **To improve our services, fulfil our administrative purposes and protect our business interests** The business purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, fraud screening, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development.
- **To comply with our legal obligations**, for example, our obligation to provide your information to local police agencies.

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6. REQUESTING ACCESS TO YOUR PERSONAL DATA

You have a right to request access to the personal data that we hold about you. This could include purchase information relating to products and services. If you have questions in relation to your personal data, please contact us at: admin@realtimetutors.co.uk

7. RIGHT TO BE FORGOTTEN

You have a right to be forgotten and have data erased and / or stop being processed where the personal data is no longer necessary for the purpose of collection, you withdraw consent, when you object to the processing or to comply with a legal obligation.

We will not erase your records as we need to maintain your transactional data for our legal obligations to the local tax and revenue authorities.

We have a number of security and governance protections in place that will be excluded from your right to be forgotten:

- **Encrypted system backups, held for up to 10 years.** It is practically impossible to alter these backup files
- **Our anti-spam and email software.** We maintain email archiving for security reasons, and your info may be kept in this archive..

If you have questions in relation to your personal data, please contact us at:
info@realtimetutors.co.uk.

8. RIGHT TO RESTRICT PROCESSING

You have a right for your personal data to be stored but not processed. This is achieved through the withdrawal of consent.

If you have questions in relation to your personal data, please contact us at:
info@realtimetutors.co.uk.

9. RIGHTS RELATED TO AUTOMATED DECISION MAKING INCLUDING PROFILING

You have a right to be excluded from automated decision making. Edinburgh Tutors Ltd have a number of different customer and consumer types who we personalise experiences for. These include home decorators, interior designers, professional painter and decorators, stockist owners and more. Our personalisation of your experience is achieved through automating profiling based on purchase behaviours and information shared.

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You can select your preference at our contact preference centre, but opting out of this, you will not be able to receive any personalised inspiration or communications.

If you have questions in relation to your personal data, please contact us at admin@realtimetutors.co.uk

10. SECURITY OF YOUR PERSONAL DATA

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data. When you provide your personal data through our website, this information is transmitted across the internet securely using high-grade encryption.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where Edinburgh Tutors Ltd discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however, in some instances we may be compelled by law to disclose your personal data to a third party, such as local police agencies, and have limited control over how it is protected by that party.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party. We may also allow access to your information by other third parties who act for us for the purposes described in this Privacy Policy or for other purposes approved by you. Your personal data may be accessed by and processed outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, also referred to as the "EEA") - including by staff operating outside the EEA who work for us or for one of our suppliers or agents (this includes staff engaged in, among other things, the fulfilment of your booking and the provision of support services). Where your personal data are transferred outside of the EEA, we require that appropriate safeguards are in place.

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Policy or in order to comply with the law, but for a period no more than 10 years.

11. COOKIES OR OTHER TRACKING TECHNOLOGIES

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website and app, we may use technologies, such as cookies, pixels or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. This software does not enable us to collect any personal data. In addition, in order to

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understand how our customers interact with the emails and the content that we send, we use pixels that allow us to know if the emails we send are opened or if the content of our emails is displayed in text or html form.

We also use cookies in our website, and in our emails. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our website or app and allow us to provide features such as remembering aspects of your last flight search to make subsequent searches faster. You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our website or app, most of the features will be still accessible without cookies. For more information on how we use cookies and how you can remove them, read our Cookie Policy.

12. SHARING YOUR PERSONAL DATA

Your personal data may be shared with other companies within our Group. It may also be disclosed to a third party who acquires us, a member of our Group or substantially all of our assets.

We may also share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- **Suppliers providing services to us in order to help us run our business and improve our services and your customer experience.** We may for example share your personal data with Tutors. We may also disclose your information to the companies who help us get your feedback on our services
- **Credit and debit card companies**

Edinburgh Tutors Ltd shares some of your personal data, which includes information about your method of payment and purchase value, to the credit or debit card company that issued the card you used to make your booking. In order to ensure the security of your transactions and prevent or detect fraudulent transactions, we may also share your information with our fraud screening partner.

- **Authorities**
We may disclose your personal data when this is required by the law of any jurisdiction to which Edinburgh Tutors Ltd may be subject.

Through our website we provide links to third party websites which are subject to separate Privacy Policies. Please be aware that this Privacy Policy does not apply to such websites and Edinburgh Tutors Ltd is not responsible for your information that third parties may collect through these websites.

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13. UPDATES TO OUR PRIVACY POLICY

We may make changes to this Privacy Policy from time to time we will update the Privacy Policy and we will publish on our website any new version of this Policy.

14. CONTACT INFORMATION

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to;

alicja@edinburghtutors.co.uk