



**THE GOLDEN
CIRCLE**

Privacy Policy
Last updated: 01/03/21

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The Golden Circle (“us”, “we”, “the organisation”) is committed to protecting and respecting your privacy. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this Privacy Policy.

What this policy covers

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Policy also explains your privacy rights.

‘Personal data’ means any information relating to an identified or identifiable natural person, including an identification number, location data, an online identifier or one or more factors specific to the physical, genetic, mental, economic, cultural, or social identity of that natural person.

For the purposes of this Privacy Policy, the General Data Protection Regulation (“**GDPR**”) and the Data Protection Act (“**DPA**”) 2018, the data controller is Golden Circle Tuition Limited, of 69 Lombard Wharf, 12 Lombard Road, London, SW11 3FU.

The types of information we collect and why we collect it

To provide our tuition services, we collect, store and process personal data.

When you engage with us, for example by corresponding with us, working with us as a tutor or partner, applying to be a tutor with us or by receiving our services, including as a child receiving our services, we will collect and process personal data about you that you have provided. This personal data may include your name, e-mail address, postal address, phone number, and date of birth. If you are working with us as a tutor, we will also collect academic transcripts or certificates, Disclosure and Barring Service (“**DBS**”) certificates and certificate information, proof of address, proof of identification, proof of name change and bank details.

We may collect details of your visits to our website, including collecting the personal data and information set out in the ‘Cookies’ section below. We may also receive personal data and information about you from third parties, including, for example, public sources, business partners, analytics providers, payment and delivery services and search information providers.

For clients, we collect the following data: name, email address, phone number, address, their child’s name, school year and educational background. We may receive personal data relating to the children

we provide services to from local authorities, special education needs and disability (“SEND”) coordinators, social workers, parents, guardians and/or schools.

How we will use your personal data

We will only use your personal data when the law allows us to and for the purpose for which it has been provided.

The legal basis for processing your personal data includes one or more of the following:

- processing is necessary for the performance of a contract with you, or in order to take steps at your request, prior to entering into a contract;
- processing is necessary for compliance with a legal obligation;
- processing is necessary in order to protect your vital interests or another person’s;
- processing is necessary for the purposes of our (or a third party’s legitimate interests);
- consent.

We note that consent may be withdrawn at any time.

You may only consent to us holding and processing personal data relating to a child under the age of 13, who cannot give such consent themselves, if you hold parental responsibility for the child. By giving us consent to process personal data relating to a child under the age of 13 you are declaring that you hold parental responsibility for that child. We will make reasonable efforts to verify this.

We process your personal data for the purposes of the following legitimate interests of our organisation, affiliated parties and non-affiliated parties:

- to provide you with information and services which you have requested from us or to provide you with information which is similar to that you have already enquired about;
- to allow you to participate in providing our services;
- to administer, monitor and improve our services;
- to administer, improve and help secure our website and for internal operations; and
- to notify you about changes to our services.

We will combine information we receive from other sources with information you give to us and will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We may process personal data about criminal convictions or offences which is obtained from the DBS. We process such data in order to ensure the safeguarding of children and individuals at risk pursuant to Schedule 1 of the DPA 2018.

Sharing information with third parties

Clients

After clients have registered with us, we share the broad requirements of the assignment on a no names basis with our tutors so that relevant tutors can apply for the job. If a tutor applies for a job, The Golden Circle sends a brief description of the tutor's profile to the client. If a client chooses to proceed with a tutor, we pass on the specific student details. Other than sharing information with our tutors and the tutor management system provider (Tutorcruncher) we keep personal information confidential and do not pass it on to any third parties unless we are required to do so by law.

Tutors

The information provided to The Golden Circle forms the basis of a tutor profile. This includes the following information: a photograph, subjects taught, teaching experience and personal biography. This profile is published on The Golden Circle website following tutor approval. We pass on contact details to clients for jobs applied for. Other than sharing information with clients and our tutor management system provider (Tutorcruncher) we keep personal information confidential and do not pass it on to any third parties unless we are required to do so by law.

We may share personal data relating to tutors with schools or local authorities with whom we work for child safeguarding and operational purposes. Such information may include tutors' names, e-mail addresses, phone numbers and DBS certificate numbers. In accordance with section 124 of the Police Act 1997, DBS certificate information is only passed to those who are authorised to receive it in the course of their duties.

We do not use any personal data for marketing, market research or commercial purposes.

Retention of personal data

We take every precaution to ensure that information is kept safe and protected from unauthorised access. Information will only be kept for a commercially reasonable period of time for the purposes stated in this policy.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. We do not store any IP addresses.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. This may prevent you from taking full advantage of our website.

Please note that external sites that we may link to may also use cookies, over which we have no control.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

Your rights

If you wish to exercise any of your rights, as listed below, please write to us at contactus@goldencircletutors.co.uk :

- access to your personal data;
- objection to processing of your personal data;
- objection to automated decision-making and profiling;
- restriction of processing of your personal data;
- your personal data portability;
- rectification of your personal data; and
- erasure of your personal data.

If you make a request relating to any of the rights listed above, we will consider each such request in accordance with all applicable data protection laws and regulations. In some cases, these rights are subject to conditions and limitations.

Updates or changes to the Privacy Policy

We reserve the right to make changes to this Privacy Policy. Each time you visit this site you should check this Privacy Policy to verify that no changes have been made to any sections that are important to you and to ensure that you are happy with any changes. This Privacy Policy was last updated on 01/03/2021.

Complaints

You also have the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Data privacy contact

Questions, comments, and requests regarding this Privacy Policy are welcomed and should be addressed to Hannah Titley, hannah@goldencircletutors.co.uk