

PRIVACY POLICY

This privacy policy, in conformance with the GDPR, describes how we collect, use, process and share your personal information when you use our website and services.

HOW/WHY WE USE YOUR PERSONAL DATA

We use your personal information in the following ways to fulfil our contractual obligations to you and for our legitimate business interest:

- Provide our services;
- Process your payments;
- Understand how our services are used, so that we may further develop and improve them;
- Understand how our Learning Platform is used, so as to optimise its performance;
- Send marketing information by email (with your consent) to promote additional services;
- Keep system logs for operation and maintenance purposes;
- Keep our systems secure;
- Keep such records as we are required to do by law.

HOW WE COLLECT YOUR DATA

We collect and process personal information from you, when you:

- Visit our website;
- Contact us by phone;
- Email or use our web forms to enquire about or register for our services;
- Interact with our Learning Platform;
- Respond to or participate in any survey or questionnaire sent by us, or;
- Make a purchase through the website.

DATA YOU PROVIDE TO US

Enquiries:

We collect information you provide when you make an enquiry to us by phone, email, web forms on our website, and in our responses and subsequent correspondence. This information may include your name, contact details, age, nationality, country of residence, and details of your enquiry.

Key Stage Registrations:

When you register for a Key Stage, we store the information you provide in your and your child's application form and in correspondence. This may include any or all of the following:

- Full name;
- Date of birth;
- Email address;
- Address;
- Nationality;
- Interests and activities you provide as being relevant to planning your child's studies;
- Preferred method of payment;
- Academic history (where needed);
- Confirmation of parental responsibility.

Where someone else is helping a student under 18 we store their name, contact email address and relationship to the child.

We may store special categories of sensitive data such as race, ethnicity, religious beliefs or health where provided to us as relevant to your or your child's studies.

Website content: Comment or content you may submit such as essays, assignments, competition entries, feedback and photographs that we may feature with your consent on our web site.

DATA WE COLLECT FROM YOU

When you use our online services such as visiting our website, completing our web forms and/or using our Learning Platform, we collect technical information. This may include:

- Your IP address;
- Date and time of sign up or form submission;
- Unique device identifiers;
- Country location;

- Browser type;
- Operating system;
- Information about how visitors use our website.
- The results of your child's progress to generate national averages.

We do not link data collected by our website and Learning Platform to any other information we hold to identify any individual visitor.

Our website uses cookies to collect information about how the website is used. Cookies are data stored on your hard disk by your web browser. Information gathered through cookies and our web server logs may include the date and time of visits to the website, the pages viewed, the time spent, and the websites visited just before and just after the website. **None of this information is personally associated with you.** And you may choose to disable cookies on your computer by going to the preferences menu in your web browser. However, it is possible that some parts of the website will not operate correctly if you disable cookies. If you visit the website and volunteer personal data, you may modify, update or delete such data at any time.

We do not have any control over how third party sites collect data, and if you choose to follow these links please read the privacy notices of the sites you link to.

HOW WE SHARE YOUR DATA

We may disclose your personal information to other data controllers and with our trusted suppliers in order to provide our services to you.

To provide our services:

We share the name and email address of enrolled students and, where relevant their parents/guardians with our learning management system partner, Digitalkonnector, to create Student and Parent Observer accounts to fulfil our contract to you to provide courses.

To process payments: We use GoCardless to process online payments. Stripe provide us with details of payments made including name, service, date and amount. They do not share your billing information with us. Stripe are the data controller of information provided to them via our web forms. You can see their privacy policy [here](#).

To provide our services: We work with third-party companies who support our website for payment processing, accounting, marketing and other services which

may require them to access information about you. If a service provider needs to access our client's personal information to perform services on our behalf, they do so under our instructions. We do not share your information with third parties for their own purposes.

RECIPIENTS OF PERSONAL DATA

We may disclose your personal information:

- If we are under a duty to do so to comply with any legal obligation;
- In order to enforce or apply our terms and other agreements;
- To protect our rights or property;
- To protect the safety of our clients including with healthcare, social and welfare advisors and with central and local government.

If we sell, transfer, or merge our business or assets in future and, as a result, share your data with other parties, they may use your data in the same way as set out in this notice. If your data becomes subject to a different privacy policy we will contact you in advance.

LAWFUL BASIS FOR PROCESSING

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

- Where we have your consent;
- Where necessary to perform a contract with you;
- When it is our legal duty;
- Where processing your personal information is in our legitimate interest as long as this is not overridden by your rights and your information is processed in a way that you would reasonably expect. Our legitimate interest is that that the processing is necessary for us to provide the information or services that you have requested or purchased and to improve or promote them.

Sensitive personal information such as religion, race, ethnicity, political beliefs or health information such as learning abilities is classed as Special Category Data under the GDPR. Our legal basis for processing is our legitimate interest which is to provide you with advice and guidance in relation to a registration or during the course of studies. Your interest is that you have provided this information for this limited purpose. We may only process this information if you have also given us your

consent. We ask that you only provide such information on registrations and during the course of studies where you give us consent to collect it.

YOUR RIGHTS

You have the following rights over the processing and use of your personal data. To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this privacy policy. If you have authorised a third party to submit a request on your behalf, we will ask them to show that they have your permission to act.

Withdrawing your consent:

Where you have given us your consent to use your personal data, you have the right to withdraw your consent at any time by writing to us at the email address below.

Access to your data:

Please contact us at the email address below if you want us to tell you about any data we hold about you or to request a copy by making a Subject Access Request.

Correcting your data:

Please contact us at the email address below if your data is incorrect, out of date or incomplete and we will take reasonable steps to correct it.

Restricting use of your data:

You have the right to object to our use of your personal information where we are relying on our legitimate interest to process it. If you object we must stop processing it unless we believe we have a legitimate overriding reason to do so. You have the right to ask us to delete your personal information. We may need to keep your data due to a legal obligation but may be able to restrict the use of your data so that it may only be used for legitimate reasons such as legal. In this situation, we would not use or share your information in other ways while it is restricted. If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us at the email address below.

Portability: Where we are processing information that you have provided to us with your consent or to fulfil a contract with you, you have the right to ask us for a copy to be sent to you or another organisation in a format that can be easily reused. Please contact us to request this at the email address below.

DATA RETENTION

We retain personal information we have collected for as long as necessary to fulfil the purposes of providing the services you have purchased, and for our legitimate business needs to respond to any questions or complaints, and to maintain our business records as required by law. When we no longer have a legitimate business need to process your personal information, we will delete or anonymise it. If this is not possible (for example, because your personal information has been stored in backup archives) we will prevent any further processing and store it securely until deletion is possible. Our learning management system partner DigitalKonnecter will keep all student and parent information they have processed for as long as we have an account with them and you may request a copy of this at any time, it may be deleted on request. Each data controller with whom we work will keep information according to their own retention schedules. You can check their privacy policies at the links provided above.

COMPLAINTS

If you have any complaints regarding this policy notice or requests for further information, please write to us by email and we will work with you to resolve, quickly and fairly any complaint you may have. If you have any complaints that we are not able to answer, or if you have any concerns about the way that your data is being handled you should contact the Information Commissioner's Office: **Phone:** 0303 123 1113 **Website:** [Information Commissioner's Office](https://www.informationcommissioner.gov.uk)

CONTACT US

Please contact us if you have any questions that have not been answered in our privacy policy.

Email: dataprivacy@one1onehomeschooling.co.uk

Last Updated: August 2019