



Principia Parva Tutoring
Bringing dead languages to life



Principia Parva Tutoring customer privacy notice

This privacy notice tells you what to expect us to do with your personal information. By requesting or using our services, you consent to our use of your personal information as outlined in this notice.

Contact details

Telephone

+44 1223 926092

Email

privacy@principiaparva.co.uk

What information we collect, use, and why

We collect or use the following information **for student education and welfare**:

- Names and contact details for students
- Names and contact details for carers of students who are under 18 at the commencement of tuition
- Gender
- Pronoun preferences
- Date of birth
- Payment details and financial information including transactions
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data

- Exam results and qualifications
- Progress reports
- Marksheets
- Copies of classwork, homework and assessments
- Teachers' lesson notes and records of homework tasks
- Information provided by the student or carer regarding academic background, goals and learning preferences
- Information relating to compliments and complaints
- Recordings of online lessons with students under the age of 18

We also collect or use the following information **for student education and welfare**:

- Health information (GP contact details and details of allergies and relevant medical conditions for in-person students only)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account login or user information
- Purchase or service history
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data

- Copies of client contracts and forms

We also collect the following information for **dealing with queries, complaints or claims**:

- Health information (GP contact details and details of allergies and relevant medical conditions for in-person students only)

We collect or use the following information **for information updates or marketing purposes**:

- Names and contact details
- Marketing preferences
- Website and app user journey information
- Records of consent, where appropriate
- Alumni records

We collect or use the following information **for archiving purposes**:

- Names and contact details
- Addresses
- Alumni records

We collect or use the following information **to comply with legal requirements**:

- Health and safety information
- Accounting and tax records
- Copies of client contracts and associated documents such as consent forms and new student details forms

Lawful bases and data protection rights

Under UK data protection law, we must have a 'lawful basis' for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website at <https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#roa>:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure** - You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
- **Your right to object to processing** - You have the right to object to the processing of your personal data.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **for student education and welfare** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We collect and use personal information to enable us to design and deliver tailored courses of tuition and to monitor student performance.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information **for information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information **for archiving purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- Parents or carers

How long we keep information

Data Type	Retention Period	Reason
Personal info (potential students who do not enter into a course of tuition)	12 months after the last interaction	Allows for follow-up/ re-engagement if you change your mind.
Personal info and educational records (enrolled students)	3-5 years after ceasing tuition	In case of possible re-engagement after a break, student record requests, or questions or disputes that arise after tuition ends.
Recordings of online lessons with students under the age of 18	1 year in the case of an ongoing tutorial relationship, or 6 months following cessation of tuition for the student(s) in question	For the purposes of online safety and quality assurance, in line with the child protection and safeguarding recommendations of The Tutors' Association (see TTA Code of Practice at https://thetutorsassociation.org.uk/membership/code-of-practice/)
Contracts, legal documents and forms	As long as any term(s) of the contract remain in force and for 6-7 years thereafter	To deal with potential disputes or claims.
Marketing and consent records	Until consent is withdrawn + 5 years post-withdrawal	Compliance with GDPR and proof of consent.
Complaints and incident reports	3-6 years, depending on severity	Ensures records are available for any disputes or claims.
Accounting and tax records	As required by applicable legislation in force from time to time. Usually 6-7 years for general accounting records, up to 20 years for records relating to more complex matters that may be subject to extended investigation.	Compliance with applicable laws, regulations and requirements of HMRC and other bodies.

Who we share information with

Data processors

Brightbook

This data processor does the following activities for us: they produce our invoices and maintain our accounting records

Zoom

This data processor does the following activities for us: they provide communication and video conferencing services

Microsoft

This data processor does the following activities for us: they provide computing services including cloud storage

Protonmail

This data processor does the following activities for us: they provide email services

Wix

This data processor does the following activities for us: they provide website hosting and related services

Others we share personal information with

- Parents and carers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Legal bodies or authorities
- Organisations we're legally obliged to share personal information with

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Microsoft

Category of recipient: provider of computing services including cloud storage

Country the personal information is sent to: the United States, the EU and other jurisdictions where Microsoft or its subcontractors operate

How the transfer complies with UK data protection law: We rely on appropriate safeguards, including Standard Contractual Clauses, to ensure that personal data is protected when transferred outside the UK

Organisation name: Wix

Category of recipient: website hosting and related services

Country the personal information is sent to: Israel, the United States, and other jurisdictions where Wix or its service providers operate

How the transfer complies with UK data protection law: We rely on appropriate safeguards, such as Israel's adequacy decision and Standard Contractual Clauses, to ensure that personal data is protected when transferred outside the UK.

Organisation name: Zoom

Category of recipient: communication and video conferencing provider

Country the personal information is sent to: the United States and other jurisdictions where Zoom or its service providers operate.

How the transfer complies with UK data protection law: We rely on appropriate safeguards, including Standard Contractual Clauses, to ensure that personal data is protected when transferred outside the UK

Organisation name: Protonmail

Category of recipient: email services

Country the personal information is sent to: Switzerland and other jurisdictions where ProtonMail or its service providers operate

How the transfer complies with UK data protection law: We rely on appropriate safeguards, including Switzerland's adequacy decision and Standard Contractual Clauses, to ensure that personal data is protected when transferred outside the UK.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last updated

27 September 2024