



Admissions Tutors

Privacy Policy

For the purpose of this Policy, 'Admissions Tutors', 'we' and the 'company' will refer to Admissions Tutors Ltd.

1. **Introduction**

- We are committed to safeguarding the privacy of our clients and visitors to our website.
- This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- We use cookies on our website. You will be asked for your consent to the use of cookies when first you visit our website.
- In this policy, "we", "us" and "our" refer to Admissions Tutors Ltd, its employees and selected contractors authorised to act as data controllers on behalf of Admissions Tutors.

2. **Credit**

- This document was created using a template from SEQ Legal (<https://seqlegal.com>).

3. **How we use your personal data**

- In this Section 3 we have set out:
 1. the general categories of personal data that we may process;
 2. the purposes for which we may process personal data; and
 3. the legal bases of the processing.
- We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use of our website or services. The source of the usage data is Google Analytics. This usage data may be processed for the purposes of analysing the use of our website and services. The legal basis for this processing is the legitimate interest of our agency, namely the monitoring and improvement of our website and services.
- We may process information needed to set up and maintain an account with our agency, in order to provide you with our services ("**account data**"). This account data may include your name and email address. The source of the account data is the information you provide. The account data may be processed for the purposes of, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal bases for this processing is to allow the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- We may process information to be included in your personal client profile on our website ("**profile data**"). This profile data may include your name,





address, telephone number, email address, profile pictures, gender, date of birth, educational details and employment details. Profile data may be processed for the purposes of enabling your use of our services. The legal basis for this processing is to allow the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- We may process your personal data that are provided in the course of the use of our services (“**service data**”). This service data may include information about your academic performance and any factors relevant to this, your current, past or future academic institutions, your availability for tuition sessions, your preferred tuition location, and your experience or qualifications. We gather this information directly from you. Service data may be processed for the purpose of effectively providing our services. The legal basis for this processing is to facilitate the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- We may process information that you post for publication on our website or through our services (“**publication data**”). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent.
- We may process information contained in any enquiry you submit to us regarding our services (“**enquiry data**”). Enquiry data may be processed for the purposes of offering or providing relevant services to you. The legal basis for this processing is the legitimate interest of our agency, namely to respond to enquiries concerning our services and to make our services available to potential clients.
- We may process information relating to our customer relationships, including customer contact information (“**customer relationship data**”). The customer relationship data may include your name, your contact details, and information contained in communications between us and you. The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our services to customers. The legal basis for this processing is the legitimate interest of our agency, namely the proper management of our customer relationships.
- We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website (“**transaction data**”). Transaction data may include your contact details, details of the payment method used, including details of specific payment cards, your billing address, and the details of the transaction itself. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- We may process information that you provide to us for the purpose of subscribing to our email notifications (“**notification data**”). The notification data may be processed for the purposes of sending you the relevant notifications. The legal basis for this processing is the legitimate interests of





our agency, namely the need to inform clients of relevant developments in relation to their use of our services, for example any charges to be levied in respect of those services.

- We may process information that you provide to us for the purpose of subscribing to our email newsletters, and/or promotional information (“**marketing data**”). This marketing data may be processed for the purposes of sending you the relevant newsletters. The legal basis for this processing is consent.
- We may process information contained in or relating to any communication that you send to us (“**correspondence data**”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- We may process personal data belonging to certain ‘special categories’ as defined under the European Union’s General Data Protection Regulation. This data may include your ethnicity, religious views, and state of health, both physical and mental.][The source of this data is you, the data subject.] This data may be processed for the purposes of more accurately and effectively providing our services, and only insofar as it is necessary to achieve those purposes. The legal basis for this processing is consent, and the essential purpose of processing is the provision of confidential advice.
- We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risk.
- In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data] where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- Please do not supply any other person’s personal data to us, unless we prompt you to do so.

4. **Providing your personal data to others**

- We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.





- We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- We may disclose all or any of the personal data set out in Section 3. to our data processors, Tutor Cruncher, <https://tutorcruncher.com/> in order to fulfil the purposes set out in Section 3.
- We may disclose enquiry data, profile data, service data or correspondence data to another or multiple clients of our agency insofar as reasonably necessary to effect an introduction between tutor and student for the purposes of arranging tuition, and to facilitate and administer that relationship, and to assist in the performance of the contract between tutor and student. The legal basis for this is the legitimate interest of our agency, namely the provision of our services.
- Financial transactions relating to our website and services may be handled by our payment services provider [Stripe](https://stripe.com), <https://stripe.com>. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices on their websites, via the links above.
- We may disclose your profile and service data to certain third parties, namely the other parties in any tuition arrangement administered by our agency on your behalf, or to prospective parties, for the purpose of enabling them to contact you, and to allow you to enter into and meet the obligations of a contractual relationship. Each such third party will act as a data controller in relation to the data that we supply to it, insofar as this is appropriate.
- We may disclose your transaction data to our accountant(s) for the purpose of enabling them to manage our financial records. This third party will act as a data controller in relation to the data that we supply to it.
- In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- Our website usage analytics provider, Google Analytics, is situated in the USA. The European Commission has made an "adequacy decision" with respect to the data protection laws of the USA. Transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- Our preferred Social Media platform, Facebook, is situated in the USA. The European Commission has made an "adequacy decision" with respect to the data protection laws of the USA. Transfers to the USA will be protected by





appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

- You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. **Retaining and deleting personal data**

- This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- We will retain your personal data as follows:
 1. account data, profile data, service and customer relationship data will be retained for a minimum period of one year from the time of the receipt of this data, and for a maximum period of six years from the end of the period in which the client is in receipt of Admissions Tutors' services.
- In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
 1. the period of retention of correspondence, usage, transaction and notification data will be determined based on their likely relevance to future reviews of company processes, or legal proceedings.
 2. the period of retention of publication data will be determined based on the period of time for which this data is intended to remain in publication.
 3. the period of retention of enquiry data will be determined based on the likelihood of an enquiry resulting in the provision of services to the data subject.
- Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. **Amendments**

- We may update this policy from time to time by publishing a new version on our website.
- You should check this page occasionally to ensure you are happy with any changes to this policy.
- We may notify you of changes significant changes to this policy by email.

8. **Your rights**

- In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- Your principal rights under data protection law are:





1. the right to access;
 2. the right to rectification;
 3. the right to erasure;
 4. the right to restrict processing;
 5. the right to object to processing;
 6. the right to data portability;
 7. the right to complain to a supervisory authority; and
 8. the right to withdraw consent.
- You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by visiting <https://secure.tutorcruncher.com/> and logging into your personal client account.
 - You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. You may make such amendments yourself by visiting <https://secure.tutorcruncher.com/> and logging into your personal client account.
 - In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
 - In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
 - You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any





official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

- You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- To the extent that the legal basis for our processing of your personal data is:
 1. consent; or
 2. that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- You may exercise any of your rights in relation to your personal data by written notice to us, specifically via email to info@admissionstutors.com, in addition to the other methods specified in this Section 8.

9. **About cookies**

- A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.





10. Cookies that we use

- We use cookies for the following purposes:
 1. advertising – we use cookies to help us to display advertisements that will be relevant to you. Cookies used for this purpose are: Google AdWords.
 2. analysis – we use cookies to help us to analyse the use and performance of our website and services. Cookies used for this purpose are: Google Analytics Tracking Code and Facebook Pixel.

11. Cookies used by our service providers

- Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: Google Analytics Tracking Code.
- We use Tutor Cruncher to manage our user database. This service uses cookies for the purpose of analysis of the use and performance of their platform and service. You can view the privacy policy of this service provider at <https://secure.tutorcruncher.com/terms/>

12. Managing cookies

- Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 1. <https://support.google.com/chrome/answer/95647> (Chrome);
 2. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 3. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 4. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 5. <https://support.apple.com/en-us/HT201265> (Safari); and
 6. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- Blocking all cookies will have a negative impact upon the usability of many websites.
- If you block cookies, you will not be able to use all the features on our website.

13. Our details

- The website <https://www.admissionstutors.com> is owned and operated by Admissions Tutors Ltd.
- We are registered in England and Wales under registration number 12929942, with the registered address 71-75 Shelton Street, London, WC2H 9JQ.
- You can contact us by email, using info@admissionstutors.com

