# **ACE Tuition Harpenden**

# Privacy Policy

ACE Tuition Harpenden ("we", "our" or "ACE Tuition") is committed to protecting and respecting the privacy of all visitors to our website: acetuitionharpenden.co.uk and all visitors who access our website or services through any mobile application (together, "website"). This 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. By visiting our website, you are accepting and consenting to the practices described in this policy. For the purpose of the Data Protection Act 2018, and the General Data Protection Regulation (GDPR), the data controller is Amy Salem at ACE Tuition.

Please read the following privacy policy which explains how we use and protect your ("you" or "your" refer to any user) information. We reserve the right to modify this notice without notice by posting any changes on our website.

When you use the ACE Tuition website, we automatically collect personal information about the services you use and how you use them.

#### Information that we collect

In running and maintaining our website we may collect and process the following data about you:

 Information about your use of our site including details of your visits such as pages viewed and the resources that you accessed. Such information includes traffic data, location data and other communication data;

- Information provided voluntarily by you. For example, when you register for information or communicate through the site, or when you contact us by email or telephone;
- Technical information used to identify you, such as login information, your IP address and the browser used to access the site.

# What we do with the information we gather

We require this information to understand your needs and provide you with a better service and, in particular, for the following reasons:

- Internal record keeping;
- We may use the information to improve our products and services;
- We may use the information to customise the website according to your interests;
- We will use your personal data and contact details (including but not limited to your name, your child's name, your telephone number, your email address, your home address) to communicate with you about our services or your child's (the tutee's) progress;
- With your agreement, we may pass on your contact details to a third-party tutor or other relevant education professional should we not have the capacity to take your child on as a new tutee.

# Log files

Every time someone visits our website a log file is generated on our server. The log file records the time and date of your visit, the files that were requested, your IP (Internet Protocol) address, the referrer URL (if provided) and the browser version. We collect this information to help us diagnose problems and administer our systems and to audit the geographical make-up of users and how they have arrived at our site; that is, from what other sites have visitors arrived - this information

being obtained from the referrer URL.

We do not normally link IP addresses to anything personally identifiable, which means that you remain anonymous even though we include your IP address in our aggregate information. However, we can and will attempt to use IP addresses to identify a user when we feel it is necessary to enforce compliance with our terms and conditions or to protect our services and other users.

# The legal grounds under GDPR for processing your personal data

- It is necessary for the performance of a contract to which you are a party, or
  to take steps prior to entering into a contract with you, for us to provide you
  with our products and services. Where we require information from you for
  these purposes, we have set out above which information it is necessary for
  us to process, without which we will be unable to provide you with our
  services;
- It is necessary for the purposes of our legitimate interests, such as fraud prevention, child protection, maintaining quality of service, error detection and cybersecurity, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). To determine this, we shall consider several factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you;
- You have given us explicit opt-in consent to the processing of your personal data for one or more specific purposes, namely where you have given us consent to receive electronic Direct Marketing by us and/or by third parties;
- Where we need to comply with a legal obligation; or in rare circumstances:
  - Where we need to protect your interests (or someone else's interests);
     and/or
  - Where it is needed in the public interest or for official purposes.

#### Storing your personal data

In operating our website, it may become necessary to transfer data that we collect from you to locations outside of the U.K. and the European Union for processing and storing. By providing your personal data to us, you agree to this transfer, storing and processing. We do our utmost to ensure that all reasonable steps are taken to make sure that your data is stored securely.

Unfortunately, the sending of information via the internet is not entirely secure and on occasion, such information can be intercepted. We cannot guarantee the security of data that you choose to send us electronically, sending such information is entirely at your own risk.

#### **Disclosing your information**

We will not disclose your personal information to any other party other than in accordance with this Privacy Policy and in the circumstances detailed below:

- In the event that we sell any or all of our business to a buyer;
- Where we are legally required by law to disclose your personal information;
- To further fraud protection and reduce the risk of fraud.

#### Your rights

You have the right to request what personal information is held about you and our reasons for processing it. Below, please find examples of rights that all individuals have under the GDPR data protection laws. Please be advised that they do not apply in all circumstances.

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;

- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the "right to be forgotten");
- The right to request access to your personal information and to obtain information about how we process it;
- The right to make a complaint to the Information Commissioner's Office
  (ICO) at any time. However, we would appreciate the chance to deal with
  your concerns before you approach the ICO so please contact us in the first
  instance.

#### **Users under 18**

If you are under 18, please ensure that you obtain your parent/guardian's consent beforehand whenever you provide Personal Information to the website. Users without such consent are not allowed to provide us with Personal Information.

#### Links to other websites

Our website may contain links to enable you to visit other websites of interest easily. 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 statement. You should exercise caution and look at the privacy statement applicable to the website in question.

# **Cookies Policy**

#### Cookies

Visiting this website <a href="www.acetuitionharpenden.co.uk">www.acetuitionharpenden.co.uk</a> with your browser settings adjusted to accept cookies tells us that you want to use our services and that you consent to our use of cookies and other technologies to provide them to you as described in this notice. See below for information on how to modify the settings in your browser to notify you when you receive a new cookie and disable cookies altogether.

#### Cookies and how we use them

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 Wix Analytics and Google Analytics to monitor how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Follow this link for an overview of privacy at Google: <u>Privacy Policy – Privacy & Terms – Google</u> To opt out of being tracked by Google Analytics across all websites visit: <u>Google Analytics Opt-out Browser Add-on Download Page</u>

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To

find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <a href="www.allaboutcookies.org">www.allaboutcookies.org</a> or <a href="www.aboutcookies.org">www.aboutcookies.org</a> for further information on how to control cookies.

Most web browsers will allow you to block and delete selected / all cookies currently installed on your device. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer.

# **Third-Party cookies**

During your visits to this website you may be delivered cookies by third-party websites. When you visit a page with content embedded from, for example, Facebook, Twitter or YouTube, you may be presented with cookies from these websites. ACE Tuition does not control the dissemination of these cookies. You should check the third-party websites for more information about these.

# **Contacting us**

We value your opinions. If you have comments or questions about our privacy policy, please send them to ACE Tuition via: <a href="mailto:amy@acetuitionharpenden.co.uk">amy@acetuitionharpenden.co.uk</a>