

## **Privacy Policy for Minors (under 18)**

Date	Version	Created by	Description of change
3/07/2022	1	Head of Operations	Basic document outline
11/08/2022	1.1	Head of Operations	Added and changed
20/07/2023	2	Lead Administrator (AT)	Amended & updated.

## What are we talking about in this document?

This document talks about how Capital Tuition Group (Capital Tuition Group uses "we", "us" "CTG" and "our" to refer to itself here) uses your 'personal information' and explains what choices you have about how we use it. This page has been written for Capital Tuition Group's younger students, but if you find it hard to understand, you can ask a parent, guardian or a trusted adult to help explain it to you.

## **Key things to know:**

We look after your information and take steps to keep it secure and private. CTG uses some information about you to provide tuition services and make them the best they can be. And when it comes to your information, you have certain choices. For example, you can ask us to:

- Give you a copy of it
- Update it
- Or delete it, in some situations

You can make these choices and (others) by contacting us for a chat.

#### What Information Does CTG Collect About Me?

When we say personal information, we mean information that could be used to identify or contact you, like your name or email address. There are times when we will ask you for this kind of information, for example, when you or your parent/guardian/school signs up for a tuition service or when you get in touch with us to ask for help.

We might also ask for your permission to collect information before you start using our website. For more information, see our <u>Cookie Policy</u> which explains how we collect information on websites.

## **How Is CTG Using My Information?**

CTG uses the information we collect about you for the purposes explained below. You can always find out more in our <u>Privacy Notice</u>.

#### To provide our services:



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We need some information about you to provide our services to you, answer your questions and send you important messages related to your tuition.

#### When we have a legitimate interest:

We have a legitimate interest when we have an important reason to use your information, provided that its use is fair to you. For example, we have a legitimate interest when we use your information:

- To keep you up to date with any news or changes to your tuition.
- To detect and prevent fraud, security or technical issues and to protect against harm to the rights, property or safety of CTG, our clients or the public.
- To answer your questions and send you important messages about our services.
- To allow your tutor to keep in touch with you when necessary.

#### If you and/or your parent or guardian gives us permission to.

With your permission or the permission of your parent or guardian, we will send you messages telling you about other services we think you might like.

#### When the law requires it.

Sometimes, we have to use your information because the law tells us we have to, even if you haven't given us your permission. An example would be when the government or the police need to investigate something.

#### When we need to transfer your information.

CTG may need to send your information to locations outside your country as part of providing our services to you. The laws that protect your personal information can also vary from country to country. You or your parent, guardian or a trusted adult can find out more through our <u>Privacy Notice</u> or <u>contact us</u> to learn more about the steps we take to protect your information when we send it to different countries.

We keep your information for no longer than we need to — for the uses we covered above or to meet legal requirements.

We work hard to protect your personal information. We use a number of different methods to keep information confidential.

## Who Does CTG Share My Information With?

Sometimes we might share your information with others:

- CTG shares your information with companies we hire to help us. For example, these companies could help us with marketing, help us to keep our services secure and/or help us to take payments. We make sure the other company promises to protect your information like CTG would.
- Sometimes we have to share your information to protect you, CTG or someone else from harm.
- If we sell our business, we will share your information with the buyer so they can continue to provide your tuition services.



## **You Have Choices and Rights**

You have choices about how we use your information.

#### There are different ways you can make your choices about how we use your information:

- You can tell us to stop sending you emails about opportunities to book CTG services by clicking the unsubscribe link at the bottom of mailing list emails.
- You can always contact us and we will do our best to help you.

#### Under data privacy laws, when we use your information, you can:

- Ask us for a copy of the information we have about you.
- Change the information we have about you or update it if it is wrong.
- Ask us to delete your information.
- Ask us not to use information about you to sell you anything.
- Ask us to transfer your information.
- Tell us if you are worried about the way we are keeping or using information about you and want to make a complaint about this.
- Ask us to stop using information about you.
- Complain to the Data Protection Regulator in your country. The Data Protection Regulator is there to ensure companies like CTG protect your information and abide by the rules.

These rights sometimes only apply if certain conditions are met. If you want more information on these rights, you could ask your parent, guardian or a trusted adult (who can also learn more from our <a href="Privacy Policy">Privacy Policy</a>) or <a href="Contact us">Contact us</a>.

## Is There Anything I Shouldn't Do?

Any recording of a live lesson without very clear permission from Capital Tuition Group and all other individuals or companies involved in the tuition is strictly forbidden as in some cases it could be a criminal offence and lead to you being reported to the Information Commissioner's Office (ICO) or even the police.

If you have a genuine need to record a live lesson (for example due to significant learning needs or a specific requirement of a school) a written request would need to be made to Capital Tuition Group via email hello@capitaltuitiongroup.com. Capital Tuition Group does have the right to reject this request if it goes against GDPR rules. If Capital Tuition Group decided it was appropriate to grant your request, we will need to



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ask permission from everyone else involved in your lesson and it can only be granted once written confirmation is received from all of them.

Under no circumstances should lesson links be passed on to anyone else who is not registered for the lesson. This includes passing on the link via email, private messaging, social media and/or any other methods. Any unauthorised passing on of a lesson link to anyone other than the students/tutors/staff/parents who are supposed to have it, will lead to the person responsible being reported to the Information Commissioner's Office (ICO) and, possibly, the Police. If Capital Tuition Group has enough evidence to suggest that a lesson link has been passed on by any student, Capital Tuition Group has the right to ban and cancel this student from the tuition. In this instance, the client of the student in question will not be eligible for a refund of any prepaid tuition.

## **Find Out More About These Privacy Topics**

Do you want to learn more? We have lots of other information available. But some of it might be easier to understand if you read it with a parent, guardian or a trusted adult. You can read our <u>Privacy Policy</u> here.

This page explains how CTG uses your information. You can learn about how other companies use your information by reviewing their privacy statements.

You can also visit the ICO (Information Commissioner's Office) website to learn even more about privacy and data protection: <a href="https://ico.org.uk/">https://ico.org.uk/</a>

# This policy will be reviewed annually in line with current best practice and KCSIE/DFE/Legal guidance.

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Approval Date	Renewal date	Version No.	Approved by	Date			
21.7.21	1.9.22	01	Matthew Curnier (Director)	21.7.21			
1.09.22	1.9.23	02	Matthew Curnier (Director)	1.9.22			
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