**Golden Thistle Tutoring Privacy Policy**

Effective Date: 20/08/24

Golden Thistle Tutoring ("Company", "we", "our", or "us") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect personal information obtained from Clients, Students, Tutors, and visitors to our website. By using our services, you agree to the practices described in this policy.

**1. Definitions**

* Client: The parent or legal guardian of a Student, or the Student if aged 18 or older.
* Student: The individual receiving tutoring services.
* Tutor: The independent contractor engaged by Golden Thistle Tutoring to provide tutoring services.
* Personal Data: Information relating to an identified or identifiable individual.
* Processing: Any operation performed on Personal Data, such as collection, storage, use, disclosure, and deletion.

**2. Data Controller**

Golden Thistle Tutoring is the Data Controller responsible for processing Personal Data under this policy.

**3. Types of Personal Data We Collect**

We collect and process the following categories of Personal Data:

3.1 Clients and Students

* Contact details (e.g., name, address, email, phone number)
* Educational details (e.g., academic performance, learning needs, goals)
* Payment details (e.g., bank account information, billing address)
* Communication records (e.g., Microsoft Teams chat history, emails)
* Scheduling and attendance records

3.2 Tutors

* Contact details (e.g., name, address, email, phone number)
* Qualifications and certifications
* Proof of eligibility to work (e.g., passport, visa)
* Disclosure certificates (e.g., PVG)
* Payment details (e.g., bank account information)
* Communication records

3.3 Website Visitors

* Device and browser information
* IP address and geographical location
* Cookies and usage data (for analytics and website functionality)

**4. How We Collect Personal Data**

We collect Personal Data through:

* Direct interactions: When you communicate with us via phone, email, WhatsApp, or other platforms.
* Automated technologies: Data collected through cookies and similar technologies when you interact with our website.
* Third parties: Information from references, educational institutions, or background check providers.

**5. How We Use Your Personal Data**

We process Personal Data for the following purposes:

* Providing Tutoring Services: Matching Students with Tutors, delivering and monitoring sessions, managing schedules, and progress reports.
* Communication and Resource Sharing: Facilitating communication through Microsoft Teams and other platforms, sharing resources, lesson plans, and updates.
* Payments and Invoicing: Processing payments and managing financial transactions.
* Legal Compliance: Fulfilling UK laws, including safeguarding and data protection regulations.

**6. Legal Basis for Processing Personal Data**

We process Personal Data based on:

* Contractual Necessity: Performing obligations under Client and Tutor Agreements.
* Legal Compliance: Meeting legal and regulatory obligations.
* Legitimate Interests: Operating and improving our services without overriding privacy rights.
* Consent: For activities like marketing, where you have given explicit consent.

**7. Sharing and Disclosure of Personal Data**

We may share Personal Data with:

* Tutors and Clients: For delivering tutoring services.
* Service Providers: IT services, payment processing, administrative support (all bound by confidentiality obligations).
* Legal and Regulatory Authorities: For compliance and safeguarding.
* Business Transfers: In case of mergers, acquisitions, or restructuring.

We do not sell or lease your Personal Data to third parties.

**8. Data Security**

We implement technical and organizational measures to protect your Personal Data, including:

* Encryption: Securing data in transit.
* Access Controls: Restricting access to authorized personnel only.
* Secure Storage: Storing data securely within the UK.

**9. Data Retention**

We retain Personal Data only as long as necessary for the purposes outlined or as required by law. After this period, data will be securely deleted or anonymized.

**10. Your Data Protection Rights**

You have the right to:

* Access: Request copies of your Personal Data.
* Correction: Request correction of inaccurate or incomplete data.
* Erasure: Request deletion in certain circumstances.
* Restriction: Request restricted processing.
* Objection: Object to processing based on legitimate interests or direct marketing.
* Data Portability: Request transfer of your data to another provider.
* Withdraw Consent: Withdraw consent where used as the legal basis.

To exercise these rights, contact us at: info@goldenthistletutoring.com.

**11. Cookies and Online Tracking**

Our website uses cookies for functionality and analytics. You can manage cookie preferences through your browser settings.

**12. International Transfers**

We do not transfer your Personal Data outside the UK or EEA. If this changes, we will ensure appropriate protections are in place.

**13. Third-Party Links**

Our platforms may contain links to third-party websites. We are not responsible for their privacy practices. Review their policies before providing any Personal Data.

**14. Updates to This Privacy Policy**

We may update this policy from time to time. Changes will be posted on our website, and significant updates will be communicated via email.

**15. Contact Information**

For questions or concerns regarding this Privacy Policy or our data practices, contact us at:

Golden Thistle Tutoring  
Email: info@goldenthistletutoring.com

16. How to Complain

If you are unhappy with our data practices, you can complain to the Information Commissioner’s Office (ICO):

Information Commissioner’s Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Helpline: 0303 123 1113  
Website: [www.ico.org.uk/make-a-complaint](https://www.ico.org.uk/make-a-complaint)